



# Human Rights Defense Center

DEDICATED TO PROTECTING HUMAN RIGHTS

**Submitted Online Only**

June 24, 2016

The Honorable Tom Wheeler, Chairman  
Federal Communications Commission  
445 12<sup>th</sup> St. S.W.  
Washington, DC 20554

**Re: *Ex Parte* Submission re: Price Gouging of Prisoners' Families  
Following June 20, 2016 Implementation of ICS Jail Reforms,  
WC Docket 12-375**

Dear Chairman Wheeler:

The Human Rights Defense Center (HRDC) respectfully submits this *ex parte* filing to notify the Federal Communications Commission (FCC or the Commission) of predatory practices of at least one Inmate Calling Services (ICS) provider with respect to intrastate rates and ancillary fees, following implementation of the FCC's reforms related to phone calls from jails.

The Oklahoma Department of Corrections contracts with Corrections Corporation of America to run the Davis Correctional Facility (CCA Davis) in Holdenville, OK.<sup>1</sup> Securus Technologies is the ICS provider for CCA Davis. (**Attachment 1 ¶2**). Linda Abitbol has a loved one incarcerated by the State of Oklahoma at CCA Davis, and she notified HRDC on March 18, 2016 that Securus was continuing to charge a transaction fee of \$7.95 for deposits made to her prepaid AdvanceConnect account. *Id. at* ¶3. CCA Davis houses prisoners solely for the Oklahoma DOC (**Attachment 2**) and while this appears to be contrary to the FCC's *Order*,<sup>2</sup> Ms. Abitbol reports that she was required to continue paying \$7.95 to deposit funds to her prepaid account until June 20, 2016. (**Attachment 1 ¶4**).

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<sup>1</sup> <http://www.cca.com/facilities/davis-correctional-facility>

<sup>2</sup> *Interstate Inmate Calling Services*, Second Report and Order and Third Further Notice of Proposed Rulemaking, 30 FCC Rcd 12763 (2015)

Ms. Abitbol further reports that while the transaction fee she is required to pay to Securus to deposit funds into her prepaid account was reduced to \$3.00 on June 20, 2016, Securus also reduced the maximum transaction amount to \$50.00 (from \$250.00), effectively eliminating any meaningful reduction in fees. *Id. at ¶5*. Securus also created a rate of \$3.60 for the first minute of intrastate calls from CCA Davis and charges \$0.11 for additional minutes. (**Attachment 3**). The cost of a 15-minute intrastate call from CCA Davis went up \$1.71 on June 20, 2016. (**Attachment 1 ¶6**).

HRDC received additional complaints involving the practices of Securus Technologies with respect to intrastate calling rates on June 21, 2016:

- EJ Johnson reported that she used to be able to deposit \$100-\$200 into her Securus prepaid account with a \$7.95 transaction fee, but the deposit amount has since been lowered to \$50. (**Attachment 4, Page 1**). Mrs. Johnson also provided us with a copy of a recent Call Summary demonstrating that the cost of a 15-minute intrastate call from Holdenville, OK went from \$4.03 on June 19, 2016 to \$5.75 on June 20, 2016, representing a **43% increase (\$1.72) in the cost of a call. (Attachment 5)**.
- Randy James let us know that Securus is informing consumers who are forced to use their ICS services through live chat that:

“Due to an order by the FCC, effective June 20<sup>th</sup> certain fees related to inmate calling will be reduced or eliminated. As a result, you may see modifications and rebalancing of calling rates at that time **to offset fees that have been eliminated or reduced.**”

*Emphasis added. (Attachment 6).*

- L. Hayes reported that the same message is being disseminated to other customers through Voice Mail to Text (**Attachment 7**), and further reported that the cost of a 15-minute intrastate call from the Weld County Jail in Greeley, CO increased from \$3.75 on June 19, 2016 to \$5.71 on June 20, 2016, representing a **52% increase (\$1.96) in the cost of a call. (Attachment 8)**.

Clearly, Securus has done nothing more than “re-balance” ancillary fees that have been either reduced or eliminated by the Commission by increasing its pricing structure for ICS calls, with the net result of higher costs to prisoners’ family members.

HRDC is calling on the Commission to take action to address these unethical practices. While Securus may not be violating the law as long as the stays on intrastate rate caps issued by the U.S. Court of Appeals for the District of Columbia Circuit remain in effect, there is no question that they are not only violating the spirit of the Commission’s *Order*, but doing so in a blatant manner that indicates their contempt for the FCC’s reforms and authority.

Once again HRDC urges the FCC to take action to ban ALL ancillary fees. As long as they exist the ICS industry will continue conniving to exploit prisoners and families. Decisive action is required to end these abusive practices. The Commission will note that as recently as a decade ago ancillary fees did not even exist. They were created from whole cloth to boost the bottom lines of the hedge fund-owned ICS providers that exist only to exploit prisoners and their families.

We also urge the FCC to order all ICS providers to provide copies of their contracts, the kickbacks they pay to obtain those monopoly contracts and all other remunerations they give government entities for such contracts, as well as the phone rates and all fees they charge consumers for ICS services, and make them publicly available on their websites within 30 days of signing each contract.

Thank you for your time and attention to this matter.

Respectfully submitted,



Paul Wright  
Executive Director, HRDC

Attachments

# **Attachment 1**

June 23, 2016

The Honorable Tom Wheeler, Chairman  
Federal Communications Commission  
445 12<sup>th</sup> St. S.W.  
Washington, DC 20554

Dear Chairman Wheeler:

1. My name is Linda Abitbol and I receive phone calls from a loved one in the custody of the Oklahoma Department of Corrections who is physically incarcerated at the Davis Correctional Facility in Holdenville, OK which is run by Corrections Corporation of America (CCA Davis).
2. Securus Technologies provides the inmate telephone service at CCA Davis and I deposit funds into my prepaid AdvanceConnect account at the Securus website.
3. I contacted the Human Rights Defense Center on March 18, 2016 because the prison phone rates and fees did not change at CCA Davis on March 17, 2016 like I thought they were supposed to because of your new regulations, because the prisoners are under the custody of the Oklahoma Department of Corrections.
4. Securus continued to charge me \$7.95 to deposit funds to my AdvanceConnect account until June 20, 2016. Copies of a transaction I made on the Securus website on March 18, 2016 and of an entry to my bank account for a \$30.00 deposit to My AdvanceConnect account I made on April 12, 2016 (totaling \$37.95 after the fee) are attached.
5. While it is true that Securus lowered the transaction fee to \$3.00 for deposits to my AdvanceConnect account on June 20, 2016, they also lowered the maximum deposit I can make to \$50.00, which is making me have to pay more than one transaction fee to deposit the same amount of money I used to.
6. Also, the intrastate rates went up for calls from CCA Davis on June 20, 2016. There is a new \$3.60 charge for the first minute of our calls (\$3.71 after 5 p.m.) and then \$0.11/min for each additional minute which has increased the amount of a 15 minute call by \$1.71. A copy of the transcript of a "chat" I had with a Securus representative on June 22, 2016 is also attached.

I cannot believe that the result of the FCC's *order* was to make families pay even more than we had to pay before and would appreciate anything you can do to resolve this horrible situation.

Thank you.

*/s/ Linda Abitbol*

Linda Abitbol  
2734 S 120 E Ave.  
Tulsa, OK 74129



[Securus Home](#)



## Add Funds to AdvanceConnect

- **Account Number:** Redacted
- **Phone #:** (918) Redacted
- **Balance:** \$6.48

## Billing Address

Your billing address must match your credit card. To avoid failed payments, please update the billing address to match the credit card.

First Name:

LINDA

Last Name:

ABITBOL

Address:

2734 S120 E AVE

City/State/Zip Code:

TULSA

[ \ ]

74129

## Payment Details

[ ] [Update My Credit Card Information](#)



Credit Card Type:

[ \ ]

Credit Card Number:

Redacted

Expiration Date:  
Redacted

CVV2 Code:  
\*\*\* What's this?

Save Credit Card

## Deposit Amount

Amount to Deposit:  
0.00

**( Min: \$ 0.01 Max: \$ 250.00 )**

**Transaction Fees: \$7.95**

**Total Charges: \$0.00**

## Automatic Payment Options

**AutoPay**

Ensure you never miss a call with AutoPay, sign up today!

AutoPay automatically funds your AdvanceConnect account with a preset amount of your choice whenever your account reaches a balance of **\$10.00**.

**TextPay**

Ensure you are always connected with TextPay, sign up today!

TextPay will send you a text message when your account balance reaches **\$10.00**. You can simply reply to the text to immediately fund with your preset amount. If you don't reply no funding will take place.

**None**

[CANCEL](#) [submit]



Pending POS 103669299289-SECURUS CORR BILL SR \$37.95

see this is how it comes out on bank statement - but it doesn't break it down ?

June 21, 2016

 Lagreisha: Thank you for contacting Securus Correctional Billing Services. My name is Lagreisha. How may I help you?

 linda abitbol: linda abitbol 918-Redacted pin # Reda

 linda abitbol: i notice the processing fees/add funds fees have dropped to \$3 thats great

 linda abitbol: however how do we tell what our phone rates are now

 linda abitbol: can u tell me

 Lagreisha: I will be happy to provide the rates for the facility. May I have the name of the facility ?

 linda abitbol: davis correctional facility - in holdenville, ok

 Lagreisha: Thank you, please allow me 2-3 minutes to review the account.

 linda abitbol: ok

 **Lagreisha: Thank you for holding. I was able to review the account and I am seeing that for the first minute is \$3.60 from 8:00AM-4:00PM and then \$0.11 per minute plus tax after the first minute. Then from 5:00PM-11:00PM the first minute is \$3.71 for the first minute and then \$0.11 per minute plus tax after the first minute.**

# **Attachment 2**

**From:** Yandell, Bryan [mailto:Bryan.Yandell@cca.com]  
**Sent:** Friday, June 24, 2016 9:30 AM  
**To:** Carrie Wilkinson  
**Subject:** RE: Media Inquiry: Prison Legal News

All of the Offenders here at Davis are under the custody of Oklahoma Department of Corrections (DOC).

**From:** Carrie Wilkinson [mailto:cwilkinson@humanrightsdefensecenter.org]  
**Sent:** Friday, June 24, 2016 11:26 AM  
**To:** Yandell, Bryan <Bryan.Yandell@cca.com>  
**Subject:** Media Inquiry: Prison Legal News

**\*\*\* This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\***

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Good Morning,

I am with the Human Rights Defense Center, publisher of *Prison Legal News*. Can you please tell me if all the prisoners at CCA Davis in Holdenville, OK are under the custody of the Oklahoma DOC, or does CCA hold prisoners at CCA Davis for other agencies as well?

Thank you.

Carrie Wilkinson  
*Prison Phone Justice Director*  
**Human Rights Defense Center**  
801 Second Ave., Suite 800  
Seattle, WA 98104  
Office: 206.489.5604  
Cell: 206.604.6145  
[www.humanrightsdefensecenter.org](http://www.humanrightsdefensecenter.org)

[See how CCA is making a difference](#)

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(i) This e-mail and any files transmitted with it are confidential and intended solely for the use of the intended recipient(s). If you have received this e-mail in error, please notify the sender immediately and delete this e-mail and any associated files from your system. (ii) Views or opinions presented in this e-mail are solely those of the author and do not necessarily represent those of Corrections Corporation of America. (iii) The recipient should check this e-mail and any attachments for the presence of viruses. The company accepts no liability for errors or omissions caused by e-mail transmission or any damage caused by any virus transmitted by or with this e-mail. This email has been scanned for content and viruses by the McAfee Email Security System.

# **Attachment 3**



(<https://securustech.net/call-rate-calculator?>)

p\_p\_auth=yNIAMmw5&p\_p\_id=49&p\_p\_lifecycle=1&p\_p\_state=normal&p\_p\_mode=view&\_49\_struts\_action=%2Fmy\_sites%2Fview&\_49\_groupId=104052&\_49\_privateLayout=false

**Email Address**  **Password**

**Log in to Securus Online:**  Remember Me

**Log In | Enroll Now**  
 (<https://securustech.net/web/securus/enroll>) **Correctional Staff**  
**Forgot Username or Password?**  
 (<https://securustech.net/web/securus/forget-password>)

[Live Chat \(https://securustech.net/web/securus/live-chat\)](https://securustech.net/web/securus/live-chat)

Home (<https://securustech.net/home1>) | Phone Services | Video Services | Jail Voicemail (<https://securustech.net/jail-voicemail>) | FCC (<https://securustech.net/fcc>) | Email Services | Facilities We Serve (<https://securustech.net/facilities-we-serve>) | Customer Care | What is Securus Online? (<https://securustech.net/web/securus/securus-online-overview>)

## Rate Quote

Use Securus' Rate Quote to quickly and easily find out the cost of a call or another Securus service.

First, be sure that Securus services the correctional facility you would like to communicate with by checking our [Facilities We Serve \(/facilities-we-serve\)](#) page.

Please select a service below, complete the required information, and click submit.

Choose a Service:

Your Country:

Your Phone Number:

Facility State:

Facility Name:

**Facility: DAVIS CCA**

### Breakdown of Call Rate per Minute

Time	Day (08:00-16:59)	Evening (17:00-23:00)	Night (23:01-07:59)
<b>Connection Charge</b>	\$ 0.00	\$ 0.00	\$ 0.00
<b>Initial Amount</b>	\$ 3.60	\$ 3.71	\$ 3.71
<b>Additional Amount</b>	\$ 0.11	\$ 0.11	\$ 0.11

Rate periods are based upon the time of the day a call is accepted.

International Calling may not be permitted at all Securus serviced Correctional Facilities.

Please note that facilities may have a connection charge per call, an initial rate for the first minute of call, and then a different rate for each minute after the first minute of a call. Rates are subject to change.

This rate quote is valid at Wed Jun 22 2016 12:59:07 GMT-0700 (Pacific Daylight Time).

In addition to the quoted rate of the call, applicable taxes and fees may apply. Please refer to our [Terms and Conditions \(/web/securus/terms-and-conditions\)](#).

# **Attachment 4**

**From:** [EJ Johnson](#)  
**To:** [Carrie Wilkinson](#)  
**Subject:** Re:  
**Date:** Tuesday, June 21, 2016 6:22:00 PM

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I just looked at my account and our bill for each phone call WAS \$4.03 with tax every 15 minutes to \$5.75 every call now!!!! I am livid!!! So much for helping us... all it did was hurt us more! I just don't know what to say.

Disgusted,  
Erica Johnson

On Tue, Jun 21, 2016 at 8:10 PM, EJ Johnson <[jaracris1970@gmail.com](mailto:jaracris1970@gmail.com)> wrote:

What new surcharge is Securus trying to push on us now? At one time before there was a bill trying to pass to help the inmates families with phone bills, you are able to put 100 or even \$200 at a time on the Securus account with one charge \$7.95 if you do it on the computer and it was \$9.95 if you did it on your phone. Now, since people are having a fit about High phone bill, Securus has limited our phone bills 2 \$50 a lot. That means every \$50 they are charging us that surcharge to put that amount of money on the wall in order to speak to her husband so they are already making more money off of us. So I just received a Facebook message saying that now they are charging us another dollar for the beginning of every 15 minute phone call? That is outrageous! I don't understand. What happened to the bill supposedly being passed? Upsettingly , Erica Johnson

# **Attachment 5**

## • Call Summary

*The time displayed is the Facility Local Time*

Date	Time	Facility City	Facility State	Phone#	Call Duration (Min)	Billed	Cost
06/21/2016	10:07:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$5.75
06/21/2016	8:39:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$5.75
06/21/2016	6:28:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$5.75
06/20/2016	5:19:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$5.75
06/20/2016	5:03:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$5.75
06/20/2016	9:08:00 AM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$5.75
06/19/2016	10:31:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/19/2016	5:07:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/19/2016	12:49:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/19/2016	9:56:00 AM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/18/2016	10:36:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/18/2016	8:59:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/18/2016	5:11:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/18/2016	2:00:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/17/2016	10:33:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/17/2016	8:51:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/17/2016	6:35:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/17/2016	1:22:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/17/2016	1:06:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/16/2016	10:35:00 PM	HOLDENVILLE	OK	(405) 303-5054	15	N	\$4.03
06/16/2016	10:19:00 PM	HOLDENVILLE	OK	(405) 303-5054	15	N	\$4.03
06/16/2016	9:10:00 PM	HOLDENVILLE	OK	(405) 303-5054	15	N	\$4.03
06/15/2016	10:29:00 PM	HOLDENVILLE	OK	(405) 303-5054	15	N	\$4.03
06/15/2016	6:25:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/15/2016	2:02:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/15/2016	9:35:00 AM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/13/2016	4:21:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/13/2016	12:23:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/13/2016	12:07:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/13/2016	10:56:00 AM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/13/2016	9:34:00 AM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/12/2016	9:36:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/12/2016	9:19:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/12/2016	9:03:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/12/2016	5:36:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/12/2016	5:04:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/12/2016	11:05:00 AM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/11/2016	9:32:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03

06/11/2016	5:07:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/11/2016	12:36:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/11/2016	9:19:00 AM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/10/2016	9:33:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/10/2016	8:07:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/10/2016	5:20:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/10/2016	12:21:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/10/2016	12:05:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/10/2016	9:15:00 AM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/10/2016	8:59:00 AM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/09/2016	9:36:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03
06/09/2016	9:20:00 PM	HOLDENVILLE	OK	(405) 303-0690	15	N	\$4.03

This is the last 50 calls... as you can see they went up instead of down! They changed the surcharge for putting money on the wall from \$7.95 to \$3.00 each time to deposit funds, however, Securus also capped how much money you are able to put on the account at a time so they are making a profit in that area as well.

( Min: \$ 0.01 Max: \$ 50.00 )

Transaction Fees: \$ 3.00

Total Charges: \$0.00

## ***State to State Rates Remain in Effect***

FCC State to State Calling Rates (\$0.25 and \$0.21 per minute rates) remain in effect

Randy James Fwd Phone call increase Incident 160620-007342  
From: Randy James <randy1427@aol.com>  
Sent: Tuesday, June 21, 2016 7:49 AM  
To: Carrie Wilkinson  
Subject: Fwd: Phone call increase [Incident: 160620-007342]

Sent from my iPhone

Begin forwarded message:  
From: "Securus Support" <securus1@mailmw.custhelp.com>  
Date: June 20, 2016 at 11:48:24 PM CDT  
To: randy1427@aol.com  
Subject: Phone call increase [Incident: 160620-007342]  
Reply-To: "Securus Support" <securus1@mailmw.custhelp.com>

Recently you requested personal assistance from our on-line support center. Below is a summary of your request and our response.

If this issue is not resolved to your satisfaction, you may reopen it within the next 7 days.

Thank you for allowing us to be of service to you.  
To access your question from our support site, click here.

Subject  
Phone call increase

Discussion Thread  
Response Via Email (Dionne)  
06/20/2016 11:48 PM  
Thank you for contacting Securus Correctional Billing Services.

Thank you for your account inquiry. I am sorry for the inconvenience. Due to an order by the FCC, effective June 20th certain fees related to inmate calling will be reduced or eliminated. As a result, you may see modifications and re balancing of calling rates at that time to offset fees that have been eliminated or reduced.

Keep in mind you can log in to manage your account online at [www.securustech.net](http://www.securustech.net). You will be able to make payments, check on your account status, view your charges and payments made to the account and also sign up for auto pay, text pay and text notifications. Thank you,

Securus Correctional Billing Services  
For Frequently Asked Questions please visit us online at [www.SecurusTech.net](http://www.SecurusTech.net)

Take back control with Securus Online! Enroll today by visiting [www.securustech.net](http://www.securustech.net) from your mobile phone or personal computer.

Auto-Response  
06/20/2016 05:52 PM  
The following answers might help you immediately. (Answers open in a separate window.)

Answer Link: What is Text2Connect™  
Answer Link: Fee- AdvanceConnect Account and Associated Fees  
Answer Link: SecureView Tablet FAQ's

Randy James Fwd Phone call increase Incident 160620-007342

Answer Link: Cell Phones for Alaska DOC

Answer Link: Your Account May have Several Telephone Numbers

Customer By Web Form (RANDY JAMES)

06/20/2016 05:52 PM

why did phone calls go from \$5.66 to \$8.10 when the FCC and the MDOC commissioner said

they would be half the cost of what they were ? My son is in a MS State run fac.

Question Reference #160620-007342

Product Level 1:

Advanced Connect

Category Level 1:

Existing Account Inquiry

Date Created:

06/20/2016 05:52 PM

Last Updated:

06/20/2016 11:48 PM

Status:

Closed

Phone Number:

601-506-0890

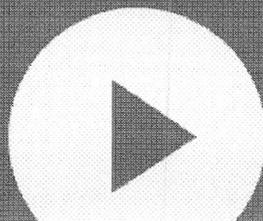
[---001:001791:47637---]

# **Attachment 7**

Certain fees related to inmate calling will be reduced eliminated. As a result consumers of make calls Macy modifications and rebalancing of calling rates at that time to offset fees and a been eliminated or reduced. To accept charges press one. To refuse charges press two. If you would like to permanently block your number from receiving calls from this facility press six. For balance and rate quotes press seven. To accept charges press one. To refuse charges press

00:00

00:41



# **Attachment 8**

06/20/2016	11:46:00 AM	GREELEY	CO	(970) 381-3113	12	N	\$5.28
06/20/2016	8:36:00 AM	GREELEY	CO	(970) 381-3113	15	N	\$5.71
06/19/2016	10:50:00 PM	GREELEY	CO	(970) 381-3113	15	N	\$3.75
06/19/2016	4:51:00 PM	GREELEY	CO	(970) 381-3113	15	N	\$3.75
06/19/2016	12:41:00 PM	GREELEY	CO	(970) 381-3113	15	N	\$3.75
06/19/2016	12:18:00 PM	GREELEY	CO	(970) 381-3113	15	N	\$3.75
06/18/2016	11:07:00 PM	GREELEY	CO	(970) 381-3113	13	N	\$3.75
06/18/2016	9:32:00 PM	GREELEY	CO	(970) 381-3113	15	N	\$3.75
06/18/2016	5:04:00 PM	GREELEY	CO	(970) 381-3113	15	N	\$3.75
06/18/2016	12:12:00 PM	GREELEY	CO	(970) 381-3113	15	N	\$3.75
06/18/2016	8:57:00 AM	GREELEY	CO	(970) 381-3113	15	N	\$3.75
06/17/2016	7:45:00 PM	GREELEY	CO	(970) 381-3113	15	N	\$3.75
06/17/2016	6:03:00 PM	GREELEY	CO	(970) 381-3113	15	N	\$3.75
06/17/2016	3:55:00 PM	GREELEY	CO	(970) 381-3113	15	N	\$3.75
06/17/2016	10:55:00 AM	GREELEY	CO	(970) 381-3113	15	N	\$3.75
06/17/2016	8:41:00 AM	GREELEY	CO	(970) 381-3113	15	N	\$3.75
06/16/2016	11:13:00 PM	GREELEY	CO	(970) 381-3113	12	N	\$3.75
06/16/2016	9:59:00 PM	GREELEY	CO	(970) 381-3113	15	N	\$3.75
06/16/2016	6:04:00 PM	GREELEY	CO	(970) 381-3113	15	N	\$3.75