

ICS Regulatory Reform Proposal Comparison Submitted by Pay Tel Communications, Inc.

Item	Ethical Proposal for Reform of ICS Rates & Fees	Global Tel*Link, Securus, Telmate Proposal																								
Rate Structure	<ul style="list-style-type: none"> • Applicable to Interstate & Intrastate Calls • Per-Minute-of-Use Rates Applicable to All Calls 	<ul style="list-style-type: none"> • Applicable to Interstate and Intrastate Calls • Per-Minute-of-Use Rates Applicable to All Calls • Option to Continue Charging a Flat Rate Per Call 																								
Rate Caps for Calls from Prisons	<ul style="list-style-type: none"> • Prison Rate applies to all State and Federal Prisons. <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>ADP</th> <th>RATE PER MINUTE</th> </tr> </thead> <tbody> <tr> <td>ALL</td> <td>\$0.08</td> </tr> </tbody> </table> <ul style="list-style-type: none"> • Prison Rate also applies to any Prison inmates housed at any Jail or Private facility that houses 40% or more Prison inmates. 	ADP	RATE PER MINUTE	ALL	\$0.08	<ul style="list-style-type: none"> • Prison Rate applies to all State and Federal Prisons. <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>ADP</th> <th>RATE PER MINUTE</th> </tr> </thead> <tbody> <tr> <td>ALL</td> <td>\$0.20</td> </tr> </tbody> </table> <ul style="list-style-type: none"> • Same rate for Prisons and Jails. 	ADP	RATE PER MINUTE	ALL	\$0.20																
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Facility Cost Recovery	<ul style="list-style-type: none"> • Prison Cost Recovery Fee Per Minute: To Be Determined • Cost Support Data to be supplied by Prison Agencies and/or ACA. • The FCC will work with Prison industry stakeholders to determine a fair cost recovery fee for Prisons to be added to each minute of use for all calls. 	<ul style="list-style-type: none"> • Prison Cost Recovery Fee Per Minute: \$0.005 (Cost Study provided by Global Tel*Link) 																								
Effective Date	<ul style="list-style-type: none"> • Existing contract rates and commissions are grandfathered for a minimum of: 18 months from the Order's publication date • Only upon implementation of Rate and Fee Caps and Facility Cost Recovery will existing commission arrangements be phased out. 	<ul style="list-style-type: none"> • Rate caps and elimination of commissions go into effect in: 90 days from the Order's "adoption" date 																								
Rate Caps for Calls from Jails	<ul style="list-style-type: none"> • Jail Rate applies to all City, County and Regional Jails and Detention Facilities. <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>ADP</th> <th>RATE PER MINUTE</th> </tr> </thead> <tbody> <tr> <td>1-349</td> <td>\$0.26</td> </tr> <tr> <td>350+</td> <td>\$0.22</td> </tr> </tbody> </table>	ADP	RATE PER MINUTE	1-349	\$0.26	350+	\$0.22	<ul style="list-style-type: none"> • Jail Rate applies to all City, County and Regional Jails and Detention Facilities. <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>ADP</th> <th>RATE PER MINUTE</th> </tr> </thead> <tbody> <tr> <td>ALL</td> <td>\$0.20</td> </tr> </tbody> </table> <ul style="list-style-type: none"> • Same rate for Prisons and Jails. 	ADP	RATE PER MINUTE	ALL	\$0.20														
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Transaction or Payment Processing Fee Caps	<ul style="list-style-type: none"> • Fees to make a payment to Direct Billed Collect Accounts, Debit Accounts and Prepaid Accounts shall not exceed the following: <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Description</th> <th>Fee Cap</th> </tr> </thead> <tbody> <tr> <td>Mail Check or Money Order</td> <td>No Fee</td> </tr> <tr> <td>Automated Phone Payment</td> <td>\$3.00</td> </tr> <tr> <td>Website Payment</td> <td>\$3.00</td> </tr> <tr> <td>Live Agent Phone Payment</td> <td>\$5.95</td> </tr> <tr> <td>Fund Transfer for Inmate Debit Calls</td> <td>5% of transfer amount</td> </tr> </tbody> </table> <ul style="list-style-type: none"> • Proposed Fee regulations go into effect: 90 days from the Order's publication date 	Description	Fee Cap	Mail Check or Money Order	No Fee	Automated Phone Payment	\$3.00	Website Payment	\$3.00	Live Agent Phone Payment	\$5.95	Fund Transfer for Inmate Debit Calls	5% of transfer amount	<ul style="list-style-type: none"> • Transaction or Deposit Fees to fund prepaid ICS accounts and debit ICS accounts would be subject to the following caps for three years: <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Description</th> <th>Fee Cap</th> </tr> </thead> <tbody> <tr> <td>Mail Check or Money Order</td> <td>No Fee</td> </tr> <tr> <td>Automated Phone Payment</td> <td>\$7.95</td> </tr> <tr> <td>Website Payment</td> <td>\$7.95</td> </tr> <tr> <td>Live Agent Phone Payment</td> <td>\$7.95</td> </tr> <tr> <td>Fund Transfer for Inmate Debit Calls</td> <td>Not Provided</td> </tr> </tbody> </table> <ul style="list-style-type: none"> • Proposed Fee regulations go into effect: 90 days from the Order's "adoption" date 	Description	Fee Cap	Mail Check or Money Order	No Fee	Automated Phone Payment	\$7.95	Website Payment	\$7.95	Live Agent Phone Payment	\$7.95	Fund Transfer for Inmate Debit Calls	Not Provided
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Money Transfer Fee	<ul style="list-style-type: none"> Proposes the following for Western Union® and MoneyGram® transactions: <table border="1" data-bbox="370 384 889 485"> <thead> <tr> <th>Description</th> <th>Current Fee</th> </tr> </thead> <tbody> <tr> <td>Western Union®</td> <td>\$5.95†</td> </tr> <tr> <td>MoneyGram®</td> <td>\$5.65†</td> </tr> </tbody> </table> <p style="text-align: center;">† Fees charged by third parties are subject to change at third party's discretion</p> Will require third parties charge the lowest fees available with no revenue share to ICS Vendor. Does not permit an Additional Administrative Fee <table border="1" data-bbox="370 638 889 705"> <thead> <tr> <th>Description</th> <th>Fee</th> </tr> </thead> <tbody> <tr> <td>Additional Administrative Fee</td> <td>Prohibited</td> </tr> </tbody> </table> Proposed Fee regulations go into effect: 90 days from the Order's publication date 	Description	Current Fee	Western Union®	\$5.95†	MoneyGram®	\$5.65†	Description	Fee	Additional Administrative Fee	Prohibited	<ul style="list-style-type: none"> Permits the following for Western Union® and MoneyGram® transactions <table border="1" data-bbox="954 384 1500 485"> <thead> <tr> <th>Description</th> <th>Current Fee</th> </tr> </thead> <tbody> <tr> <td>Western Union®</td> <td>\$10.95-\$11.95</td> </tr> <tr> <td>MoneyGram®</td> <td>\$10.99</td> </tr> </tbody> </table> Proposes an Additional Administrative Fee: <table border="1" data-bbox="954 638 1500 705"> <thead> <tr> <th>Description</th> <th>Fee Cap</th> </tr> </thead> <tbody> <tr> <td>Additional Administrative Fee</td> <td>\$2.50</td> </tr> </tbody> </table> Proposed Fee regulations go into effect: 90 days from the Order's "adoption" date 	Description	Current Fee	Western Union®	\$10.95-\$11.95	MoneyGram®	\$10.99	Description	Fee Cap	Additional Administrative Fee	\$2.50	
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Rate and Fee Cap for Premium Calling Options	<ul style="list-style-type: none"> Allowed ONLY in Jails. Includes single calls billed to cell phone or credit card. Flat Rate per Call: <table border="1" data-bbox="347 911 915 1041"> <thead> <tr> <th>ADP</th> <th>RATE PER CALL</th> <th>MAX. DURATION</th> <th>PAYMENT FEE</th> <th>TOTAL CHARGE</th> </tr> </thead> <tbody> <tr> <td>1-349</td> <td>\$3.12</td> <td>12 min.</td> <td>\$3.00</td> <td>\$6.12</td> </tr> <tr> <td>350+</td> <td>\$2.64</td> <td>12 min.</td> <td>\$3.00</td> <td>\$5.64</td> </tr> </tbody> </table> Flat rate based on proposed rate cap for 12-min. call plus a \$3.00 automated phone payment fee. This option is prohibited in Prisons due to the use of pre-approved call lists. 	ADP	RATE PER CALL	MAX. DURATION	PAYMENT FEE	TOTAL CHARGE	1-349	\$3.12	12 min.	\$3.00	\$6.12	350+	\$2.64	12 min.	\$3.00	\$5.64	<ul style="list-style-type: none"> Allowed in Prisons and Jails. Includes single calls billed to cell phone or credit card. Proposed: Vendors to charge current fees for these premium services for period of three years. Typical current Rate and Fees: <table border="1" data-bbox="964 978 1490 1079"> <thead> <tr> <th>CALL TYPE</th> <th>RATE PER CALL</th> </tr> </thead> <tbody> <tr> <td>Single Call Billed to Card</td> <td>\$14.99</td> </tr> <tr> <td>Single Call Billed to Cell Phone</td> <td>\$9.99</td> </tr> </tbody> </table> Max. Call Duration: NOT SPECIFIED 	CALL TYPE	RATE PER CALL	Single Call Billed to Card	\$14.99	Single Call Billed to Cell Phone	\$9.99
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Ancillary Fees	<ul style="list-style-type: none"> Permits Voice Biometric Fee applied ONLY at facilities that have deployed this feature: \$0.02 per minute All other recurring fees are prohibited. All other non-recurring fees are prohibited. Vendors may file for a new technology fee by providing justification and cost study; must be submitted with annual reporting. 	<ul style="list-style-type: none"> No additional Voice Biometric Fee proposed; cost included in rate REGARDLESS of utilization. Proposed validation fee: 8% per call All other recurring fees are prohibited. All other non-recurring fees are prohibited. Ability to file for New Technology Fee approval: NOT PROPOSED 																					
Taxes and Regulatory Fees	<ul style="list-style-type: none"> Pass-through of government-defined taxes and mandated regulatory fees applied as directed in the applicable law or regulation with no mark-up or additive. All call rates proposed in this document are subject to the addition of applicable taxes and mandated regulatory fees. Taxes and regulatory fees must be calculated and applied at the time of the call or message and not at the time of payment or deposit. 	<ul style="list-style-type: none"> Pass-through of government-defined taxes and mandated regulatory fees applied as directed in the applicable law or regulation with no mark-up or additive. All call rates proposed in this document are subject to the addition of applicable taxes and mandated regulatory fees. Time of calculation and application of taxes/fees: NOT PROVIDED 																					

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Facility Compensation	<ul style="list-style-type: none"> • Establish reasonable Cost Recovery mechanism to fairly compensate facilities. • Only upon implementation of Rate and Fee Caps and Facility Cost Recovery will existing commission arrangements be phased out. • No additional compensation in any form is allowed (including, but not limited to, rental payments, in-kind gifts, technology grants/allowances, exchanges or non-ICS services). 	<ul style="list-style-type: none"> • Commissions will be prohibited: 90 days from the Order’s “adoption” date • No additional compensation in any form is allowed (including, but not limited to, rental payments, in-kind gifts, technology grants/allowances, exchanges or non-ICS services).
Account Statement	<ul style="list-style-type: none"> • Vendors must provide itemized monthly account statement to each prepaid or direct billed customer; may be provided electronically—either posted on-line or delivered via email. • Customer may request printed statement and ICS vendor may charge no more than \$2.00 for each printed monthly statement. • Debit account statements will be made available at no cost to inmates upon request to resolve account balance disputes. 	<ul style="list-style-type: none"> • Provision of electronic account statements to customers: NOT PROPOSED • Provision of printed account statements to customers: NOT PROPOSED • Provision of debit statements to inmates: NOT PROPOSED
Reporting, Enforcement and Compliance	<ul style="list-style-type: none"> • Annual reporting. <ul style="list-style-type: none"> ○ To include summary of each Prison and Jail facility served, ADP, annual calls and minutes of use, whether or not Voice Biometrics is utilized, and the rates/fees in place at each. • Compliance with regulations must be certified annually by a company executive/officer. <ul style="list-style-type: none"> ○ To include rates, fees, facility cost recovery, refunds, and state unclaimed property laws. 	<ul style="list-style-type: none"> • Annual reporting. • Certification of compliance with regulations must be signed by the CEO, CFO and General Counsel. <ul style="list-style-type: none"> ○ To include rates, fees, and facility cost recovery. • Commitment to compliance with state unclaimed property laws: NOT PROPOSED
Posting/Notice Requirement	<ul style="list-style-type: none"> • Vendors must post facility-specific rates and fees for all services. <ul style="list-style-type: none"> ○ To be visible to inmates on-site. ○ Provided to consumers on written material on-site. ○ Option to hear rates and fees provided orally to consumers prior to call acceptance. ○ Provided to consumers on the Vendor website prior to setting up an account. • Vendor websites must provide a link to the FCC Enforcement Bureau website and the applicable state regulatory agency website. 	<ul style="list-style-type: none"> • Requires visible posting of rates. • Oral disclosure of rates. • Disclosure of rates on vendor websites. • Disclosure of rates on printed materials. • Link to FCC Enforcement Bureau website and applicable state regulatory agency websites: NOT PROPOSED

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Refunds	<ul style="list-style-type: none"> • Must be provided at no cost. • Vendors must refund unused account balances after 6 months of inactivity. Any refund mechanism used must either be in a negotiable form (i.e., check) or exchangeable for a check by the account holder. Example: a refund in the form of a prepaid calling card which may be used to place calls from any phone; exchanged for credit on another customer account with vendor; or exchanged for a refund check. • All vendors must comply with state unclaimed property laws as they pertain to unused account balances and refunds; eliminates practice of absorption of unused funds. 	<ul style="list-style-type: none"> • Refund fee eliminated. • Permits continuation of existing policy which allows company to absorb unused funds after predefined time period. • Requirement to automatically refund inactive account balances: NOT PROPOSED • Commitment of compliance with state unclaimed property laws: NOT PROPOSED
ADA Compliance	<ul style="list-style-type: none"> • Will continue to comply with all existing obligations and laws regarding serving people with disabilities. • Requires that deaf and hard of hearing inmates will have full access to TDD/TTY services at no additional charge. • ICS Vendors will work with confinement facilities where requested to enable video relay services. 	<ul style="list-style-type: none"> • Will continue to comply with all existing obligations and laws regarding serving people with disabilities. • Deaf and hard of hearing inmates afforded access to telecommunications equivalent to those available to hearing inmates.

*** Note: The Global Tel*Link, Securus, Telmate Proposal requires that it be accepted in its entirety. Individual terms are non-negotiable.**