Human Rights Defense Center

DEDICATED TO PROTECTING HUMAN RIGHTS

September 8, 2015 **Submitted Online Only**

The Honorable Tom Wheeler, Chairman
Federal Communications Commission
445 12th St. S.W.
Washington, D.C. 20554

Re: Comment for WC Docket 12-375

Dear Chairman Wheeler:

The Human Rights Defense Center (HRDC) respectfully submits this comment for WC Docket No. 12-375 to provide a new perspective on the many thousands of pieces of financial data that have been entered on this Docket with respect to prison and jail phone services. Simply put, the value of each $0.01/min. reduction in ICS rates resulting from action taken by the Commission is worth significantly more than a penny to this nation's prisoners and their families.

The California Technology Agency included 2010 call volume as Attachment 1 to Agreement OPT 11-126805 for ICS.[1] **See Exhibit 1**. According to that data, 91,935,235 minutes of in-state calls (not including local calls) were made from prisoners housed in California Department of Corrections and Rehabilitation (CDCR) adult and juvenile facilities in 2010. Thus, each $0.01/min. reduction in ICS rates would result in annual savings to CDCR prisoners and their families of $919,352.35, or almost $1 million.

The Arizona Department of Corrections (AZ DOC) included 2013 call volume data in its Solicitation No. ADOC14-00003887/14/066-24 for inmate calling services.[2] **See Exhibit 2**. In-state call volume from prisoners in the AZ DOC (not including local calls) totaled 12,892,932 minutes in 2013. *Id*. Reducing ICS rates by $0.01/min. would save AZ DOC prisoners and their family members $128,929.32 per year.

[1] https://www.prisonphonejustice.org/media/phonejustice/CA_Contract_with_GTL_20122018_Part2.pdf at pp. 341-342, attached as Exhibit 1 for the Commission's convenience
[2] https://www.prisonphonejustice.org/media/phonejustice/AZ%20Contract%20with%20CenturyLink%202014-2019%20Part%201.pdf at p. 17, attached as Exhibit 2 for the Commission's convenience

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Census data updated in 2011 indicates that both California and Arizona experienced "significant increases in the number of children living in poverty and the number of people living in deep poverty. The Census defines people in deep poverty when they make 50% below the poverty line, which is $23,050 for a family of four."[3] Numerous filings on this Docket demonstrate that a disproportionate number of prisoners and their families are poor.[4] The annual savings that would result from each $0.01/minute reduction in ICS rates for prisoners' families in California and Arizona would be significant and, in some cases, would eliminate the need for hard choices to be made between staying in touch with loved ones during critical times of incarceration and buying food or paying rent and utilities.

Each $0.01/min. ICS rate reduction is just as significant to families in states with small prisoner populations as it is to families with loved ones in the CDCR or AZ DOC. Prisoners in the South Dakota DOC, which has a population of just 3,651,[5] placed in-state calls (excluding local calls) totaling 3,962,119 minutes from April 2014 through March 2015.[6] **See Exhibit 3**. A reduction in ICS rates of just one penny per minute is thus worth $39,621.19 annually to South Dakota prisoners and their family members.

HRDC remains steadfast in our position that ICS rates should be capped at $.05/min. for all types of calls, and we note at least eight state DOCs *already charge ICS rates at or below that level*.[7] ICS rates at CDCR prisons are $0.135/min. for all intrastate calls, and a reduction in ICS rates at CDCR facilities to $0.05/min. (a reduction of $0.085 per minute) would result in annual savings to California prisoners and their families of $7,814,495.

The AZ DOC charges a $2.00 connection fee + $.24/min. for prepaid/debit intrastate interLATA calls, and a $2.40 connection fee + $.24/min. for collect interLATA calls. Prepaid/debit intrastate intraLATA calls require a $1.60 connection fee + $0.20/min., and there is a $2.00 connection fee for collect intraLATA calls + $0.20/min.[8] A rate reduction of $0.19/min. would bring current intrastate interLATA per-minute rates down to $0.05/min. and save Arizona prisoners and their families $2,449,657 annually, while reducing the intrastate intraLATA rates by $0.15/min. to $0.05/min. would result in savings of $1,933,939.80. Although the combined annual savings of $4,383,596.80 for intrastate calls to Arizona families would be huge, the elimination of the connection fee required for each phone call is equally important. The AZ DOC tallied 974,799 intrastate calls during 2013 (not including local calls) **(Exhibit 2)**. The total cost for connection fees alone was just under $2 million ($1,999,281.60), paid by prisoners and their families, many of them poor, for the "privilege" of then paying an additional intrastate rate of $0.20-.24/min.

For this reason, in addition to our position that ICS rates should be capped at $0.05/min. for all types of calls, we renew our call for the Commission to abolish not only ICS connection fees but all ancillary fees related to ICS, which serve as nothing more than another unjustified way to price gouge prisoners and their families. Unless the issue of fees is addressed, any rate caps

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[3] www.usatoday.com/story/news/nation/2014/10/06/state-poverty-rates-unemployed/1585837; the 2015 federal poverty level for a family of four is $24,250. *See* http://familiesusa.org/product/federal-poverty-guidelines

[4] *Also see*, e.g., "Prisons of Poverty: Uncovering the pre-incarceration incomes of the imprisoned," Prison Policy Initiative (July 9, 2015); www.prisonpolicy.org/reports/income.html

[5] www.bjs.gov/content/pub/pdf/p13.pdf (Table 2)

[6] Pay Tel Communications, Inc. Notice of *Ex Parte (*Attachment 1), Docket WC 12-375 filed August 24, 2015, relevant page attached as Exhibit 3 for the Commission's convenience

[7] Human Rights Defense Center Comment, Docket WC 12-375, filed July 29, 2015

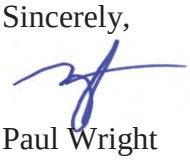
[8] www.prisonphonejustice.org/media/phonejustice/AZ%20Rate%20Sheet%202014.pdf

imposed by the FCC will be easily circumvented by ICS providers and correctional facilities, as we have seen happen since the implementation of interstate ICS rate caps in February 2014.

We further call on the Commission to eliminate an industry practice of creating "flat rates" by multiplying capped rates times the maximum number of minutes allowed for the call (i.e., a 15-minute prepaid interstate ICS call rated at $0.21/min. is billed at a flat rate of $3.15, regardless of the actual call duration). This practice, which has become more common since the FCC capped interstate ICS rates, can result in extremely high effective rates when calls are required to be cut short by either party. As the Commission is aware from the evidence in this record, dropped calls through no fault of the prisoner or call recipient require double-payment of the flat rate when the prisoner calls back. All parties to ICS calls should pay for actual call minutes used and nothing more. These changes should go into effect within 60 days of the filing of the Commission's next Order that addresses ICS reforms.

Please feel free to contact me should you require any additional information.

Sincerely,



Paul Wright
Executive Director, HRDC

Attachments

EXHIBIT 6-K3 CDCR 2010 IWTS CALL VOLUME BY CALL TYPE

		Total		Local		IntraLATA		InterLATA		Interstate		International	
	Total	Calls	Minutes	Calls	Minutes	Calls	Minutes	Calls	Minutes	Calls	Minutes	Calls	Minutes
Jan-2010	Adult	672,633	8,296,976	28,308	341,806	162,344	2,009,788	453,360	5,601,767	27,989	336,091	632	7,524
	Youth	18,630	213,325	1,278	13,611	5,920	65,002	11,223	132,559	209	2,153		
	Total:	691,263	8,510,301	29,586	355,417	168,264	2,074,790	464,583	5,734,326	28,198	338,244	632	7,524
Feb-2010	Adult	665,041	8,178,300	27,862	333,621	164,757	2,032,887	445,434	5,488,813	26,365	315,483	623	7,496
	Youth	17,875	202,881	1,085	11,340	5,052	54,399	11,479	134,692	259	2,450		
	Total:	682,916	8,381,181	28,947	344,961	169,809	2,087,286	456,913	5,623,505	26,624	317,933	623	7,496
Mar-2010	Adult	620,218	7,644,228	25,718	310,473	154,397	1,902,310	414,187	5,116,740	25,423	308,747	493	5,958
	Youth	15,085	172,542	807	8,461	3,643	39,073	10,369	122,082	266	2,926		
	Total:	635,303	7,816,770	26,525	318,934	158,040	1,941,383	424,556	5,238,822	25,689	311,673	493	5,958
Apr-2010	Adult	686,102	8,446,906	25,910	309,275	176,285	2,175,345	455,041	5,611,644	28,261	343,341	605	7,301
	Youth	17,786	207,170	845	9,258	4,321	46,563	12,445	149,470	175	1,879		
	Total:	703,888	8,654,076	26,755	318,533	180,606	2,221,908	467,486	5,761,114	28,436	345,220	605	7,301
May-2010	Adult	642,232	7,900,932	25,343	301,276	164,502	2,036,223	425,474	5,239,482	26,406	317,912	507	6,039
	Youth	16,702	192,600	848	9,272	3,855	41,450	11,812	139,741	187	2,137		
	Total:	658,934	8,093,532	26,191	310,548	168,357	2,077,673	437,286	5,379,223	26,593	320,049	507	6,039
Jun-2010	Adult	648,541	7,967,671	23,922	282,837	169,857	2,099,259	428,124	5,262,293	26,136	317,036	502	6,246
	Youth	17,545	201,861	871	9,708	3,995	43,606	12,479	146,222	200	2,325		
	Total:	666,086	8,169,532	24,793	292,545	173,852	2,142,865	440,603	5,408,515	26,336	319,361	502	6,246
Jul-2010	Adult	636,056	7,854,408	23,611	283,715	162,503	2,019,170	423,446	5,227,663	26,014	317,783	482	6,077
	Youth	18,003	210,942	715	7,398	4,378	48,465	12,657	152,176	253	2,903		
	Total:	654,059	8,065,350	24,326	291,113	166,881	2,067,635	436,103	5,379,839	26,267	320,686	482	6,077

Exhibit 1

EXHIBIT 6-K3 CDCR 2010 IWTS CALL VOLUME BY CALL TYPE (CONTINUED)

		Total		Local		IntraLATA		InterLATA		Interstate		International	
	Total	Calls	Minutes	Calls	Minutes	Calls	Minutes	Calls	Minutes	Calls	Minutes	Calls	Minutes
Aug-2010	Adult	655,092	8,064,897	24,554	292,897	167,661	2,072,211	435,712	5,368,890	26,646	324,113	519	6,786
	Youth	17,603	206,100	650	6,554	4,325	49,132	12,440	148,181	188	2,233		
	Total:	672,695	8,270,997	25,204	299,451	171,986	2,121,343	448,152	5,517,071	26,834	326,346	519	6,786
Sep-2010	Adult	664,298	8,184,940	23,759	282,959	176,797	2,185,444	435,381	5,369,457	27,724	339,014	637	8,066
	Youth	17,349	202,707	670	6,892	3,761	42,798	12,745	150,843	173	2,174		
	Total:	681,647	8,387,647	24,429	289,851	180,558	2,228,242	448,126	5,520,300	27,897	341,188	637	8,066
Oct-2010	Adult	647,655	7,981,586	23,087	273,434	172,452	2,131,937	424,859	5,241,978	26,626	326,439	631	7,798
	Youth	15,644	182,124	649	6,600	3,371	38,420	11,517	135,742	107	1,362		
	Total:	663,299	8,163,710	23,736	280,034	175,823	2,170,357	436,376	5,377,720	26,733	327,801	631	7,798
Nov-2010	Adult	691,334	8,519,584	24,307	290,385	181,509	2,240,380	456,087	5,629,728	28,708	349,985	723	9,106
	Youth	17,405	204,080	459	4,782	3,422	39,078	13,344	158,125	180	2,095		
	Total:	708,739	8,723,664	24,766	295,167	184,931	2,279,458	469,431	5,787,853	28,888	352,080	723	9,106
Dec-2010	Adult	670,389	8,212,836	23,547	280,086	179,521	2,198,994	438,546	5,383,664	28,118	341,783	657	8,309
	Youth	18,405	216,751	429	4,075	3,694	42,387	14,164	168,962	118	1,327		
	Total:	688,794	8,429,587	23,976	284,161	183,215	2,241,381	452,710	5,552,626	28,236	343,110	657	8,309
Annual sum		**8,107,623**	**99,666,347**	**309,234**	**3,680,715**	**2,082,322**	**25,654,321**	**5,382,325**	**66,280,914**	**326,731**	**3,963,691**	**7,011**	**86,706**

Exhibit 2

2 SCOPE OF WORK

2.1 OVERVIEW

2.1.1 The Arizona Department of Corrections (Department) is soliciting a qualified Contractor to provide telecommunication services and equipment, to ensure that inmates in prison, pre-release and work release facilities are provided access to public telephones subject to limitations and restrictions necessary to safeguard the security and order of the facility, and to protect the public from unwanted inmate calls. This RFP will establish a single contract for the implementation and operation of a turnkey inmate telephone system with integrated recording and monitoring capabilities to meet current and future legislative requirements.

2.1.2 The Department intends to enter into a contract with a single Contractor who will provide complete logistical support, ongoing operation, and maintenance of the inmate telecommunications system/services 21 correctional facilities.

2.1.3 This RFP is expected to result in the award of a single contract with the Contractor who best meets the stated requirements and provides competitive prices for inmates, inmate families and friends. The proposed solution is for a turnkey system to include, among other things, installation, maintenance, telephones, communications, enclosures, panel and such other equipment or materials necessary to replace the current inmate telephone system/services. All existing telephones must be replaced with new/unused equipment by the awarded Contractor.

2.2 GENERAL BACKGROUND

2.2.1 The Department, an executive-branch agency of the Arizona State Government, employs approximately 10,000 individuals who are responsible for approximately 42,000 inmates in the state prison system. The Department operates 16 state prison facilities and supervises 6 privatized prison sites within the State of Arizona, which vary significantly in size and geographic location.

2.2.2 For the year of 2013 inmates completed approximately:

Product	Year	Destination Zone	Calls	Minutes
Collect	2013	InterLATA / Interstate	97,941	1,284,672
Collect	2013	InterLATA / Intrastate	282,946	3,834,793
Collect	2013	International	27	404
Collect	2013	IntraLATA / Interstate	61	852
Collect	2013	IntraLATA / Intrastate	450,417	6,137,150
Collect	2013	Local	831,716	11,517,610
Debit	2013	InterLATA / Interstate	32,983	368,654
Debit	2013	InterLATA / Intrastate	82,699	972,957
Debit	2013	International	14,581	166,466
Debit	2013	IntraLATA / Interstate	15	162
Debit	2013	IntraLATA / Intrastate	158,737	1,948,032
Debit	2013	Local	415,886	5,767,033
		Totals:	**2,368,009**	**31,998,785**

ATTACHMENT A

Minutes/Month by Call Type

Call Type	Mar-15	Feb-15	Jan-15	Dec-14	Nov-14	Oct-14	Sep-14	Aug-14	Jul-14	Jun-14	May-14	Apr-14	Total
Advance Pay Canada	432	128	113	155				6	10	27			871
Advance Pay Interstate Interlata	60,595	63,144	58,946	57,223	55,016	52,173	52,085	52,906	50,208	53,931	40,430	43,300	639,957
Advance Pay interstate Intralata								79	104	20			203
Advance Pay intrastate Interlata		89	36	93	84	17			46	660	3,887	3,885	8,797
Advance Pay intrastate Intralata	190,727	184,663	159,723	158,912	156,663	147,432	150,432	146,187	145,519	157,092	107,962	132,545	1,837,857
Advance Pay Local	138,117	126,569	112,527	105,813	104,242	109,629	134,402	136,943	133,281	125,160	74,521	71,556	1,372,760
Advance Pay US Terrritories								11					11
Advance Pay Other International										29	208	256	493
Collect International										10			10
Collect Interstate interlata	2,628	3,586	3,222	4,232	3,514	3,505	2,754	3,164	3,043	4,842	3,679	3,691	41,860
Collect Interstate intralata	37	40	33	156	20	27			19				332
Collect Intrastate intralata	5,060	5,281	4,772	6,064	4,546	4,395	5,000	6,104	6,482	10,095	8,285	9,011	75,095
Collect Local	1,317	1,649	2,221	1,855	1,162	1,238	1,665	2,072	3,191	4,289	2,565	2,136	25,360
Collect US Territories	311	20											331
Debit Canada			4				3			2			9
Debit Interstate Interlata	52,504	50,399	51,799	52,781	49,097	52,204	48,508	49,501	45,907	65,325	75,052	84,754	677,831
Debit Interstate Intralata	398	473	159	135	200	273	215	243	193				2,289
Debit Intrastate Interlata										2,113	12,645	16,690	31,448
Debit Intrastate Intralata	156,000	167,803	155,056	151,397	153,388	162,714	157,899	166,923	152,627	197,249	230,626	272,580	2,124,262
Debit Local	131,392	136,164	132,530	132,189	128,435	120,206	120,492	114,393	112,547	134,066	169,349	178,043	1,609,806
Debit Mexico											41	12	53
Debit Non-US Caribbeans		2											2
Debit Other International	25	41	72	59	40	83	109	106	37	2	53	84	711
Debit US Territories	82	55	29	20	61		5	34	2	2			290
Total	739,625	740,106	681,242	671,084	656,468	653,896	673,569	678,672	653,216	754,914	729,303	818,543	8,450,638

Revenues/Month by Call Type

Call Type	Mar-15	Feb-15	Jan-15	Dec-14	Nov-14	Oct-14	Sep-14	Aug-14	Jul-14	Jun-14	May-14	Apr-14	Total
Advance Pay Canada	$ 540.00	$ 168.00	$ 145.00	$ 199.00				$ 14.00	$ 18.00	$ 39.00			$ 1,123.00
Advance Pay Interstate Interlata	$ 11,133.00	$ 11,664.81	$ 10,854.99	$ 10,533.87	$ 10,051.74	$ 9,627.12	$ 9,604.35	$ 9,760.59	$ 9,342.27	$ 10,006.83	$ 7,475.38	$ 7,876.44	$ 117,931.39
Advance Pay Interstate Intralata								$ 13.86	$ 20.16	$ 3.15			$ 37.17
Advance Pay intrastate Interlata		$ 16.11	$ 7.29	$ 17.82	$ 15.66	$ 2.88			$ 9.54	$ 113.42	$ 697.00	$ 687.34	$ 1,567.06
Advance Pay intrastate Intralata	$ 32,227.20	$ 31,284.81	$ 27,176.84	$ 26,981.81	$ 26,754.54	$ 25,119.19	$ 25,289.75	$ 24,581.13	$ 24,454.34	$ 26,482.22	$ 18,096.01	$ 22,030.88	$ 310,478.72
Advance Pay Local	$ 8,178.30	$ 7,599.60	$ 6,543.00	$ 6,192.90	$ 6,080.40	$ 6,396.30	$ 7,697.70	$ 7,883.10	$ 7,596.90	$ 7,192.80	$ 4,306.50	$ 4,224.60	$ 79,892.10
Advance Pay US Terrritories								$ 2.31					$ 2.31
Advance Pay Other International										$ 31.89	$ 228.68	$ 281.44	$ 542.01
Collect International										$ 18.00			$ 18.00
Collect Interstate interlata	$ 742.50	$ 948.75	$ 847.50	$ 1,091.25	$ 993.75	$ 933.75	$ 738.75	$ 817.50	$ 877.50	$ 1,350.00	$ 971.25	$ 1,087.50	$ 11,400.00
Collect Interstate intralata	$ 7.50	$ 20.60	$ 15.00	$ 41.25	$ 3.75	$ 15.00			$ 3.75				$ 106.85
Collect Intrastate intralata	$ 2,254.96	$ 2,429.27	$ 2,092.96	$ 2,541.32	$ 1,960.34	$ 1,910.49	$ 2,228.56	$ 2,646.28	$ 2,773.54	$ 4,138.77	$ 3,364.63	$ 3,708.01	$ 32,049.13
Collect Local	$ 297.00	$ 388.80	$ 407.70	$ 459.00	$ 294.30	$ 283.50	$ 361.80	$ 459.00	$ 648.00	$ 826.20	$ 545.40	$ 507.60	$ 5,478.30
Collect US Territories	$ 77.75	$ 5.00											$ 82.75
Deibt Canada			$ 12.00							$ 10.00			$ 22.00
Debit Interstate Interlata	$ 9,821.61	$ 9,337.86	$ 9,496.26	$ 9,782.35	$ 9,209.88	$ 9,885.79	$ 9,214.21	$ 9,182.88	$ 8,664.93	$ 12,429.50	$ 14,192.59	$ 16,057.61	$ 127,275.47
Debit Interstate Intralata	$ 76.32	$ 88.47	$ 25.11	$ 27.00	$ 42.30	$ 46.17	$ 38.25	$ 42.12	$ 38.97				$ 424.71
Debit Intrastate Interlata										$ 373.87	$ 2,378.61	$ 3,127.60	$ 5,880.08
Debit Intrastate Intralata	$ 26,679.05	$ 28,616.24	$ 26,328.54	$ 25,904.74	$ 26,501.26	$ 28,167.05	$ 27,188.27	$ 28,581.27	$ 26,253.44	$ 34,141.50	$ 39,769.82	$ 47,308.30	$ 365,439.48
Debit Local	$ 8,917.00	$ 9,219.00	$ 8,837.00	$ 8,868.00	$ 8,548.00	$ 8,166.10	$ 8,227.00	$ 7,564.10	$ 7,381.00	$ 9,044.00	$ 11,519.00	$ 11,972.00	$ 108,262.20
Debit Mexico													$ -
Debit Non-US Caribbeans		$ 6.00									$ 63.45	$ 23.95	$ 93.40
Debit Other International	$ 41.00	$ 53.00	$ 112.00	$ 103.00	$ 68.00	$ 111.00	$ 137.00	$ 154.00	$ 53.00	$ 10.00	$ 92.03	$ 132.64	$ 1,066.67
Debit US Territories	$ 17.22	$ 11.55	$ 6.09	$ 4.20	$ 12.81		$ 1.05	$ 7.14	$ 0.42	$ 0.42			$ 60.90
Total	$ 101,010.41	$ 101,857.87	$ 92,907.28	$ 92,747.51	$ 90,536.73	$ 90,664.34	$ 90,726.69	$ 91,709.28	$ 88,135.76	$ 106,211.57	$ 103,700.35	$ 119,025.91	$ 1,169,233.70

Commissions/Month by Call Type

Call Type	Mar-15	Feb-15	Jan-15	Dec-14	Nov-14	Oct-14	Sep-14	Aug-14	Jul-14	Jun-14	May-14	Apr-14	Total

Exhibit 3

Advance Pay Canada	$ 178.20	$ 55.44	$ 47.85	$ 65.67					$ 4.62	$ 5.94	$ 12.87				$ 370.59
Advance Pay Interstate Interlata		$ -	$ -												$ -
Advance Pay Interstate Intralata															$ -
Advance Pay intrastate Interlata		$ 5.32	$ 2.41	$ 5.88	$ 5.17	$ 0.95				$ 3.15	$ 37.43	$ 230.01	$ 226.82		$ 517.14
Advance Pay intrastate Intralata	$ 12,246.34	$ 11,888.23	$ 10,327.20	$ 10,253.09	$ 10,166.73	$ 9,545.29	$ 9,610.11	$ 9,340.83	$ 9,292.65	$ 10,063.24	$ 6,876.48	$ 8,371.73			$ 117,981.92
Advance Pay Local	$ 3,107.75	$ 2,887.85	$ 2,486.34	$ 2,353.30	$ 2,310.55	$ 2,430.59	$ 2,925.13	$ 2,995.58	$ 2,886.82	$ 2,733.26	$ 1,636.47	$ 1,605.35			$ 30,358.99
Advance Pay US Terrritories															$ -
Advance Pay Other International										$ 10.52	$ 75.46	$ 92.88			$ 178.86
Collect International										$ 5.94					$ 5.94
Collect Interstate interlata		$ -	$ -												$ -
Collect Interstate intralata		$ 6.80	$ -												$ 6.80
Collect Intrastate intralata	$ 856.88	$ 923.12	$ 795.32	$ 965.70	$ 744.93	$ 725.99	$ 846.85	$ 1,005.59	$ 1,053.95	$ 1,572.73	$ 1,278.56	$ 1,409.04			$ 12,178.66
Collect Local	$ 112.86	$ 147.74	$ 154.93	$ 174.42	$ 111.83	$ 107.73	$ 137.48	$ 174.42	$ 246.24	$ 313.96	$ 207.25	$ 192.89			$ 2,081.75
Collect US Territories		$ -	$ -												$ -
Debit Canada			$ 2.00				$ 2.00			$ 2.00					$ 6.00
Debit Interstate Interlata		$ -	$ -												$ -
Debit Interstate Intralata		$ 34.00	$ 8.00	$ 11.00	$ 18.00	$ 16.00	$ 14.00	$ 15.00	$ 16.00						$ 132.00
Debit Intrastate Interlata	$ 30.00									$ 136.00	$ 918.00	$ 1,203.00			$ 2,287.00
Debit Intrastate Intralata	$ 11,185.00	$ 11,959.00	$ 10,950.00	$ 10,866.00	$ 11,235.00	$ 11,965.00	$ 11,484.00	$ 11,998.00	$ 11,077.00	$ 14,502.00	$ 16,817.00	$ 20,145.00			$ 154,183.00
Debit Local	$ 8,917.00	$ 9,219.00	$ 8,837.00	$ 8,868.00	$ 8,548.00	$ 8,165.00	$ 8,227.00	$ 7,564.00	$ 7,381.00	$ 9,044.00	$ 11,519.00	$ 11,972.00			$ 108,261.00
Debit Mexico															$ -
Debit Non-US Caribbeans		$ 1.00	$ -								$ 3.00	$ 2.00			$ 6.00
Debit Other International	$ 4.00	$ 3.00	$ 10.00	$ 11.00	$ 7.00	$ 7.00	$ 7.00	$ 12.00	$ 4.00	$ 2.00	$ 8.00	$ 15.00			$ 90.00
Debit US Territories	$ 7.00	$ 4.00	$ 3.00	$ 1.00	$ 8.00		$ 2.00	$ 5.00	$ 2.00	$ 2.00					$ 34.00
Total	$ 36,645.03	$ 37,134.50	$ 33,624.05	$ 33,575.06	$ 33,155.21	$ 32,963.55	$ 33,255.57	$ 33,115.04	$ 31,968.75	$ 38,437.95	$ 39,569.23	$ 45,235.71			$ 428,679.65

Due to FCC ruling, we have not received commission revenue on interstate calls since February 2014.