

STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD

IN RE:	
GLOBAL TEL*LINK CORPORATION	DOCKET NO. TF-2019-0039
INQUIRY INTO REGULATORY REQUIREMENTS FOR ALTERNATIVE OPERATOR SERVICES COMPANIES	DOCKET NO. NOI-2019-0001

REPLY

The Office of Consumer Advocate (OCA), a division of the Iowa Department of Justice, replies as follows to the response filed June 29, 2021, by Global Tel*Link Corporation (GTL).

1. In its June 29, 2021 Response to OCA's June 9, 2021 Complaint and Request for Further Proceedings, GTL quotes from the Board's order issued August 20, 2020, as support, but omits the following:

The rates are either within, or below, the range of interstate per-minute rates established by the FCC for interstate inmate calling service. If the FCC decides to reduce the interstate rates for inmate calling service, the Board may revisit whether the rates approved are just and reasonable.

Order Requiring Filing of Tariff Revisions and Annual Registration, Aug. 20, 2020, at 10.

2. The FCC now has decided to reduce the rates for interstate inmate calling service. There is no longer a range of interstate per-minute rates established by the FCC. There is now a uniform interstate cap of \$.21 per minute.

3. The issue of intrastate rates is relevant not only to GTL but also to other inmate calling service providers, which have tariffed rates exceeding the interstate cap by more than one cent per minute.

WHEREFORE, OCA requests the initiation of further proceedings in each of the dockets included in OCA's complaint—except Docket Nos. TF-2019-0270 and TF-2021-0071¹ in which the providers have revised their tariffs to conform with the \$.21 per minute cap—to determine whether the tariff provisions authorizing per minute charges in excess of \$.21 per minute are just and reasonable and, if not, to require revised tariff provisions with per minute charges no higher than the FCC interstate rate of \$.21 per minute.

Respectfully submitted,

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OFFICE OF CONSUMER ADVOCATE

¹ Formerly TF-2019-0030.