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March 31, 2005

RECEIVED
CONSUMER SERVICES DIVISION
APR 04 2005
TN REGULATORY AUTHORITY

VIA FEDERAL EXPRESS OVERNIGHT

Mr. Eddie Roberson
Chief, Consumer Services Division
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re Inmate Phone Provider Service Standards

Dear Mr Roberson

This letter is in response to your request that Pay Tel Communications, Inc provide copies of state service standards for telephone calls originating from correctional facilities

I am attaching service rules compiled by Global Tel*Link from the rules of Public Utility Commissions in states surrounding Tennessee These standards are representative of the standards in other states in which inmate phone service providers furnish services

If you should have any questions or require any further information regarding these standards, please do not hesitate to contact me at 1-800-729-8355 ext 227 or via e-mail at vtownsend@paytel.com Thank you for your time and assistance with this issue.

Sincerely,

Vincent Townsend
President

VT/bp

Attachment

cc Ms Lynda Gaston



March 30, 2005

VIA HAND DELIVERY

Mr Eddie Roberson
Chief, Consumer Services Division
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re Inmate Provider Service Standards

Dear Mr. Roberson

This letter is in response to your request that Global Tel*Link provide copies of state service standards for telephone calls originating from correctional facilities. Attached are service rules gleaned from the rules of Public Utility Commissions in states surrounding Tennessee.

I have also sent soft copies of these service standards to Ms. Colleen Dziuban and Mr. Vince Townsend and I have received responses from both Colleen and Vince that they are in agreement that these standards are representative of the standards in other states in which inmate providers furnish services. It is my understanding that you will receive a letter from both companies confirming their agreement.

If you should have any questions or require any further information regarding these standards, please do not hesitate to contact me at 1-800-489-4500 ext. 2215 or via e-mail at lgaston@gtl.net. Thank you for your consideration.

Sincerely,

Lynda Gaston
Regulatory & Legal Analyst

cc. Ms. Colleen Dziuban
Mr. Vince Townsend

Florida Public Service Commission Rules:

Response to Commission Staff Inquiries.

The necessary replies to inquiries propounded by the Commission's staff concerning service or other complaints received by the Commission shall be furnished in writing within fifteen (15) days from the date of the Commission inquiry.

Customer Complaints and Service Requests.

(1) Each telephone utility shall make a full and prompt investigation of all complaints and service requests made by its customers, either directly to it or through the Commission and respond to the initiating party within fifteen (15) days. The term "complaint" as used in this rule shall be construed to mean any oral or written report from a subscriber or user of telephone service relating to a physical defect, difficulty or dissatisfaction with the operation of telephone facilities, errors in billing or the quality of service rendered.

Line Information Database Maintenance.

(1) Within 6 months of the effective date of this rule, each local exchange telecommunications company shall:

(a) Update the Line Information Database (LIDB) with the account ownership code of the Competitive Local Exchange Company claiming the customer, provided the CLEC has contracted with the local exchange company to provide such information or has purchased the line directly from the local exchange company; and

(b) Provide CLECs access to LIDB, or provide updates on a contractual basis, at reasonable cost-based terms and conditions, for each CLEC that enters into a contract.

(2) LECs are exempt from subsection (1) of this rule if there is no CLEC within the service area that allows third-party or collect calls. If a CLEC in the service area elects to allow third-party or collect calls, the LEC shall comply with this rule within 6 months after such time.

General Rules for Pay Telephone and Operator Service Providers

(1) Each pay telephone service company shall make all reasonable efforts to minimize the extent and duration of interruptions of service. Service repair programs should have as their objective the restoration of service on the same day that the interruption is reported to the company. (Sundays and holidays excepted)

(2) A pay telephone provider shall not obtain services from an interexchange carrier or an operator service provider unless such carrier or provider has obtained a certificate of public convenience and necessity from the Commission.

(3) Every company providing operator services shall clearly state the name of the company upon answer and again after accepting billing information before the call is connected.

(4) An operator services provider shall have current rate information readily available and provide this information orally to end users upon request prior to connection.

- (5) Each operator services provider shall provide an opportunity for each caller to be identified by name to the called party before any collect calls may be completed
- (6) An operator services provider shall require that its certificated name appear on any telecommunications company's bill for regulated charges.
- (7) An operator services provider shall require all calls to be individually identified on each bill from a telecommunications company on an end user's bill, including the date and start time of the call, call duration, origin and destination (by city or exchange name and telephone number), and type of call.
- (8) An operator services provider shall provide a toll-free number for customer inquiries on the bill and maintain procedures adequate to allow the company to promptly receive and respond to such inquiries.
- (9) An operator services provider shall charge only for conversation time as rounded according to company tariffs
- (10) An operator services provider shall have current rate information readily available and provide this information orally to end users upon request prior to connection.

Georgia Institutional Telecommunication Services Rules:

Each service provider's operator, live and/or mechanical, shall clearly state the name of the company at the initiation of any encounter with a customer so that the customer is fully informed as to which carrier will be handling his or her call before the customer incurs any charge. Each service provider's operator shall also clearly state the company name at the conclusion of its contact with the customer

- (1) Each service provider's operator shall fully disclose the rate to be charged for the call including surcharges, if requested by the customer before the customer incurs any charge.
- (2) The instrument (telephone) must
 - (a) Provide outward-only calling (be it at the location itself or through the central office serving that location).
 - (b) Where call termination is deemed appropriate by the administration of the institution, limit call duration to a 15 minute interval, unless another time interval is specifically requested by the administration of the institution.
 - (c) Be installed in compliance with all accepted telecommunications industry standards and the current National Electric Code and the National Electric Safety Code.

- (3) The service provider must block or arrange to have blocked calls to local Directory Assistance (411), long distance Directory Assistance (555-1212), toll free numbers (1-800), 700, 900, 911, 950, 976, 10xxx and any other numbers the Institution and/or the Commission find may jeopardize the integrity and security of the institution and the safety of the public
- (4) The service provider, must provide 0+ collect or prepaid only calls for local, intraLATA toll, and interLATA toll calls and must block access to all other types or forms of calls.
- (5) The service provider, must insure that a positive response from the called party indicating a willingness to pay for the call is received before completing the call. A positive response is defined as a pulse/tone generated response and/or verbal acceptance. No other method may be used in confirming a call (ie. time outs that automatically complete the call if nothing is done or wrong number[s] are entered or the inability of called party instrument [telephone] and so on).
- (6) Institutional Service Providers must adhere to the same rules and regulations that govern billing authority as approved by this Commission for Resellers, IXC's and AOS companies, meaning that the Institutional Service Provider must be identified on the bill submitted to the customer (called party) by the LEC. In the event it is impractical or impossible for the applicable LEC to comply with this Rule, the Institutional Service Provider may apply to the Commission for a waiver of this Rule, which shall be reviewed on a case by case basis.
- (7) The service provider, within the confines of an institution, must order a separate public telephone access line for institutional services which may serve up to three instruments per line installed. If more than one instrument occupies the line, then only one instrument may use the line at any given time.

Kentucky Public Service Commission Telephone Rules

Section 4 Basic Utility Obligations.

- (1) Each telephone utility shall provide telephone service to the public in its service area in accordance with its rules and tariffs on file with the commission. Such service shall meet or exceed standards set forth in this administrative regulation.
- (2) Each telephone utility shall continually review its operations to assure adequate service.

- (3) Each telephone utility shall maintain records of its operations in sufficient detail necessary to permit review, and those records shall be available for inspection by the commission upon request.

Customer Billing Bills to customers shall be rendered regularly and shall contain clear listings of all charges. The utility shall comply with reasonable customer requests for an itemized statement of charges. All toll charges shall be itemized separately.

Alabama Public Service Commission Rules

(C) Coinless Inmate Telephone Collect-Only Service

- (1) This type of service is placed in areas where prisons/jails have internal rules and regulations administered in compliance with the State Department of Corrections, or city or county governmental body, which governs inmate telephone usage and access.
- (2) This service is initiated by the calling party selecting the option of making a station-to-station or person-to-person call.
- (3) All operator services provided at coinless pay telephones located in prisons must be provided under a certificate issued by the Commission and in compliance with Commission rules.
- (4) Traffic and transmission studies shall be made, and records maintained, to the extent and frequency necessary to determine that sufficient plant and an adequate operating force are provided at all times, including the busy hour/busy season.

Arkansas Public Service Commission OSP Rules

An OSP shall allow consumers to terminate calls without incurring a charge before a connection is completed.

An OSP shall disclose upon request and at no cost to the consumer, information regarding its rates and charges.

Any rates quoted by an OSP must be exact rather than approximate, based on the pricing of the specific call.

Mississippi Public Service Commission

- A. INFORMATION TO CUSTOMERS Each utility shall upon request give its customers such information and assistance as may be reasonable in order that customers may obtain efficient and reasonably adequate service.

North Carolina Public Utilities Commission

Notwithstanding any other rules in this Chapter, PSP instruments located in the detention areas of confinement facilities:

- (a) May, if specifically requested by the administration of the confinement facility, be arranged or programmed to allow outward-only calling;
- (b) May, if specifically requested by the administration of the confinement facility and if the access line provider and presubscribed interexchange carrier are notified by the PSP, be arranged or programmed to terminate calls after 10 minutes of conversation time;
- (c) Shall be arranged or programmed to allow only 0+ collect calls for local, intraLATA toll, and interLATA toll calls and to block all other calls including, but not limited to, local direct calls, credit card calls, third number calls, 1+ sent-paid calls, 0+ sent-paid calls, 0- sent-paid calls, 0- calls, toll free 8XX calls, 900 calls, 976 calls, 950 calls, 911 calls, 10xxx, and 101xxxx calls. Provided, however, that if specifically requested by the administration of the confinement facility, 1+ toll and seven-digit local dialing may be permitted if the access line provider or the PSP instrument can block additional digit dialing after initial call set-up.
- (d) May, if specifically requested by the administration of the confinement facility, be arranged to block access to certain specific numbers identified by the administration or to allow access to only certain specific numbers identified by the administration.
- (e) Shall, at the request of the administration of the confinement facility, provide for the cutoff of designated PSP instruments through the use of cutoff keys or switches placed on the PSP's side of the network interface;
- (f) May, with the express written consent of the administration of the confinement facility, terminate PSP trunks provided by the access line provider for use at the facility in manual or automatic line concentrators; the concentrator may not be arranged or programmed to allow access by more than one PSP instrument to a single PSP trunk at any time; prior to connection of the equipment, the PSP is obligated to advise the access line provider of its intent to connect a concentrator to the access line provider's facilities, specifically identify the

trunks which will terminate in the concentrator and, upon demand, provide the FCC registration number of the equipment.

- (g) May, with the express written consent of the administration of the confinement facility, be arranged to provide three-way call detection and call detail from the payphones located within the confinement facility subject to the following conditions:
 - (1) Three-way call detection may be arranged at the request of the facility administrator such that the call may be disconnected or noted for further investigation. When three-way call detection is arranged for disconnection, a recorded announcement shall inform the called party, before acceptance of the call, that the call may be disconnected if an attempt to use three-way calling is detected. The PSP shall give credit for wrongful disconnections according to its established credit procedures.
 - (2) Call detail information such as date and time of calls, duration of calls, and called and calling telephone numbers may be provided to the confinement facility administrator at his request.