

**Description and Justification
for
Securus Technologies, Inc.’s
Mandatory Data Collection Report**

A. General Notes.

1. General. This response to the Mandatory Data Collection requirement comports with the holding in *Global Tel*Link v. Federal Communications Commission*, 866 F.3d 397 (D.C. Cir. 2017) (the “GTL Decision”).
2. CCPS Data. Securus Technologies, Inc.’s (“Securus”) responses of “not applicable (n/a)” are based upon the holding of the GTL Decision regarding ancillary fee caps for interstate ICS only. GTL Decision, at 415.
3. Video Visitation Data. Securus’ response of “not applicable (n/a)” are based upon the holding of the GTL Decision regarding lines of business unrelated to ICS. GTL Decision, at 416-7.
4. 2018 Audited Financial Statements. Securus’ audited financial statements are not yet complete as of March 1, 2019. When complete, Securus will file an errata to this response with the 2018 audited financial statements.

B. Company Information.

1. Rate Of Return Used in Estimating ICS Costs. [REDACTED]
2. Affiliates. Securus has no Affiliates under the definition stated in the Commission’s Instructions available at <https://www.fcc.gov/general/ics-data-collections>.

C. Total ICS Data.

1. Total ICS Cost. Securus is reporting costs related to the provision of interstate and international ICS. For purposes of this report, costs are allocated by type of call based on the proportion of revenue for that call type.

In addition, the responses for this item are taken from Securus’ audited financial statements, and may vary from the aggregate of the reported facility-specific costs. Securus’ accounting systems track costs as a company, and not on a customer or facility level. The facility-specific costs are taken from a separate data base used to track profits and losses for each site. While that data is the best

available for the customer / facility-level tracking, there may be additional adjustments for purposes of company accounting.

2. Total ICS Revenues. Securus is reporting revenues derived from the provision of interstate and international ICS. In addition, the responses for this item are taken from Securus' audited financial statements and as reported to the Commission in Securus' 499A reports. Securus' accounting systems track revenues as a company, and not on a customer or facility level. The facility-specific revenues are taken from a separate data base used to track profits and losses for each site. While that data is the best available for the customer / facility-level tracking, there may be additional adjustments for purposes of company accounting.
3. Total ICS Direct Costs. Securus is reporting direct costs incurred from the provision of interstate and international ICS. Securus' accounting systems do not allocate costs based on type of call (i.e., interstate, intrastate, and international). For purposes of this report, costs treated as direct are allocated by type of call based on the proportion of each facility's revenue for that call type.
4. Total Direct Costs Related to Collect ICS Calls. Securus is reporting direct costs incurred from the provision of collect interstate and international ICS. Securus' accounting systems do not allocate costs based on type of call (i.e., interstate, intrastate, and international). For purposes of this report, costs treated as direct are allocated by type of call based on the proportion of each facility's revenue for that call type.
5. Total Revenues from Collect ICS Calls. Securus is reporting revenues derived from the provision of interstate and international ICS.
6. Total Site Commissions. Securus is reporting the total of site commissions paid by Securus from the provision of interstate and international ICS. For purposes of this report, variable commissions are allocated by type of call based on the proportion of each facility's revenue for that call type.

D. Facility-Level ICS Data.

1. Average Daily Population (ADP). In the ordinary course of business, Securus does not track ADP at the facility level. Securus only tracks ADP at the contract/customer level. The extent a customer has multiple facilities, Securus can only report the customer's ADP for each listed facility. Further, Securus does not keep historical ADP information, only has data collected from customers from time-to-time, and does not have ADP information retrievable on a year-by-year basis. The information presented for all years is the current data Securus has available.
2. Number of Calls. In each category, Securus is reporting the number of applicable interstate and international ICS calls.

3. Minutes of Use (MOU). In each category, Securus is reporting the applicable MOU related to interstate and international ICS calls.
4. Maximum Call Duration. Securus' systems tracks only the present maximum call duration for facilities, and does not retain historical durations retrievable on a year-by-year basis. As such this information is only available for the present call durations.
5. Paper Bill / Statement Fee Revenues (PBFs). Securus' response of "not applicable (n/a)" is based upon the holding of the GTL Decision regarding the authority of the FCC to impose caps on ancillary fees for interstate ICS only. GTL Decision, at 415.
6. Third Party Transaction Fees (TPTFs). Securus accounts (whether funded through third-party transfers and transactions, or funded directly through Securus) are not specific to any facility; an account may be used to fund ICS to multiple facilities. As a result, Securus does not assign Moneygram and Western Union transactions to specific facilities. [REDACTED]

[REDACTED]

[REDACTED]

Moneygram and Western Union are not Affiliates of Securus.

7. MOU Revenue. In each category, Securus is reporting the applicable MOU revenue generated by interstate and international ICS calls.
8. ICS Direct Costs. Securus is reporting direct costs incurred by Securus from the provision of interstate and international ICS. Securus' accounting systems neither

tracks costs by facility nor allocates costs based on type of call (i.e., interstate, intrastate, and international). For purposes of this report, costs are first allocated on a facility-basis based on the proportion of that facility's total ICS revenue compared to total Securus' ICS revenues, and then allocated by type of call based on the proportion of each facility's revenue for that call type.

9. Variable Site Commissions. Securus is reporting the total commissions paid by Securus from the provision of interstate and international ICS. For purposes of this report, variable commissions are allocated by type of call based on the proportion of each facility's revenue for that call type.
10. Total International ICS Costs. Securus' accounting systems neither tracks costs by facility nor allocates costs based on type of call (i.e., interstate, intrastate, and international). For purposes of this report, costs are first allocated on a facility-basis based on the proportion of that facility's total ICS revenue compared to total Securus' ICS revenues, and then allocated by type of call based on the proportion of each facility's revenue for that call type.