

RESPONSE TO DOCUMENT REQUEST NO. 2

COMPLAINT RESPONSES



SECURUS
TECHNOLOGIES

January 26, 2011

Office of the Attorney General
Attn: Mali Lim
Public Inquiry and Assistance Center
1 Ashburton Place
Boston, Massachusetts 02108

VIA FAX: (508) 991-6262

RE: David [REDACTED]
Intake #: [REDACTED]

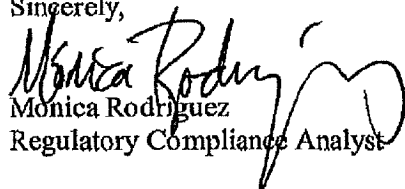
Dear Ms. Lim:

Securus Technologies, Inc., formerly known as Evercom Systems, Inc., with its customer service department, Correctional Billing Services, (collectively, "Securus") hereby responds to Mr. David [REDACTED] complaint.

In Mr. [REDACTED] complaint, he states that he remitted payment to an account; however, he has not received calls. He states when he calls Securus' customer service center, he is advised there is not an account associated with his telephone. He further mentions when he navigates Securus' Interactive Voice Response automated line, it states he has money on an account. Please note internal records reflect there is no account associated with 774-[REDACTED]. Our investigation has revealed, however, through a name search, accounts for David [REDACTED] and his address associated with telephone numbers 508-[REDACTED], 508-[REDACTED] and 508-[REDACTED]. For the account associated with telephone number 508-[REDACTED], a refund in the amount of \$30.00 was issued to Mr. [REDACTED] on 03/20/2010. The account associated with 508-[REDACTED] shows a payment remitted on 02/26/10 for \$75.00; however, the funds were utilized. No remitted funds are shown for telephone number 508-[REDACTED]. At this time, we do not have record of a payment associated with telephone number 774-[REDACTED] nor can we locate an account associated with that telephone number. We respectfully request that Mr. [REDACTED] forward redacted copies of the payment transaction to CBS to which he is referring, for further investigation.

If there are any further questions regarding this complaint, please contact me Linda Nelson (972) 277-0300.

Sincerely,


Monica Rodriguez
Regulatory Compliance Analyst



June 9, 2011

Massachusetts Attorney General
Attn: Ms. Janice Fahey, Mediator - Elder Division
One Ashburton Place
Boston, MA 02108

RE: Mr. Leonard [REDACTED] (401) [REDACTED]
File No. [REDACTED]

Dear Ms. Fahey:

Securus Technologies, Inc., with its customer service department, Correctional Billing Services, (collectively, "Securus"), hereby responds to Mr. Leonard [REDACTED] complaint regarding rates and fees involving collect calls accepted from the Hampden County Correctional Center located in Ludlow, Massachusetts. Securus is an inmate telephone service provider that handles inmate collect calls from this confinement facility.

According to [REDACTED] complaint, he indicates he was charged excessive rates and fees even though he was provided with a quote of \$2.50 per call. At this time, he would like this matter investigated as he feels he should not be charged more than \$2.50, which he states he was quoted prior to accepting calls.

Investigation into this matter finds traditional collect account number [REDACTED] was established in the name of Leonard [REDACTED] on March 16, 2011 for billed telephone number (401) [REDACTED]. According to our records, ten (10) collect calls originating from the Hampden County Correctional Center in Ludlow, Massachusetts were accepted at (401) [REDACTED] between March 16, 2011 and March 20, 2011. Customer records confirm positive acceptance was made at (401) [REDACTED] and the collect calls were accepted by someone at Mr. [REDACTED] residence.

To provide some background about our business, inmate collect calls are generally billed through a consumer's LEC, as a convenience to the consumer. Once an inmate attempts to place a collect call to a consumer, the call is processed once the system has established that the consumer's LEC has a billing and collection agreement with Securus. Once Securus has a means to bill the call, a consumer is contacted by an automated call processor stating that an inmate is attempting to place a collect call to the consumer. In the automated message, the consumer is provided with the name of the inmate placing the call, as well as the confinement facility where the inmate is located. Consumers are then offered several options requiring their confirmation by pressing a corresponding key on their telephone keypad. The options offered to consumers include: a prompt to press a key to hear the rates applicable to the call, a prompt to press a key to prevent all future calls from the facility in question, a prompt to press a key to accept the call and a prompt to press a key to refuse the call. This system ensures customers are given the opportunity to access cost associated information prior to accepting a call and incurring charges. Equally important, this system of positive acceptance ensures that a consumer will not be inadvertently billed for calls they do not wish to receive.

When a consumer initially accepts a collect call from the facility serviced by Securus, an account is established so that future inmate calls may then be processed and billed. The associated collect call charges will appear on the consumer's LEC bill indicating which charges are billed on behalf of Securus with details of the date, time, location, and minutes for each of the relevant calls. When a customer is billed by their LEC for collect call charges, they do not receive any direct correspondence from Securus regarding their charges.

Rates are determined by the calling areas of regions. Mileage is not the primary determining factor for rates and in many situations, a long distance call can be a call to across the street or to a neighbor next door. For rating purposes, calls are considered either intrastate or interstate. Intrastate calls occur within the boundaries of one state and are rated as local, intraLATA or interLATA calls. Calling areas are largely based on LATA (Local Access Transport Area) lines that were determined during the 1984 divestiture of AT&T. These lines determine if a call is within a LATA (IntraLATA) or outside of a LATA (InterLATA). Calling areas are structured by Area Code and exchange numbers, in other words the first 6 digits of the phone number.



Consumers should note that prior to the acceptance of any call that Securus processes, the consumer has the option to get a rate quote before accepting the call. Securus advises all consumers to select the option to hear the rates before accepting any call in the event that a rate change may have occurred. If a consumer feels the rate is too high, he/she may decline the call because there is no obligation to accept and no charges will be incurred. If the consumer responds to the prompt to accept the call before the prompt to listen to the rates and the cost of the call, then he/she will bypass the rate option. The consumer should listen to all of the prompts provided before making a selection. Once a consumer makes a positive acceptance of the call, the consumer is responsible for the charges incurred during the call.

For Mr. [REDACTED] records, the calls from the Hampden County Correctional Center in Ludlow, Massachusetts to West Warwick, Rhode Island (Mr. [REDACTED] residence) are classified as "InterLATA/interstate" calls and the rates are as follows:

Hampden County Correctional Center in Ludlow, Massachusetts	
Operator Service Charge:	\$3.95 (per call)
Usage Charge:	\$0.89 (per minute)

For a 15 minute call the charge would be \$17.30 plus applicable taxes and regulatory fees. An analysis of Mr. [REDACTED] call records indicates that he has been billed correctly according to the above-noted rates.

Mr. [REDACTED] has also stated that he was which he states he was not made aware of. Securus informs customers that additional taxes may apply in each rate quote. As explained herein, consumers are provided with the option to hear a rate quote for every call received by Securus. When the called party presses the option for a rate quote they will hear: "This call will cost [[X] dollars and [X] cents for the first minute and] [X] [dollars] [cents] for each [additional] minute, plus any applicable telecom and sales taxes." For Mr. [REDACTED] convenience, a copy of our fee descriptions has been attached for his convenience.

In conclusion, Securus' investigation finds that Mr. [REDACTED] has been accurately billed by his LEC provider as a result of the positive acceptance of ten (10) collect calls between March 16, 2011 and March 20, 2011 for billed telephone number (401) [REDACTED] positive acceptance has been verified, at this time the disputed charges have been sustained for Mr. Kerchner's account.

If there should be any further questions regarding this issue, please contact me at (972) 277-0300.

Sincerely,

Eric Ramey
Regulatory Compliance Analyst

Enclosures: (1)

cc: Mr. Leonard [REDACTED] West Warwick, RI 02893



April 8, 2011

Federal Communications Commission
Attn: Jeffrey H. Tignor
445 12th Street, SW
Washington, DC 20554

VIA EMAIL: carrierresponses@fcc.gov

RE: Douglas [REDACTED]

Complaint No. [REDACTED]

Dear Mr. Tignor:

Securus Technologies, Inc., with its customer service department, Correctional Billing Services, (collectively, "Securus"), hereby responds to Mr. Douglas [REDACTED] complaint regarding the rates for collect calls accepted from the Franklin County Corrections Facility located in Greenfield, Massachusetts. Securus is an inmate telephone service provider that handles inmate collect calls from this confinement facility.

Securus periodically receives inquiries from consumers asking why rates are higher than local and long distance calls not made from a correctional facility. The cost of calls from inmate telephone systems is higher because there are additional processes that must take place in order to process and complete calls from an inmate. In order to support operation of the confinement facilities, Securus works with the confinement facility's management to customize the system applications to provide call control, inmate telephone activity tracking, and investigation and administrative tools. Because there are additional costs incurred to develop and maintain these systems, the rates charged by Securus to process inmate calls are higher than those calls made from a residential or business line. In order to protect the public, preserve security and prevent fraudulent activities, inmate access to 800 numbers, directory assistance, live operators, 700 and 976 services is prohibited. In addition, correctional institution administrators often limit the number of calls and/or duration of calls made by inmates of the facility. As a provider of inmate calling services, Securus' rates are subject to the oversight of the Federal Communications Commission as well as most state Public Service Commissions.

Rates are determined by the calling areas of regions. Mileage is not the primary determining factor for rates and in many situations, a long distance call can be a call to across the street or to a neighbor next door. For rating purposes, calls are considered either intrastate or interstate. Intrastate calls occur within the boundaries of one state and are rated as local, intraLATA or interLATA calls. Calling areas are largely based on LATA (Local Access Transport Area) lines that were determined during the 1984 divestiture of AT&T. These lines determine if a call is within a LATA (IntraLATA) or outside of a LATA (InterLATA). Calling areas are structured by Area Code and exchange numbers, in other words the first 6 digits of the phone number.

Local calls are those to telephone exchanges where a long distance charge (also called "toll") is not incurred. A call within the boundaries of one LATA not rated as local is considered an intraLATA call, whereas a call between two LATAs is an interLATA call. Interstate calls are those made to another state and usually considered long distance calls as well.

As rates are based on the above described structure, the rates may differ for each location where Mr. [REDACTED] is attempting to call. Unfortunately, Mr. [REDACTED] did not specify where he is attempting to place a call so we are unable to provide the specific rates for a call. As such, the following information is provided as an example of a possible

[REDACTED]



SECURUS™
TECHNOLOGIES

call to Washington D.C. Calls placed from the Franklin County Corrections Institution in Greenfield, Massachusetts to Washington D.C., are classified as "Interstate" calls and the rates are as follows:

Franklin County Corrections Facility
Greenfield, Massachusetts

Operator Service Charge: \$3.95 (per call)
Usage Charge: \$0.89 (per minute)

For a fifteen (15) minute call, the charge would be \$17.30, plus applicable taxes and fees.

Mr. [REDACTED] should note that prior to the acceptance of any call that Securus processes, the consumer has several options that they may choose to listen to before they accept the call from the inmate. When the consumer picks up the call placed by an inmate, the consumer has the option to get a rate quote before accepting the call. We advise all customers to select the option to hear the rates, before accepting any call in the event that a rate change may have occurred. If a consumer feels the rate is too high they may decline the call because there is no obligation to accept and no charges will be incurred. If a consumer responded to the prompt to accept the call before the prompt to listen to the rates and the cost of the call, then he or she would have bypassed the rate option. The consumer should listen to all of the prompts provided before making a selection. Once a customer makes a positive acceptance of the call, it is the customer's responsibility for payment of the charges incurred during the call.

The complaint filed by Mr. [REDACTED] also states that he has experienced difficulty in contacting Securus, as he does not have the ability to contact our offices through our customer services representatives or online. In an effort to address this concern, Securus contacted the Franklin Corrections Facility for clarification on how an inmate may obtain information regarding the telephone service available at their facility. Securus confirmed with the facility Superintendent that inmates housed at the Franklin County Corrections Facility should contact their case worker directly for any rate requests, service issues or general concerns.

If there are any further questions regarding this complaint, please contact me at 972-277-0300.

Sincerely,

Eric Ramey
Regulatory Compliance Analyst

Co: Douglas [REDACTED]
[REDACTED]
Greenfield, MA 01301

[REDACTED]
[REDACTED]
[REDACTED]



June 6, 2012

Massachusetts Office of the Attorney General
c/o Middlesex Community College Law Center
Consumer Protection Program
33 Kearney Square
Lowell, Massachusetts 01852-1987

VIA Facsimile: (978) 441-1749

RE: Mr. Mark [REDACTED] (978) [REDACTED]
Complaint No. [REDACTED]

Dear Sir(s):

Securus Technologies, Inc., with its customer service department, Correctional Billing Services, (collectively, "Securus"), hereby responds to Mr. Mark [REDACTED] complaint regarding unauthorized charges involving collect calls accepted from the Worcester County Jail located in West Boylston, Massachusetts. Securus is an inmate telephone service provider that handles inmate collect calls from this confinement facility.

According to Mr. [REDACTED] complaint, he has been charged for inmate-initiated collect calls; however, he has denied all knowledge of accepting calls from a correctional facility. At this time Mr. [REDACTED] would like this matter investigated, as he states that he did not accept any collect calls from a correctional facility. Mr. [REDACTED] additionally states that he believes his identity has been compromised to fraudulently establish an account with Securus.

Securus's records indicate a total of twenty-one (21) inmate-initiated collect calls originating from the Worcester County Jail in West Boylston, Massachusetts were positively accepted through direct billed account number [REDACTED] between February 10, 2012 and February 14, 2012. Securus's records confirm positive acceptance was made and the calls were accepted by an individual with access to the billed telephone number associated with direct billed account number [REDACTED]

To provide some background about our business, inmate collect calls are generally billed through a consumer's Local Exchange Carrier ("LEC"), as a convenience to the consumer, or as prepaid calls through payments made directly to Securus. Once an inmate attempts to place a collect call to a consumer, the call is processed once the system has established a means to bill the call. The consumer is contacted by an automated call processor stating that an inmate is attempting to place a collect call to the consumer. In the automated message, the consumer is provided with the name of the inmate placing the call, as well as the confinement facility where the inmate is located. Consumers are then offered several options requiring their confirmation by pressing a corresponding key on their telephone keypad. The options offered to consumers include: a prompt to press a key to hear the rates applicable to the call, a prompt to press a key to prevent all future calls from the facility in question, a prompt to press a key to accept the call and a prompt to press a key to refuse the call. This system ensures customers are given the opportunity to access information concerning the cost of the call prior to acceptance. Equally important, this system of positive acceptance ensures that a consumer will not be inadvertently billed for calls they do not wish to receive. Those consumers that prefer not to be billed through their LEC, or whose LEC does not have a billing and collection agreement with Securus, must contact Securus directly to establish an account and make appropriate payment arrangements.

Investigation into this matter finds direct billed account number [REDACTED] was established in the name of Mark [REDACTED] on February 10, 2012 for billed telephone number (978) [REDACTED]. Due to nonpayment of the account balance prior to the due date in the amount of \$103.92, the direct billed account was blocked and systematically converted to a prepaid account. As such, Securus established prepaid account number [REDACTED] in the name of Mark [REDACTED] on April 19, 2012 for billed telephone number (978) [REDACTED]



Should a consumer suspect his/her identity or financial information has been used fraudulently to establish an account with Securus, the consumer is required to submit a Fraud Investigation Form in order to initiate an investigation. As such, Mr. [REDACTED] should be advised that in order to conduct a thorough investigation into the disputed charges, he must submit a completed Fraud Investigation Form to Securus. Securus requires the Fraud Investigation Form, as it authorizes our company to conduct a complete investigation in order to make a determination regarding disputed charges and related call detail. Additionally, Securus recommends Mr. [REDACTED] report all fraudulent activity to his local police department. For Mr. [REDACTED] future reference, a copy of the Fraud Investigation Form is accessible at Securus's website www.securustech.net under the "Consumer Solutions Center" drop down found under "Friends and Family" heading; or, by contacting our customer service center at (800) 844-6591. When submitting the completed Fraud Investigation Form, Securus highly recommends that Mr. [REDACTED] also submit a copy of a police report as well. For Mr. [REDACTED] convenience, a copy of the Fraud Investigation Form has been attached.

At such time as Mr. [REDACTED] submits a completed Fraud Investigation Form to Securus, a thorough investigation will be conducted for Mr. [REDACTED] disputed account. Upon completion of the investigation, Securus will update Mr. [REDACTED] account with actions taken to address his dispute. Securus advises Mr. [REDACTED] that the investigation into this matter could take up to thirty (30) days to complete upon receipt of completed Fraud Investigation Form.

Should Mr. [REDACTED] require any further assistance, he may contact Securus with any account related questions twenty-four (24) hours a day, seven (7) days a week through any of the following methods:

Securus Customer Contact Options	
Telephone	(800) 844-6591
E-mail	customerservice@securustech.net
Website	www.securustech.net
Interactive Web Chat	http://weblink.securustech.net/WebChatASP/Default.aspx
US Mail	Securus Correctional Billing Services P.O. Box 1109 Addison, Texas 75001

If there should be any further questions regarding this issue, please contact me at (972) 277-0300.

Sincerely,

Eric Ramley
Regulatory Compliance Analyst

Enclosures: (1)

cc: Mr. Mark [REDACTED]
[REDACTED]
Leominster, Massachusetts 01453



August 27, 2012

Federal Communications Commission
Consumer & Governmental Affairs Bureau
Attn: Sharon Bowers, Division Chief
Consumer Inquiries & Complaints Division
445 12th Street, SW
Washington, D.C. 20554

VIA FCC Web Interface

RE: Ms. Joann [REDACTED] - (413) [REDACTED]
Complaint No.: [REDACTED]

Dear Ms. Bowers:

Securus Technologies, Inc., with its customer service department, Correctional Billing Services, (collectively, "Securus"), hereby responds to Ms. Joann [REDACTED] complaint regarding inmate-initiated collect calls accepted from the Berkshire County House Of Corrections located in Pittsfield, Massachusetts. Securus is an inmate telephone service provider that handles inmate collect calls from this confinement facility.

According to Ms. [REDACTED] complaint, she desires the ability to have inmate-initiated collect calls billed through her Local Exchange Carrier ("LEC"). Ms. [REDACTED] further indicates that she believes Securus has required that she establish a prepaid account, in order to charge her additional fees. Additionally, Ms. [REDACTED] additionally states that she has experienced difficulty in reaching a Securus customer service representative. At this time, she would like this matter investigated.

To provide some background about our business, inmate-initiated collect calls are generally billed through a consumer's Local Exchange Carrier ("LEC"), as a convenience to the consumer, or as prepaid calls through payments made directly to Securus. When an inmate attempts to place a collect call to a consumer, the call is processed once the system has established that the consumer's LEC has a billing and collection agreement with Securus. Once a collect call is received from an inmate and Securus has a means to bill the call, a consumer is contacted by Securus through an automated operator system ("AOS") stating that an inmate is attempting to place a collect call to the consumer. The AOS provides, the consumer with the name of the inmate placing the call, as well as the confinement facility where the inmate is located. Consumers are then offered several options requiring their confirmation by pressing a corresponding key on their telephone keypad. The options offered to consumers include: a prompt to press a key to hear the rates applicable to the call, a prompt to press a key to prevent all future calls from the facility in question, a prompt to press a key to accept the call and a prompt to press a key to refuse the call. This system ensures consumers are given the opportunity to access information concerning the cost of the call prior to acceptance.

Ms. [REDACTED] should be advised that Securus's records indicate the billed telephone number (413) [REDACTED] is currently billed to a party other than of Ms. [REDACTED]. Due to the Customer Proprietary Network Information ("CPNI") rules enforced by the Federal Communications Commission ("FCC"), Securus is restricted from releasing any account information to Ms. [REDACTED] as she is not the customer of record for the account/billed telephone number in question.

It should be noted that Ms. [REDACTED] contacted Securus on March 30, 2012, April 13, 2012 and May 29, 2012 regarding this issue. On each occasion, Ms. [REDACTED] was informed that Proof of Ownership for billed telephone number (413) [REDACTED] is required before Securus is able to address any concerns regarding the LEC billed account for billed telephone number (413) [REDACTED].

As Ms. [REDACTED] has been previously informed, in order to assist Ms. [REDACTED] or the customer of record with the LEC billed account for billed telephone number (413) [REDACTED], Securus requires Proof of Ownership for the billed telephone number. In order to verify the current customer of record, Securus requests Proof of Ownership from Ms. [REDACTED]'s telephone service provider (e.g. AT&T) indicating the date her service was established. Proof of Ownership may include a copy of her installation order or a letter from his telephone service provider on the company's letterhead; however, any documentation must include: the name, address, telephone number associated with the account, as well as Ms. [REDACTED]'s first date of service. This information may be submitted by facsimile to Securus at (972) 277-0416, or mailed to: Securus Technologies, Inc., Attn: Regulatory Affairs, 14651 Dallas Parkway, Suite 600,



Dallas, Texas 75254. Upon receipt and verification of the requested documentation, Securus will update the account information listed for the LEC billed account established for billed telephone number (413) [REDACTED] in Securus's systems accordingly.

Investigation into this matter finds prepaid account number [REDACTED] was established in the name of Joann [REDACTED] on March 30, 2012 for billed telephone number (413) [REDACTED]. According to Securus's records, forty-eight (48) inmate-initiated collect calls originating from a facility served by Securus were accepted at billed telephone numbers authorized by Ms. [REDACTED] for prepaid account number [REDACTED] beginning March 30, 2012 through June 30, 2012. Securus's records confirm positive acceptance was made and the collect calls were accepted by an individual with access to each billed telephone number. For Ms. [REDACTED] review a copy of her billed call detail history, in addition to her transaction history has been attached.

Securus records confirm that Ms. [REDACTED] has previously authorized additional billed telephone numbers for her prepaid account number [REDACTED]. As such, she has assumed responsibility for any charges incurred by each billed telephone number her has authorized for prepaid account number [REDACTED]. For Ms. [REDACTED] convenience, a listing of all billed telephone numbers which she has previously authorized is provided below.

Additional Billed Telephone Number Profile for Prepaid Account No. [REDACTED]			
Telephone Number	Date Added	Date Removed	Date Last Call Processed
(413) [REDACTED]	March 30, 2012	-	June 30, 2012
(413) [REDACTED]	March 30, 2012	-	June 18, 2012

Regarding Ms. [REDACTED] concern related to minimum funding amounts and fees assessed to fund an account with Securus, she should note that the minimum payment and the transaction fees are only applicable if funding the account using a credit/debit card or check payment; via the Integrated Voice Response system ("IVR"), Securus's website, or through a Customer Service Representative.

Should a consumer desire to avoid transaction fees, they may fund a prepaid or direct billed account by submitting a check or money order via U.S. postal mail to Securus. When a consumer chooses to mail a payment to Securus, they are instructed to write his/her account number and billed telephone number on the payment to ensure that the payment is posted to the correct account. For Ms. [REDACTED] records, her prepaid account number is [REDACTED] payments should be mailed to: Payments/Securus Technologies, P.O. Box 650757, Dallas, TX 75265-0757. For Ms. [REDACTED] convenience, Securus provides the following listing of payment options available to consumers with the corresponding fees associated with each option:

Pay Method	Funding Fee	Minimum Payment	Funds Availability	Payment Address/Contact Method
Automated IVR System	\$6.95	\$25.00	Within one (1) hour	800-844-6591
Securus Representative	\$6.95	\$25.00	Within one (1) hour	800-844-6591
Website	\$6.95	\$25.00	Within one (1) hour	www.securustech.net
MoneyGram	MoneyGram assessed fee	none	five (5) to eight (8) hours	To find the nearest MoneyGram agent, consumers may call 1-800-926-9400 or visit www.moneygram.com/locations
Western Union (Quick Collect)	Western Union assessed fee	none	five (5) to eight (8) hours	To find the nearest Western Union agent, consumers may call 1-800-325-6000 or visit www.westernunion.com/locator/
US Postal Service First Class Mail (regular mail)	none	none	seven (7) to ten (10) days	Securus Correctional Billing Services P.O. Box 650757 Dallas, Texas 75265-0757
Overnight USPS Payment (e.g. USPS Priority Mail) for sending checks and money money orders overnight only	none	none	twenty-four (24) hours from the time payment is processed	J.P. Morgan Chase Attn: LB Dept 650757 14800 Frye Rd., 2nd Floor Ft. Worth, Texas 76155-2732

Ms. [REDACTED] additionally states that she has experienced difficulty in reaching a Securus customer service representative to assist her when attempting to have her concerns addressed. Securus sincerely regrets that Ms. [REDACTED] has experienced difficulty in trying to reach a customer service representative. Due to such feedback from our consumers, please note that changes are continuously



implemented to Securus's Interactive Voice Response system ("IVR") that assist consumers in navigating through the available options when they contact Securus. These changes have provided consumers a greater variety of relevant self-service options, which were not available through our previous IVR. Additionally, there are numerous 'opt-out' opportunities offered throughout the IVR, allowing consumers to easily connect with a customer service representative. Securus hopes Ms. [REDACTED] is able to secure contact with a customer service representative with greater efficiency than during her past experiences; however, should Ms. [REDACTED] have any issues when navigating through the IVR, she has the option to be transferred to a live representative by:

- 1) first, entering their account passcode,
- 2) then, pressing option '4' for Other Requests.

In the event that Ms. [REDACTED] does not know her passcode, she has the option to be transferred to a live representative by:

- 1) first, pressing '3' for More Options,
- 2) then, pressing '4' for Billing Questions.

In conclusion, Securus's investigation finds Ms. [REDACTED] prepaid account number [REDACTED] has been accurately billed as a result of the positive acceptance of inmate-initiated collect calls beginning March 30, 2012 through June 30, 2012. Should Ms. [REDACTED] require any further assistance, she may contact Securus with any account related questions twenty-four (24) hours a day, seven (7) days a week through any of the following methods:

Securus Customer Contact Options	
Telephone	(800) 844-6591
E-mail	customerservice@securustech.net
Website	www.securustech.net
Interactive Web Chat	http://weblink.securustech.net/WebChatASP/Default.aspx
US Mail	Securus Correctional Billing Services P.O. Box 1109 Addison, Texas 75001

For Ms. [REDACTED] convenience, in addition to the information provided herein regarding Securus's services, a copy of the Friends & Family Telephone Service Guide has been attached for her convenient review.

If there should be any further questions regarding this issue, please contact me at (972) 277-0300.

Sincerely,

Eric Ramey
Compliance Analyst, Regulatory Affairs

Enclosures: (3)

cc: Ms. Joann [REDACTED]
[REDACTED]
Adams, Massachusetts 01220



SECURUSTM

TECHNOLOGIES, INC.

June 3, 2012

Massachusetts Office of the Attorney General
c/o Middlesex Community College Law Center
Consumer Protection Program
33 Kearney Square
Lowell, Massachusetts 01852-1987

VIA Facsimile: (978) 441-1749

RE: Ms. Joy [REDACTED]
Case Number: [REDACTED]

Dear Sir(s):

Securus Technologies, Inc., with its customer service department, Correctional Billing Services, (collectively, "Securus") hereby responds to Ms. Joy [REDACTED] complaint concerning costs associated with her Securus prepaid account. Securus is an inmate telephone service provider that handles inmate collect calls nationwide, including calls from the Billerica House of Corrections where Ms. [REDACTED] states her spouse is located.

In Ms. [REDACTED] complaint she states she has a Securus prepaid account linked to cell phone number (978) [REDACTED] that requires a \$25.00 account minimum, including a \$6.95 processing fee. Ms. [REDACTED] notes in her complaint that the phone plan is under her daughter's name, Allura [REDACTED]. Ms. [REDACTED] states there is a problem as extra money is taken from the account. She mentions she was finally able to reach a Securus representative, however, with no results, and was told there was a newly added administrative fee. She further states she is sent messages when her account balance is low, but has not received a notice concerning a new fee. Ms. [REDACTED] states she wants "the money" put back on her account.

An investigation into this matter finds a Securus prepaid AdvanceConnect Account for billed telephone number (978) [REDACTED] was established in the name of Ellura [REDACTED] on August 22, 2011. A review of the customer account notes show on September 5, 2011 a customer inquiry was made concerning the account balance. The customer was advised it went towards calls and there was a discussion on the cost of calling rates. The customer stated they had been given wrong rates, however, Securus customer records do not show there had been any previous customer inquiries on calling rates. On October 20, 2011, customer records note Ellura [REDACTED] inquired about rates for the Billerica facility. On March 31, 2012 customer records state the customer called inquiring about her balance and the representative reviewed the balance, including the charge of a \$2.99 wireless administration fee. The customer demanded to speak to a supervisor saying it was illegal for Securus to charge fees without her being notified. An explanation concerning the fee and Securus' notification was provided to Ms. [REDACTED] however, she became upset and hung up on the representative.

Ms. [REDACTED] further states that she has been assessed fees and taxes which were not previously disclosed by Securus. Ms. [REDACTED] should be advised that Securus's Automated Operator System ("AOS") informs consumers that additional telecom and sales taxes may apply in each rate quote. As explained herein, consumers are provided with the option to hear a rate quote inmate-initiated collect call attempt processed by Securus. Accordingly, when the called party presses the option for a rate quote they will hear:

[REDACTED]



SECURUS

TECHNOLOGIES

"This call will cost ☐ dollars and ☐ cents for the first minute and ☐ ☐ [dollars] ☐ [cents] for each [additional] minute, plus any applicable telecom and sales taxes."

For Ms. ☐ convenience, a listing of Securus's fee descriptions has been attached.

Regarding Ms. ☐ concern related to minimum funding amounts and fees assessed to fund an account with Securus, she should note that the minimum payment and the transaction fees are only applicable if funding the account using a credit/debit card or check payment; via the Integrated Voice Response system ("IVR"), Securus's website, or through a Customer Service Representative.

Should a consumer desire to avoid transaction fees, they may fund a prepaid or direct billed account by submitting a check or money order via U.S. postal mail to Securus. When a consumer chooses to mail a payment to Securus, they are instructed to write his/her account number and billed telephone number on the payment to ensure that the payment is posted to the correct account. For Ms. ☐ records, her prepaid account number is ☐. All payments should be mailed to: Payments/Securus Technologies, P.O. Box 650757, Dallas, TX 75265-0757. For Ms. ☐ convenience, Securus provides the following listing of payment options available to consumers with the corresponding fees associated with each option:

Pay Method	Funding Fee	Minimum Payment	Funds Availability
U.S. Mail	none	none	seven (7) to ten (10) days
Automated IVR System	\$6.95	\$25.00	Within one (1) hour
Securus Representative	\$6.95	\$25.00	Within one (1) hour
Website	\$6.95	\$25.00	Within one (1) hour
MoneyGram	MoneyGram assessed fee	none	five (5) to eight (8) hours
Western Union	WU assessed fee	none	five (5) to eight (8) hours

Regarding Ms. ☐ request for copies of her detailed call statements, Securus advises Ms. ☐ that monthly call detail for prepaid accounts is not automatically mailed or provided to the consumer; however, consumer's may contact Securus to request a mailed copy of their monthly call detail, which will be provided at no cost to the consumer. Consumers must provide their full name, registered phone number, pin and the month(s) which they are requesting copies of their call detail. For Ms. ☐ convenience, she may provide the requested information through any of the following contact options, which are all available twenty-four (24) hours a day, seven (7) days a week:

Securus Customer Contact Options	
Telephone	(800) 844-6591
Email	customerservice@securustech.net
Website	www.securustech.net
Interactive Web Chat	http://weblink.securustech.net/WebChatASP/Default.aspx
US Mail	Securus Correctional Billing Services P.O. Box 1109 Addison, Texas 75001



SECURUS
TECHNOLOGY

For Ms. [REDACTED] convenience, she will find attached copies of her billed call history for the period beginning September 1, 2011 through May 26, 2012, in addition to copies of her account statements for March 2012, April 2012 and May 2012.

In conclusion, Securus's investigation finds that prepaid account number [REDACTED] has been accurately billed as a result of the positive acceptance of seventy-six (76) collect calls between October 20, 2011 and May 26, 2012 for billed telephone number (978) [REDACTED]. As positive acceptance has been verified, the disputed charges have been sustained for Ms. [REDACTED] account. For Ms. [REDACTED] convenience, a copy of her transaction history, for billing and payment activity has also been attached.

In conclusion, Securus's investigation finds Ms. [REDACTED] account number [REDACTED] currently clear to receive calls.

Should Ms. [REDACTED] require any further assistance, she may contact Securus with any account related questions twenty-four (24) hours a day, seven (7) days a week through any of the communication methods listed herein.

If there are any further questions regarding this complaint, please contact me at (972) 277-0300.

Sincerely,

Eric Ramsey
Regulatory Compliance Analyst

Attachment(s): 6

cc: Ms. Joy [REDACTED]
[REDACTED]
Lowell, Massachusetts 01851

[REDACTED]



October 1, 2013

Federal Communications Commission
Consumer & Governmental Affairs Bureau
Attn: Sharon Bowers, Division Chief
Consumer Inquiries & Complaints Division
445 12th Street, SW
Washington, D.C. 20554

VIA FCC Web Interface

RE: Mr. Randall [REDACTED] - (781) [REDACTED]
Complaint No.: [REDACTED]

Dear Ms. Bowers:

Securus Technologies, Inc., with its customer service department, Correctional Billing Services, (collectively, "Securus"), hereby responds to Mr. Randall [REDACTED] regarding the cost to accept calls from the Dimmit County Jail located in Carrizo Springs, Texas. Securus is an inmate telephone service provider that handles inmate collect calls from this confinement facility.

Mr. [REDACTED] expresses concern regarding the cost of the rates to accept calls to telephone number (781) [REDACTED] from a Friend or Family member incarcerated at the Dimmit County Jail. It should be noted, Mr. [REDACTED] is not disputing charges associated with the telephone number aforementioned, but merely questioning the cost of the rates.

Securus periodically receives inquiries from consumers asking why rates are higher than local and long distance calls not made from a correctional facility. The cost of calls from inmate telephone systems is higher because there are additional processes that must take place in order to process and complete calls from an inmate. In order to support operation of the confinement facilities, Securus works with the confinement facility's management to customize the system applications to provide call control, inmate telephone activity tracking, and investigation and administrative tools. Because there are additional costs incurred to develop and maintain these systems, the rates charged by Securus, as well as its competitors, to process inmate calls are higher than those calls made from a residential or business line. In order to protect the public, preserve security and prevent fraudulent activities, inmate access to 800 numbers, directory assistance, live operators, 700 and 976 services is prohibited. In addition, correctional institution administrators often limit the number of calls and/or duration of calls made by inmates of the facility. Rates are determined by the calling areas of regions. Mileage is not the primary determining factor for rates and in many situations, a long distance call can be a call to across the street or to a neighbor next door. For rating purposes, calls are intraLATA or interLATA calls. Calling areas are largely based on LATA ("Local Access Transport Area") lines that were determined during the 1984 divestiture of AT&T. These lines determine if a call is within a LATA (IntraLATA) or outside of a LATA (InterLATA). Calling areas are structured by Area Code and exchange numbers (NPA-NXX), in other words the first 6 digits of the phone number.

It is important for Mr. [REDACTED] to note that prior to the acceptance of all inmate-initiated collect calls processed by Securus, the consumer is presented with multiple options requiring an interactive response through the AOS. When the consumer initially receives an inmate-initiated collect calls processed by



Securus, the AOS presents the consumer with interactive options to: accept the call, listen to a rate quote, block all future calls from Securus-served facilities, and reject the call before charges apply. Securus strongly recommends all consumers select the option to listen to the rate quote prior to accepting any call, in the event that a rate change may have occurred. If a consumer believes the rate is too high, they may decline the call. Consumers are not obligated to accept inmate-initiated collect calls and if the consumer chooses to decline the call, no charges will be incurred. If a consumer responded to the prompt to accept the call prior to listening to the prompt to listen to a rate quote, then he/she will bypass the rate quote option. Securus recommends that consumer's should listen to all of the prompted options presented by the AOS prior to selecting an option. Once a consumer authorizes his/her acceptance of the call through the AOS by means of active positive acceptance, the consumer is responsible for payment of the charges incurred for the completed call.

Provided for Mr. [REDACTED] records, is the terminating location, Saugus, Massachusetts, which is the locality defined for billed telephone number (781) [REDACTED] by the North American Numbering Plan Administration ("NANPA") that is governed by the Federal Communications Commission ("FCC"). The calls from the Dimmit County Jail located in Carrizo Springs, Texas to Saugus, Massachusetts are classified as "InterLATA/InterState" calls and the rates are as follows:

Dimmit County Jail in Carrizo Springs, Texas	
Operator Service Charge (per call):	3.95
Usage Charge (per minute):	0.89

For a fifteen (15) minute call, the charge would be \$17.30 plus applicable regulatory fees.

If there should be any further questions regarding this issue, please contact me at (972) 277-0472.

Sincerely,

Cameshia Davis

Cameshia Davis
Regulatory Compliance Analyst

cc: Randall [REDACTED]
[REDACTED]
Melrose, Massachusetts



SECURUS™
TECHNOLOGIES

May 8, 2013

Massachusetts State Department of Telecommunications
Attn: Janice McCoy
1000 Washington Street Room 820
Boston, MA 02110-6500

VIA Email: Janice.mccoy@state.ma.us

RE: Ms. Pamela [REDACTED] (508) [REDACTED]
Case# [REDACTED]

Dear Ms. McCoy:

Securus Technologies, Inc., with its customer service department, Correctional Billing Services, (collectively, "Securus") hereby responds to Pamela [REDACTED] complaint regarding calls from the Barnstable County Corrections Facility in Bourne, Massachusetts. Securus is an inmate telephone service provider that handles inmate calls from this confinement facility.

According to Ms. [REDACTED] complaint, she contacted Securus between the months of March and April regarding her LEC billed charges, which totaled around \$500.00. The customer states she had a three-way conversation with Securus and Verizon during which time she agreed to enroll in Securus' prepaid account and requested Verizon place a collect call block on her LEC billed account.

Ms. [REDACTED] mentions in her complaint, that Verizon has no record of such a three-way call nor is there a block on her LEC account. In addition, she states she accepted calls from 3/19/13 to 4/4/13 that should not have been LEC billed as she indicates she established a prepaid account. At this time, she is requesting an investigation regarding this matter.

To provide some background about our business, inmate-initiated collect calls may be billed through a consumer's Local Exchange Carrier ("LEC"), as a convenience to the consumer. When an inmate attempts to place a collect call to a consumer, the call is processed once the system has established that the consumer's LEC has a billing and collection agreement with Securus. Once Securus has a means to bill the call, a consumer is contacted by Securus through an automated operator system ("AOS") stating that an inmate is attempting to place a collect call to the consumer. The AOS provides the consumer with the name of the inmate placing the call, as well as the confinement facility where the inmate is located. Consumers are then offered several options requiring their confirmation by pressing a corresponding key on their telephone keypad. The options offered to consumers include: a prompt to press a key to hear the rates applicable to the call, a prompt to press a key to prevent all future calls from the facility in question, a prompt to press a key to accept the call and a prompt to press a key to refuse the call. This system



SECURUS[™]
TECHNOLOGIES

ensures consumers are given the opportunity to access cost associated information prior to accepting a call and incurring charges. Equally important, this system of positive acceptance ensures that a consumer will not be inadvertently billed for calls they do not wish to receive.

When a consumer initially accepts a collect call from the facility serviced by Securus, an account is established so that future inmate calls may then be processed and billed. The associated collect call charges will appear on the consumer's LEC bill indicating which charges are billed on behalf of Securus with details of the date, time, location, and minutes for each of the relevant calls. When a consumer is billed by their LEC for collect call charges, they do not receive any direct correspondence from Securus regarding their charges.

It is important for Ms. [REDACTED] to note that prior to the acceptance of all inmate-initiated collect calls processed by Securus, the consumer is presented with multiple options requiring an interactive response through the AOS. When the consumer initially receives an inmate-initiated collect calls processed by Securus, the AOS presents the consumer with interactive options to: accept the call, listen to a rate quote, block all future calls from Securus-served facilities, and reject the call before charges apply. Securus strongly recommends all consumers select the option to listen to the rate quote prior to accepting any call, in the event that a rate change may have occurred. If a consumer believes the rate is too high, they may decline the call. Consumers are not obligated to accept inmate-initiated collect calls and if the consumer chooses to decline the call, no charges will be incurred. If a consumer responded to the prompt to accept the call prior to listening to the prompt to listen to a rate quote, then he/she will bypass the rate quote option. Securus recommends that consumer's should listen to all of the prompted options presented by the AOS prior to selecting an option. Once a consumer authorizes his/her acceptance of the call through the AOS by means of active positive acceptance, the consumer is responsible for payment of the charges incurred for the completed call.

Investigation into this matter finds that Ms. [REDACTED] began receiving calls to telephone number (508) [REDACTED] to her LEC billed account beginning January 16 through April 4, 2013, from the Barnstable County Corrections Facility in Bourne, Massachusetts. Customer records indicate as of February 28, 2013, Securus temporarily blocked LEC billing from the aforementioned facility from February 28 through March 18th, because the facility was not eligible to be LEC billed during that time. It should be noted, effective May 15, 2013, Barnstable County Corrections will no longer allow LEC billing as a billing method; however, this does not change any rates being charged and is solely a change in the method by which collect call charges are billed. Ms. [REDACTED] has the option of establishing a Direct Bill account, or open a prepaid Advance Connect account with Securus. According to company records, a prepaid Advance Connect account [REDACTED] was established on April 17, 2013, however, Ms. [REDACTED] did not fund the account; therefore, calls could not be billed to her prepaid account. Further, Securus records indicate, she disputed calls accepted from March 19 through April 4, 2013 with her LEC (Verizon) and she refused to pay for the calls in question totaling [REDACTED]. As a result, Ms. [REDACTED] has an outstanding balance of [REDACTED] that was transferred to her Securus prepaid account [REDACTED].



SECURUS™
TECHNOLOGIES

which Ms. [REDACTED] will need to pay in addition to funding her prepaid account in order to receive calls from any facility Securus serves.

In addressing the issue of a three-way call mentioned by Ms. [REDACTED] that took place between Verizon and Securus, Securus has no record of such call and as previously stated, her account was converted to a prepaid account on April 17th.

Securus regrets any confusion Ms. [REDACTED] may have experienced in an effort to receive calls to her prepaid account.

Sincerely,

Cameshia Davis

Cameshia Davis
Regulatory Complaints Analyst

cc: Pamela [REDACTED]
[REDACTED]

Dennis, MA 02670



May 15, 2013

Massachusetts State Department of Telecommunications
Attn: Janice McCoy
1000 Washington Street Room 820
Boston, MA 02110-6500

VIA Email: Janice.mccoy@state.ma.us

RE: Mr. Stanley [REDACTED] (508) [REDACTED]
Case# [REDACTED]

Dear Ms. McCoy:

Securus Technologies, Inc., with its customer service department, Correctional Billing Services, (collectively, "Securus") hereby responds to Stanley [REDACTED] complaint regarding calls from the Bristol County House of Corrections located in Dartmouth, Massachusetts. Securus is an inmate telephone service provider that handles inmate calls from this confinement facility.

According to Mr. [REDACTED] complaint, he established a pre-paid account with Securus to receive collect calls from an inmate housed at the Bristol County House of Corrections located in Dartmouth, Massachusetts. Mr. [REDACTED] indicates around 4/04/13, he began experiencing poor quality of service when attempting to accept collect calls from the aforementioned facility. He states the phone rings and he hears the standard recording, "This is a call from an inmate of the Bristol County House of Corrections," and then hears the party state his name in his own voice. The pre-recorded information is followed by "This call is being disconnected as no third-party calls are allowed" and the call is disconnected.

Mr. [REDACTED] states he has contacted Securus more than nine (9) times since this problem began and each time he was promised the issue would be resolved within 48 hours. On 4/09/13, he states three (3) calls were received and disconnected; further, he advised more than 48 hours had passed to correct the problem. As such, Mr. [REDACTED] states he called Securus Customer Service on the following dates: 4/4/13; 4/09/13; 4/10/13; 4/11/13; 4/12/2013; however, the ticket was open with no resolution. At that time, he states he requested to speak to a supervisor and was informed he could not, but a message would be passed to the supervisor referencing his problem.

Mr. [REDACTED] indicates he asked to speak to a supervisor and spoke to [REDACTED] who advised she would forward him to the supervisor's voice mail. Mr. [REDACTED] advised he was placed on hold, and the call kicked back into the automated system - he continued to stay on the line, and approximately one hour later, he mentioned he was connected to [REDACTED]. He states he was again placed on hold for approximately 30 minutes. Further, [REDACTED] phoned back to Mr. [REDACTED] and left a voice message stating the ticket was open and despite what he was informed, the ticket was being worked and to disregard the 24-hour promise to correct the problem.



SECURUSTM
TECHNOLOGIES

Mr. [REDACTED] is extremely upset and indicates this entire experience is unacceptable. He states he contacted the company and received the runaround with no results or resolution. At this time, he is requesting an investigation regarding this matter.

To provide some background about our business, inmate collect calls are either billed through a consumer's local telephone company, as a convenience to the consumer, or as prepaid calls through payments made directly to Correctional Billing Services. Once an inmate attempts to place a call to a consumer, whose local telephone company has a billing and collection agreement with AT&T, the call is processed. When these consumers initially accept an inmate call, an account is automatically established so that future inmate calls may be processed and billed. The collect call charges will appear on the consumer's local telephone bill, which will indicate the date, time, location, and minutes of the relevant calls and that they are billed on behalf of AT&T. No direct correspondence is received from CBS regarding their collect call charges. Consumers whose local telephone company does not have such a billing and collection agreement or those consumers that prefer not to be billed through their local telephone company must contact CBS to establish an account and make payment arrangements at that time. Once a collect call is received from an inmate and CBS has a means to bill the call, consumers are offered several options, whereby indicating their choice by pressing a specified key on their telephone keypad. One option is to hear the cost of the call. Another option is to either accept the call or not accept the call.

Investigation into this matter revealed on April 2, 2012, Mr. [REDACTED] established a prepaid account [REDACTED] associated with telephone number (508) [REDACTED]. Company records indicate Mr. [REDACTED] called Securus Customer Service on April 4, 2013, regarding the system terminating his calls for 3-way call detection when he attempts to accept a call. The issue was escalated to Securus' back office department on April 5, 2013, where ticket# [REDACTED] was created and submitted to the technical support department to investigate. In addressing the Commissions question regarding the length of time it took to escalate Mr. Johnson's ticket, as previously stated, the ticket was escalated on April 5th, which is the next business day.

Customer records indicate on April 9, 2013, Mr. [REDACTED] called to check the status of his ticket and was informed the issue was being worked and there were no updates at that time. On April 10, 2013, Mr. [REDACTED] called to check the status of his ticket and was advised by a Securus representative [REDACTED] that the issue was partially worked, but it was discovered there was an issue regarding no positive acceptance. As a result, a second ticket# [REDACTED] was created regarding this matter. Customer records indicate on April 11, 2013, [REDACTED] contacted Mr. [REDACTED] at telephone number (508) [REDACTED] and left a voice message advising the issue was sent to Securus' IT Network Engineers in an effort to resolve the problem.

Mr. [REDACTED] should note, due to the complexity of his issue, various departments were involved in an effort to resolve his complaint. According to our findings, his calls were not routing correctly through the various carriers used by Securus to reach the intended end user (Friends & Family) at their final destination. As a result, there was a click sound being detected during the connecting of the call, which caused Mr. [REDACTED] calls to terminate for 3-way call detection. In an effort to correct the problem, on May 1, 2013, Securus changed the way the calls were being routed which has since corrected the issue.



SECURUS
TECHNOLOGIES

Customer records indicate Mr. [REDACTED] had five (5) completed calls accepted from April 30, 2013, through May 12, 2013. At this time, Mr. [REDACTED] issue has been resolved.

Lastly, Mr. [REDACTED] made the statement when contacting Securus Customer Care he was extremely upset and indicates this entire experience is unacceptable. He states he contacted the company and received the runaround with no results or resolution. Securus apologizes for any discourteous or inaccurate expectations that may have been provided by the representatives during his contact with Securus' Customer Service department. Unfortunately, the technical issues Mr. [REDACTED] experienced took longer to resolve due to the need to isolate the underlining issues.

If there should be any additional questions regarding this correspondence, please contact me at (972) 277-0472.

Sincerely,

Cameshia Davis

Cameshia Davis
Regulatory Complaints Analyst

cc: Stanley [REDACTED]
[REDACTED]
Taunton, MA 02780



SECURUSTM
TECHNOLOGIES

January 28, 2014

Federal Communications Commission
Consumer & Governmental Affairs Bureau
Attn: Sharon Bowers, Division Chief
Consumer Inquiries & Complaints Division
445 12th Street, SW
Washington, D.C. 20554

VIA FCC Web Interface

RE: Elizabeth [REDACTED] (216) [REDACTED]

Complaint No.: [REDACTED]

Dear Ms. Bowers:

Securus Technologies, Inc., with its customer service department, Correctional Billing Services, (collectively, "Securus"), hereby responds to Ms. [REDACTED]'s complaint regarding the cost to accept calls from the Bristol County Faunce Corner located in N. Dartmouth, Massachusetts. Securus is an inmate telephone service provider that handles inmate collect calls from this confinement facility.

According to Ms. [REDACTED] complaint, she expressed concerns regarding the cost of the rates to accept calls to telephone number (216) [REDACTED] from the Bristol County Faunce Corner. It is Securus' understanding Ms. [REDACTED] is not disputing charges associated with the telephone number aforementioned, but questioning why the new rates have not been implemented according to the FCC's recent ruling in WC in Docket No. 12-375 involving interstate rates for inmate calling services.

To provide some background about our business, Securus periodically receives inquiries from consumers asking why rates are higher than local and long distance calls not made from a correctional facility. The cost of calls from inmate telephone systems is higher because there are additional processes that must take place in order to process and complete calls from an inmate. In order to support operation of the confinement facilities, Securus works with the confinement facility's management to customize the system applications to provide call control, inmate telephone activity tracking, and investigation and administrative tools. Because there are, additional costs incurred to develop and maintain these systems, the rates charged by Securus, as well as its competitors, to process inmate calls are higher than those calls made from a residential or business line. In order to protect the public, preserve security and prevent fraudulent activities, inmate access to 800 numbers, directory assistance, live operators, 700 and 976 services is prohibited. In addition, correctional institution administrators often limit the number of calls and/or duration of calls made by inmates of the facility.

It is important for Ms. [REDACTED] to note that prior to the acceptance of all inmate-initiated collect calls processed by Securus, the consumer is presented with multiple options requiring an interactive response through the AOS. When the consumer initially receives an inmate-initiated collect call processed by Securus, the AOS presents the consumer with interactive options to: accept the call, listen to a rate quote, block all future calls from Securus-served facilities, and reject the call before charges apply. Securus



SECURUSTM
TECHNOLOGIES

strongly recommends all consumers select the option to listen to the rate quote prior to accepting any call, in the event that a rate change may have occurred. If a consumer believes the rate is too high, they may decline the call. Consumers are not obligated to accept inmate-initiated collect calls and if the consumer chooses to decline the call, no charges will be incurred. If a consumer responded to the prompt to accept the call prior to listening to the prompt to listen to a rate quote, then he/she will bypass the rate quote option. Securus recommends that consumers should listen to all of the prompted options presented by the AOS prior to selecting an option. Once a consumer authorizes his/her acceptance of the call through the AOS by means of active positive acceptance, the consumer is responsible for payment of the charges incurred for the completed call.

The FCC released a Report and Order and Further Notice of Proposed Rulemaking on September 26, 2013 in WC Docket No. 12-375 regarding, among other things, the "interstate" rates for inmate calling services. Interstate calling applies to calls originating in one state and terminating in another state. The new FCC rules do not become effective until 90 days after publication in the Federal Register. The new FCC rules were published on November 13, 2013 and therefore do not become effective until February 11, 2014. Once the FCC's proposed rules are in effect, they will only apply to interstate rates.

Please note calls to telephone number (216) [REDACTED] from the Bristol County Faunce Corner are interstate calls, i.e. calls that originate in one state and terminate within another state. The FCC rules referenced above would be applicable to these calls once the rule is in effect.

If there are any further questions regarding this complaint, please contact me at (972) 277-0472.

Sincerely,

Cameshia Davis

Cameshia Davis
Regulatory Compliance Analyst

cc: Ms. Elizabeth [REDACTED]
[REDACTED]
Medford, MA 02155



SECURUS™
TECHNOLOGIES

April 19, 2011

Mr. Stallings,

Securus Technologies, Inc., with its customer service department, Correctional Billing Services, (collectively, "Securus"), hereby responds to Mr. Douglas [REDACTED] complaint regarding the rates for collect calls accepted from the Franklin County Corrections Facility located in Greenfield, Massachusetts. Securus is an inmate telephone service provider that handles inmate collect calls from this confinement facility.

Securus periodically receives inquiries from consumers asking why rates are higher than local and long distance calls not made from a correctional facility. The cost of calls from inmate telephone systems is higher because there are additional processes that must take place in order to process and complete calls from an inmate. In order to support operation of the confinement facilities, Securus works with the confinement facility's management to customize the system applications to provide call control, inmate telephone activity tracking, and investigation and administrative tools. Because there are additional costs incurred to develop and maintain these systems, the rates charged by Securus to process inmate calls are higher than those calls made from a residential or business line. In order to protect the public, preserve security and prevent fraudulent activities, inmate access to 800 numbers, directory assistance, live operators, 700 and 976 services is prohibited. In addition, correctional institution administrators often limit the number of calls and/or duration of calls made by inmates of the facility. As a provider of inmate calling services, Securus' rates are subject to the oversight of the Federal Communications Commission as well as most state Public Service Commissions.

Rates are determined by the calling areas of regions. Mileage is not the primary determining factor for rates and in many situations, a long distance call can be a call to across the street or to a neighbor next door. For rating purposes, calls are considered either intrastate or interstate. Intrastate calls occur within the boundaries of one state and are rated as local, intraLATA or interLATA calls. Calling areas are largely based on LATA (Local Access Transport Area) lines that were determined during the 1984 divestiture of AT&T. These lines determine if a call is within a LATA (IntraLATA) or outside of a LATA (InterLATA). Calling areas are structured by Area Code and exchange numbers, in other words the first 6 digits of the phone number.

Local calls are those to telephone exchanges where a long distance charge (also called "toll") is not incurred. A call within the boundaries of one LATA not rated as local is considered an intraLATA call, whereas a call between two LATAs is an interLATA call. Interstate calls are those made to another state and usually considered long distance calls as well.

As rates are based on the above described structure, the rates may differ for each location where Mr. [REDACTED] is attempting to call. Unfortunately, Mr. [REDACTED] did not specify where he is attempting to place a call so we are unable to provide the specific rates for a call. As such, the following information is provided as an example of a possible call to Washington D.C. Calls placed from the Franklin County Corrections Institution in Greenfield, Massachusetts to Washington D.C., are classified as "Interstate" calls and the rates are as follows:

Franklin County Corrections Facility
Greenfield, Massachusetts

Operator Service Charge: \$3.95 (per call)
Usage Charge: \$0.89 (per minute)

For a fifteen (15) minute call, the charge would be \$17.30, plus applicable taxes and fees.



SECURUSTM
TECHNOLOGIES

Mr. [REDACTED] should note that prior to the acceptance of any call that Securus processes, the consumer has several options that they may choose to listen to before they accept the call from the inmate. When the consumer picks up the call placed by an inmate, the consumer has the option to get a rate quote before accepting the call. We advise all customers to select the option to hear the rates, before accepting any call in the event that a rate change may have occurred. If a consumer feels the rate is too high they may decline the call because there is no obligation to accept and no charges will be incurred. If a consumer responded to the prompt to accept the call before the prompt to listen to the rates and the cost of the call, then he or she would have bypassed the rate option. The consumer should listen to all of the prompts provided before making a selection. Once a customer makes a positive acceptance of the call, it is the customer's responsibility for payment of the charges incurred during the call.

The complaint filed by Mr. [REDACTED] also states that he has experienced difficulty in contacting Securus, as he does not have the ability to contact our offices through our customer services representatives or online. In an effort to address this concern, Securus contacted the Franklin Corrections Facility for clarification on how an inmate may obtain information regarding the telephone service available at their facility. Securus confirmed with the facility Superintendent that inmates housed at the Franklin County Corrections Facility should contact their case worker directly for any rate requests, service issues or general concerns.

If there are any further questions regarding this complaint, please contact me at 972-277-0300.

Sincerely,

Eric Ramey
Regulatory Compliance Analyst

Co: Douglas [REDACTED]
[REDACTED]
Greenfield, MA 01301



February 2, 2011

Dear Mr. Stallings,

Securus Technologies, Inc., with its customer service department, Correctional Billing Services, (collectively, "Securus"), hereby responds to Mary [REDACTED] complaint regarding cut off calls involving collect calls accepted from the Essex County Middleton Jail and House of Corrections located in Middletown, MA. Securus is an inmate telephone service provider that handles inmate collect calls from this confinement facility.

According to Ms. [REDACTED] complaint, she indicates she has experienced cut off calls. At this time, she would like this matter investigated and she would like credit for her cut off calls.

Investigation into this matter finds Prepaid account number [REDACTED] was established in the name of Mary [REDACTED] on September 10, 2008 for billed telephone number 978 [REDACTED]

In 2010, Ms. [REDACTED] received calls from Essex County Middleton and also Essex County Lawrence facilities. The last call she received was September 1, 2010. Her account was dormant until November 22, 2011 when she called to pay her past due balance and fund her account. She received her first call from her loved one in Essex County Middleton on November 23, 2011.

A review of Ms. [REDACTED] records indicate she had six calls that were terminated for third party calling. However, only two of those calls were of a long enough call duration to be considered billable. A complete listing of Ms. [REDACTED] calls is below. The two calls terminated for third party calling are highlighted (12/16/2011 at 20:15:33 and 01/09/2012 at 20:24:16).

Call Date	Call Time	Orig. ANI	Orig. City	Orig. State	Term. ANI	Term. City	Term. State	Min.	Charge	Tax	Total
11/23/2011	18:44:18	978 [REDACTED]	DANVERS	MA	978 [REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
11/25/2011	20:21:37	978 [REDACTED]	DANVERS	MA	978 [REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
11/26/2011	20:55:10	978 [REDACTED]	DANVERS	MA	978 [REDACTED]	LAWRENCE	MA	8	\$3.30	\$0.21	\$3.51
11/26/2011	21:12:13	978 [REDACTED]	DANVERS	MA	978 [REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
11/28/2011	18:57:07	978 [REDACTED]	DANVERS	MA	978 [REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
12/3/2011	13:30:54	978 [REDACTED]	DANVERS	MA	978 [REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
12/3/2011	20:44:14	978 [REDACTED]	DANVERS	MA	978 [REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
12/4/2011	15:12:50	978 [REDACTED]	DANVERS	MA	978 [REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
12/6/2011	21:30:53	978 [REDACTED]	DANVERS	MA	978 [REDACTED]	LAWRENCE	MA	29	\$5.40	\$0.34	\$5.74
12/8/2011	19:25:50	978 [REDACTED]	DANVERS	MA	978 [REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85

[REDACTED]

[REDACTED]

[REDACTED]



SECURUSTM
TECHNOLOGIES

12/10/2011	19:54:45	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	15	\$4.00	\$0.25	\$4.25
12/10/2011	20:10:02	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
12/11/2011	19:17:34	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
12/12/2011	21:00:33	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
12/16/2011	20:15:33	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	13	\$3.80	\$0.24	\$4.04
12/16/2011	20:34:30	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
12/17/2011	19:03:05	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	20	\$4.50	\$0.29	\$4.79
12/17/2011	19:25:36	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
12/18/2011	13:15:17	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
12/19/2011	20:00:44	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
12/19/2011	21:01:19	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
12/20/2011	21:28:17	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
12/22/2011	19:09:02	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
12/23/2011	20:13:25	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
12/24/2011	19:36:56	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
12/25/2011	15:13:46	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
12/25/2011	20:06:19	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	12	\$3.70	\$0.24	\$3.94
12/25/2011	20:19:29	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
12/26/2011	18:33:35	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	25	\$5.00	\$0.32	\$5.32
12/26/2011	20:05:31	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
12/27/2011	20:41:52	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
12/28/2011	18:36:52	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
12/30/2011	20:35:55	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
12/31/2011	19:10:13	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
12/31/2011	20:48:18	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
1/1/2012	15:34:24	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
1/3/2012	19:36:20	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	1	\$2.60	\$0.17	\$2.77
1/3/2012	19:37:42	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	27	\$5.20	\$0.33	\$5.53
1/3/2012	20:58:53	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	5	\$3.00	\$0.19	\$3.19
1/5/2012	19:51:58	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
1/7/2012	20:06:17	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
1/9/2012	20:24:16	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	1	\$2.60	\$0.17	\$2.77
1/9/2012	20:28:36	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	8	\$3.30	\$0.21	\$3.51
1/12/2012	20:13:45	978	[REDACTED]	DANVERS	MA	978	[REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85

[REDACTED]

[REDACTED]

[REDACTED]



1/14/2012	19:35:23	978 [REDACTED]	DANVERS	MA	978 [REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
1/14/2012	20:05:51	978 [REDACTED]	DANVERS	MA	978 [REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
1/15/2012	15:09:21	978 [REDACTED]	DANVERS	MA	978 [REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
1/16/2012	20:04:01	978 [REDACTED]	DANVERS	MA	978 [REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
1/17/2012	19:25:20	978 [REDACTED]	DANVERS	MA	978 [REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
1/18/2012	20:12:53	978 [REDACTED]	DANVERS	MA	978 [REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
1/19/2012	18:39:24	978 [REDACTED]	DANVERS	MA	978 [REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
1/20/2012	20:09:34	978 [REDACTED]	DANVERS	MA	978 [REDACTED]	LAWRENCE	MA	30	\$5.50	\$0.35	\$5.85
Total										\$283.35	

As Ms. [REDACTED] has been made aware, Securus no longer issue credits for calls to cell phones. Our policy changed effective May 31, 2011, during the 14-month period when Ms. [REDACTED] was not receiving calls from a Securus correctional facility. The transmission quality of a call placed to a wireless device may be degraded, due to the nature of wireless networks. While Securus provides customers with the option to accept calls using a wireless device, customers are encouraged to use a landline in order to maintain the integrity of the call. As such, Securus is not responsible for the transmission quality of calls to wireless/cellular devices.

Therefore, use of cell phones is not recommended.

As additional information, to prevent premature call disconnections in the future, below is a list of things Ms. [REDACTED] can avoid while speaking with her loved one at Essex County Middleton Jail:

- Attempting 3-way calls
- Attempting to transfer a call or put the call on hold
- Using or answering call-waiting feature
- Use of a cellular phone
- Use of a cordless phone
- Attempting to press numbers on the phone keypad
- Pauses in the conversation
- Music before the call is answered on cell phones

For Ms. [REDACTED] records, the calls from the Essex County Middleton Jail and House of Corrections located in Middleton, MA to Lawrence, MA (Ms. [REDACTED] residence) are rated as follows:



SECURUS
TECHNOLOGIES

Essex County Middleton Jail and House of Corrections located in Middleton, MA	
Operator Service Charge:	\$2.50 (per call)
Usage Charge:	\$0.10 (per minute)

For a 30 minute call the charge would be \$5.50 plus applicable taxes and fees.

As a onetime courtesy, Ms. [REDACTED] will be issued a credit for the \$2.50 surcharge for each of the two calls which were terminated for third party calling. Ms. [REDACTED] currently has [REDACTED] in funds to receive collect calls from Essex County Middleton Jail and House of Corrections.

If there should be any further questions regarding this issue, Ms. [REDACTED] can reach us at 800-844-6591 or www.securustech.net.

Sincerely,

Kelly Elza

Kelly Elza
Escalations Specialist I

[REDACTED]

[REDACTED]

[REDACTED]



SECURUSTM
TECHNOLOGIES

June 20, 2012

Dear Mr. Stallings,

Securus Technologies, Inc., with its customer service department, Correctional Billing Services, (collectively, "Securus"), hereby responds to John [REDACTED] complaint regarding a refund request for an account set up to receive collect calls, however he never successfully received one. Securus is an inmate telephone service provider that handles inmate collect calls from confinement facilities.

According to Mr. [REDACTED] complaint, he indicates he funded an account to receive calls from a friend in jail. His friend was never able to complete a call to him due to a block on his line, however he did not find this out until after his friend had been released some time later. At this time, he would like this matter investigated and would like a refund of the \$25.00 he deposited into his account.

Investigation into this matter finds Prepaid account number [REDACTED] was established in the name of John [REDACTED] on October 19, 2010 for billed telephone number 413 [REDACTED]

It is Securus' policy that in the event an account has no activity for a period of six months (180 days), the account is automatically closed and the balance becomes \$0.00. Mr. [REDACTED] should note that this is stated in the Terms and Conditions that are disclosed via an automated Integrated Voice Response system ("IVR") when a consumer sets up their account, however consumers may choose to hang up or bypass the information. The information may also be found on our website at www.securustech.net.

Mr. [REDACTED] account was funded in the amount of \$25.00 on October 19, 2010. As Mr. [REDACTED] indicated he did not receive any calls on the account. Mr. [REDACTED] account was automatically closed and the balance of \$25.00 was deducted May 6, 2011. On May 28, 2012 Mr. [REDACTED] requested we place the funds back into the account.

Despite the six month (180-day) policy, Securus Correctional Billing Services will comply and issue Mr. [REDACTED] a check in the amount of \$25.00. It will be mailed to the address associated with his account, which matches the address on the complaint with the Better Business Bureau of Metropolitan Dallas:

[REDACTED]
North Adam, MA 01247

Please allow ten to twelve business days for the refund to process and the check to be mailed.

Securus sincerely regrets any inconvenience this may have caused Mr. [REDACTED] during his attempt to resolve this matter. If there should be any further questions regarding this issue, please contact us a 1-800-844-6591, via email at customerservice@securustech.net, or via chat at www.securustech.net.

Sincerely,

Kelly Elysa

[REDACTED]



SECURUS™
TECHNOLOGIES

Kelly Elza
Escalations Specialist

~~ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED EXCEPT WHERE SHOWN OTHERWISE.~~



July 6, 2012

Dear Mr. Stallings,

Securus Technologies, Inc., with its customer service department, Correctional Billing Services, (collectively, "Securus"), hereby responds to Sarah [REDACTED] complaint regarding charges for calls that do not connect involving collect calls accepted from the Billerica House of Corrections - Middlesex located in Billerica, MA, Middlesex County Cambridge Jail located in Cambridge, MA, and Hillsborough County Department of Corrections located in Manchester, NH.. Securus is an inmate telephone service provider that handles inmate collect calls from these confinement facilities.

According to Ms. [REDACTED] complaint, she indicates she has been charged for called that do not connect. At this time, she would like this matter investigated and would like a credit for the charges.

Investigation into this matter finds Prepaid account number [REDACTED] was established in the name of Sarah [REDACTED] on October 22, 2011 for billed telephone number 978 [REDACTED]

Research of Ms. [REDACTED] account from January 1, 2012 to present indicates she began receiving calls from the Hillsborough County Department of Corrections on March 30, 2012. A listing of her call records is below.

Call Date	Call Time	Orig. ANI	Orig. City	Orig. State	Term. ANI	Term. City	Term. State	Min.	Charge	Tax	Total
3/30/2012	17:59:06	603 [REDACTED]	MANCHESTER	NH	978 [REDACTED]	LEOMINSTER	MA	10	11.00	2.86	13.86
3/30/2012	19:36:28	603 [REDACTED]	MANCHESTER	NH	978 [REDACTED]	LEOMINSTER	MA	10	11.00	2.86	13.86
4/6/2012	18:04:02	603 [REDACTED]	MANCHESTER	NH	978 [REDACTED]	LEOMINSTER	MA	10	11.00	2.80	13.80
4/8/2012	17:54:48	603 [REDACTED]	MANCHESTER	NH	978 [REDACTED]	LEOMINSTER	MA	10	11.00	2.80	13.80
4/27/2012	18:08:13	603 [REDACTED]	MANCHESTER	NH	978 [REDACTED]	LEOMINSTER	MA	10	11.00	2.80	13.80
4/27/2012	18:19:27	603 [REDACTED]	MANCHESTER	NH	978 [REDACTED]	LEOMINSTER	MA	10	11.00	2.80	13.80
4/29/2012	19:12:03	603 [REDACTED]	MANCHESTER	NH	978 [REDACTED]	LEOMINSTER	MA	10	11.00	2.80	13.80
5/1/2012	18:22:43	603 [REDACTED]	MANCHESTER	NH	978 [REDACTED]	LEOMINSTER	MA	10	11.00	2.80	13.80
5/1/2012	19:24:15	603 [REDACTED]	MANCHESTER	NH	978 [REDACTED]	LEOMINSTER	MA	10	11.00	2.80	13.80
5/4/2012	19:02:58	603 [REDACTED]	MANCHESTER	NH	978 [REDACTED]	LEOMINSTER	MA	10	11.00	2.80	13.80
5/6/2012	18:14:59	603 [REDACTED]	MANCHESTER	NH	978 [REDACTED]	LEOMINSTER	MA	10	11.00	2.80	13.80
5/6/2012	19:43:53	603 [REDACTED]	MANCHESTER	NH	978 [REDACTED]	LEOMINSTER	MA	10	11.00	2.80	13.80
5/8/2012	18:52:09	603 [REDACTED]	MANCHESTER	NH	978 [REDACTED]	LEOMINSTER	MA	10	11.00	2.80	13.80
5/12/2012	18:39:10	603 [REDACTED]	MANCHESTER	NH	978 [REDACTED]	LEOMINSTER	MA	10	11.00	2.80	13.80
5/15/2012	18:00:15	603 [REDACTED]	MANCHESTER	NH	978 [REDACTED]	LEOMINSTER	MA	10	11.00	2.80	13.80
5/27/2012	19:00:41	603 [REDACTED]	MANCHESTER	NH	978 [REDACTED]	LEOMINSTER	MA	10	11.00	2.80	13.80
5/31/2012	18:23:08	61 [REDACTED]	CAMBRIDGE	MA	978 [REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/1/2012	20:10:46	61 [REDACTED]	CAMBRIDGE	MA	978 [REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/1/2012	22:35:21	61 [REDACTED]	CAMBRIDGE	MA	978 [REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20

[REDACTED]

[REDACTED]

6/2/2012	22:50:08	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.58	0.23	3.81
6/2/2012	23:06:58	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.58	0.23	3.81
6/3/2012	17:11:42	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.58	0.23	3.81
6/4/2012	10:42:12	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	4.50	0.29	4.79
6/4/2012	14:01:16	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	4.50	0.29	4.79
6/4/2012	20:05:49	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.95	0.25	4.20
6/4/2012	21:36:33	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.95	0.25	4.20
6/4/2012	21:53:09	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.95	0.25	4.20
6/4/2012	22:09:45	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.95	0.25	4.20
6/4/2012	23:20:25	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.58	0.23	3.81
6/5/2012	13:19:17	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	4.50	0.29	4.79
6/5/2012	13:35:48	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	4.50	0.29	4.79
6/5/2012	18:31:45	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.95	0.25	4.20
6/6/2012	16:53:36	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	4.50	0.29	4.79
6/6/2012	18:03:41	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.95	0.25	4.20
6/6/2012	21:55:03	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.95	0.25	4.20
6/6/2012	22:12:16	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.95	0.25	4.20
6/6/2012	23:16:21	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	1	3.08	0.20	3.28
6/6/2012	23:18:29	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	1	3.08	0.20	3.28
6/6/2012	23:27:41	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.58	0.23	3.81
6/7/2012	19:34:58	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.95	0.25	4.20
6/7/2012	19:51:28	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	1	3.10	0.20	3.30
6/7/2012	19:56:49	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.95	0.25	4.20
6/7/2012	21:55:09	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.95	0.25	4.20
6/7/2012	23:11:12	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.58	0.23	3.81
6/7/2012	23:27:41	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.58	0.23	3.81
6/8/2012	14:20:43	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	4.50	0.29	4.79
6/9/2012	15:26:20	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.58	0.23	3.81
6/9/2012	15:51:57	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.58	0.23	3.81
6/9/2012	18:14:06	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.58	0.23	3.81
6/9/2012	20:20:25	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.58	0.23	3.81
6/9/2012	21:49:29	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.58	0.23	3.81
6/9/2012	23:12:40	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.58	0.23	3.81
6/10/2012	13:32:46	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.58	0.23	3.81
6/10/2012	13:49:13	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.58	0.23	3.81
6/10/2012	21:03:52	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.58	0.23	3.81
6/10/2012	23:25:06	617	CAMBRIDGE	MA	978	LEOMINSTER	MA	15	3.58	0.23	3.81

6/11/2012	13:36:55	61	[REDACTED]	CAMBRIDGE	MA	97	[REDACTED]	LEOMINSTER	MA	15	4.50	0.29	4.79
6/11/2012	18:03:54	61	[REDACTED]	CAMBRIDGE	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/11/2012	18:23:38	61	[REDACTED]	CAMBRIDGE	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/11/2012	19:03:10	61	[REDACTED]	CAMBRIDGE	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/11/2012	21:36:21	61	[REDACTED]	CAMBRIDGE	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/11/2012	22:04:34	61	[REDACTED]	CAMBRIDGE	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/11/2012	23:20:37	61	[REDACTED]	CAMBRIDGE	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.58	0.23	3.81
6/14/2012	18:20:34	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/14/2012	18:41:23	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/16/2012	18:25:08	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.58	0.23	3.81
6/16/2012	18:47:08	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	13	3.51	0.22	3.73
6/17/2012	17:41:48	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.58	0.23	3.81
6/17/2012	19:25:13	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.58	0.23	3.81
6/17/2012	21:34:24	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	10	3.40	0.22	3.62
6/18/2012	18:27:10	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/19/2012	18:17:49	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/19/2012	20:17:14	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/20/2012	17:21:58	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/20/2012	21:22:04	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/21/2012	19:26:17	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/21/2012	20:39:02	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/23/2012	21:27:40	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.58	0.23	3.81
6/23/2012	22:07:15	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.58	0.23	3.81
6/24/2012	22:09:49	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.58	0.23	3.81
6/25/2012	20:38:56	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/25/2012	21:11:57	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/25/2012	21:28:56	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/25/2012	22:03:49	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/25/2012	22:21:16	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/26/2012	19:38:45	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/26/2012	20:37:23	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/27/2012	18:28:26	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/27/2012	18:53:06	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/27/2012	19:42:46	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/28/2012	20:57:53	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/28/2012	21:20:49	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/29/2012	21:21:58	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
6/30/2012	21:38:03	97	[REDACTED]	BILLERICA	MA	97	[REDACTED]	LEOMINSTER	MA	15	3.58	0.23	3.81



6/30/2012	22:06:41	978 [REDACTED]	BILLERICA	MA	978 [REDACTED]	LEOMINSTER	MA	15	3.58	0.23	3.81
6/30/2012	22:23:43	978 [REDACTED]	BILLERICA	MA	978 [REDACTED]	LEOMINSTER	MA	15	3.58	0.23	3.81
7/1/2012	21:07:08	978 [REDACTED]	BILLERICA	MA	978 [REDACTED]	LEOMINSTER	MA	15	3.58	0.23	3.81
7/1/2012	22:55:44	978 [REDACTED]	BILLERICA	MA	978 [REDACTED]	LEOMINSTER	MA	15	3.58	0.23	3.81
7/2/2012	18:41:17	978 [REDACTED]	BILLERICA	MA	978 [REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
7/2/2012	21:17:11	978 [REDACTED]	BILLERICA	MA	978 [REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
7/3/2012	18:14:53	978 [REDACTED]	BILLERICA	MA	978 [REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
7/3/2012	20:16:44	978 [REDACTED]	BILLERICA	MA	978 [REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
7/3/2012	21:46:25	978 [REDACTED]	BILLERICA	MA	978 [REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
7/4/2012	17:18:44	978 [REDACTED]	BILLERICA	MA	978 [REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
7/4/2012	17:35:29	978 [REDACTED]	BILLERICA	MA	978 [REDACTED]	LEOMINSTER	MA	2	3.16	0.10	3.36
7/4/2012	17:38:23	978 [REDACTED]	BILLERICA	MA	978 [REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
7/4/2012	19:16:30	978 [REDACTED]	BILLERICA	MA	978 [REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
7/4/2012	19:49:23	978 [REDACTED]	BILLERICA	MA	978 [REDACTED]	LEOMINSTER	MA	11	3.71	0.24	3.95
7/4/2012	21:17:06	978 [REDACTED]	BILLERICA	MA	978 [REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
7/5/2012	18:43:52	978 [REDACTED]	BILLERICA	MA	978 [REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
7/5/2012	21:47:17	978 [REDACTED]	BILLERICA	MA	978 [REDACTED]	LEOMINSTER	MA	15	3.95	0.25	4.20
Total											\$ 607.84

Ms [REDACTED] is receiving calls on her cell phone. As referenced in her complaint, she has been made aware of Securus' policy regarding credits to calls from cell phones. The transmission quality of a call placed to a wireless device may be degraded, due to the nature of wireless networks. While Securus provides customers with the option to accept calls using a wireless device, customers are encouraged to use a landline in order to maintain the integrity of the call. As such, Securus is not responsible for the transmission quality of calls to wireless/cellular devices.

Therefore, use of cell phones is not recommended.

As additional information for Ms [REDACTED] below is a list of common issues and features that could prevent call acceptance or could prematurely disconnect a call from her loved one:

- 3-way calls
- Call transfer or putting the call on hold
- Using or answering call-waiting feature
- Use of a cellular phone
- Use of a cordless phone
 - Please note that most cordless phones / cell phones change channels/satellites without notice so as to provide the best coverage. This can disrupt a call.
- Dialing of additional digits

[REDACTED]

[REDACTED]



- Silence / pauses in the conversation or putting the call on mute
- Speaker phones
- Excessive background noise and/or yelling into the receiver
- Cupping a hand over the phone when speaking
- Music before the call is answered on cell phones
- Customized or special call routing

As a onetime courtesy we are crediting Ms. [REDACTED] for the four (4) short calls highlighted above, in the amount of [REDACTED]

Securus sincerely regrets Ms. [REDACTED]'s frustration with disconnections regarding her calls. If she has any further questions or concerns, she may call us at 800-844-6591, via email at customerservice@securustech.net or via chat at www.securustech.net.

Sincerely,

Kelly Elza

Kelly Elza
Escalations Specialist

[REDACTED]



July 13, 2012

Dear Mr. Stallings,

Securus Technologies, Inc., with its customer service department, Correctional Billing Services, (collectively, "Securus"), hereby responds to Melissa [REDACTED] complaint regarding dropped calls. Securus is an inmate telephone service provider that handles inmate collect calls confinement facilities.

According to Ms. [REDACTED] complaint, she indicates she had dropped calls on her cell phone. At this time, she would like this matter investigated and would like credit for two dropped calls received June 19, 2012.

Investigation into this matter finds Securus cannot find an account associated with Melissa [REDACTED] at the address provided on her complaint. Further, Ms. [REDACTED] did not provide the telephone number in question to research the dropped calls.

Unfortunately at this time we are unable to research this matter further. If Ms. [REDACTED] can please provide additional information such as the telephone number in question we would be happy to investigate and resolve his issue.

Ms. [REDACTED] can contact us at 800-844-6591, via email at customerservice@securustech.net or via chat at www.securustech.net.

Sincerely,

Kelly Elza

Kelly Elza
Escalations Specialist



December 5, 2012

Dear Mr. Stallings,

Securus Technologies, Inc., with its customer service department, Correctional Billing Services, (collectively, "Securus"), hereby responds to Winifred [REDACTED] complaint regarding her inability to make a debit card payment involving collect calls accepted from the Barnstable County Corrections Facility located in Bourne, MA. Securus is an inmate telephone service provider that handles inmate collect calls from this confinement facility.

According to Ms. [REDACTED] complaint, she indicates she is not able to make a payment with her debit card for one month. At this time, she would like this matter investigated and would like to be able to use her debit card.

The name on the account associated with the telephone number 617 [REDACTED] is not "Winifred [REDACTED]". Thus there is limited information we can provide regarding Ms. [REDACTED] complaint.

In the Telecommunications Act of 1996, Section 222, Congress laid out specific requirements to protect "customer proprietary network information" or CPNI. CPNI includes such things as: a customer's payment history, balances due, services and functions on the telephone account, and details regarding customer calling patterns.

The FCC has provided rules to comply with the 1996 Act regarding who should have access to CPNI information and the limited purposes for which CPNI information may be released. Telecommunications carriers are restricted from providing customer information without the explicit consent of the account owner. FCC Rules §64.2007, provides that approval is required for the disclosure or access to customer proprietary network information. A telecommunications carrier may not disclose or allow access to CPNI without permission from the account holder.

Attempting to access customer account information to determine why a telephone account was blocked or not receiving calls, by anyone other than the account holder, would violate CPNI regulations. Only the account holder is authorized to access the specific information as to why the account is not receiving calls, unless the account holder provides explicit permission for another party to access that information.

Unfortunately since Ms. [REDACTED] is not the account holder, we cannot provide any further information. However please note, as with many retailers, when a credit card is declined, a reason for the decline is not always provided.

As information, please be advised that there is a \$6.95 service fee each time a payment is made via credit card. It is in a consumer's best interest to make payments in larger amounts so they can fund their accounts less



SECURUS™
TECHNOLOGIES

frequently. Also, a personal check, money order, or cashier's check may be mailed to fund an account free of charge. Checks may be mailed to:

Securus Correctional Billing Services
P.O. Box 650757
Dallas, TX 75265-0757

If a check is mailed, please be sure the telephone number and/or account number is notated on the check so the funds will be applied correctly.

If Ms. [REDACTED] is indeed the owner of telephone number 617-[REDACTED] we advise Ms. [REDACTED] to please send in a copy of her telephone bill listing her as the owner of the number, and we will update her account accordingly. She may fax it to 972-277-0714, or email it to customerservice@securustech.net.

Securus regrets Ms. [REDACTED] frustration. If Ms. [REDACTED] has further questions or concerns, she may contact us at 800-844-6591, via email at customerservice@securustech.net, or via chat at www.securustech.net.

Sincerely,

Kelly Elza

Kelly Elza

Escalations Specialist