

STATE OF IOWA  
DEPARTMENT OF COMMERCE  
BEFORE THE IOWA UTILITIES BOARD

IN RE:  RELIANCE TELEPHONE OF GRAND FORKS, INC.	DOCKET NO. TF-2019-0026
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**COMMENTS**

The Office of Consumer Advocate (OCA), Iowa Department of Justice, files the following comment in response to the proposed tariff revisions filed February 22, 2021, by Reliance Telephone of Grand Forks, Inc. (Reliance) on February 22, 2021.

1. The order dated February 5, 2021, observes that the order dated December 11, 2020, “required Reliance to include provisions in the tariff for notice to inmates and customers regarding how to request refunds and any limitations on requesting refunds” and further observed that the revised proposed tariff filed January 6, 2021 “still does not include the required information regarding refunds.” Reliance was directed “to file a revised tariff sheet with that information as a new tariff filing.” Order Approving Tariff and Requiring Revised Tariff Sheet, Feb. 5, 2021, at 4.

2. Reliance did not file a revised tariff sheet but instead refiled the entire proposed tariff, without identifying the changes. The filing still does not include the required information. The only reference to refunds is section 3.1.3.B, which provides: “Customer can call at any time to request a refund at (800)-896-3201. Additional refund instructions are available at [www.reliancetelephone.com/policies](http://www.reliancetelephone.com/policies).” The reason for requiring a provision in the tariff for notice to inmates and customers is to ensure that they are alerted to the fact that a balance remains so they can request a refund and avoid a forfeiture. Merely stating that instructions

appear on the company's website for how to request a refund does not provide the necessary information. The website, unlike the tariff, can also be changed unilaterally.

WHEREFORE, the foregoing issue merits further attention.

Respectfully submitted,

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OFFICE OF CONSUMER ADVOCATE