

**STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD**

IN RE:

ENCARTELE, INC.

DOCKET NO. TF-2019-0270

**PRISON POLICY INITIATIVE'S COMMENTS
REGARDING ENCARTELE'S PROPOSED TARIFF (REVISED)**

Pursuant to the Board's order of September 25, 2020, Encartele, Inc. filed a revised proposed tariff in the above-captioned proceeding on October 9, 2020 (the "Revised Tariff"). The Prison Policy Initiative, Inc. ("PPI"), having previously been granted leave to intervene in this proceeding, submits the following comments regarding the Revised Tariff.

The Revised Tariff proposes a rate of 25¢ per minute for prepaid calls. Revised Tariff § 4.3.1. PPI objects to this rate because it is above the 21¢ rate cap currently imposed by the Federal Communications Commission for prepaid interstate calls. 47 C.F.R. § 64.6030. The FCC is considering its own proposal to reduce this cap to 14¢ per minute. *See* Letter from Chairman Ajit Pai (Jul. 20, 2020, docketed in this proceeding on Aug. 3, 2020).

The rates in the Revised Tariff exceed the relevant FCC cap, yet Encartele has provided no material evidence justifying such charges. For this reason, PPI respectfully requests that the Board not approve the Revised Tariff as currently written.

Dated: October 20, 2020

Respectfully submitted,

PRISON POLICY INITIATIVE, INC.

/s/ Peter Wagner

By Peter Wagner, Executive Director
MA Bar No. 662207, *admitted pro hac vice*
69 Garfield Ave., 1st Floor
Easthampton, MA 01027
(413) 527-0845
pwagner@prisonpolicy.org