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VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Securus Petition for Declaratory Ruling, WC Docket No. 09-144*

Dear Ms. Dortch:

By this letter, we respectfully request that the Federal Communications Commission (“Commission” or “FCC”) deny the Petition for Declaratory Ruling (“Petition”) by Securus Technologies, Inc. (“Securus”) in the above-referenced proceeding. We further urge the Commission promptly to order Securus, and other inmate telephone service providers, to cease improperly blocking local numbers issued by CheapJailCalls.com to friends and family members of inmates. CheapJailCalls.com is a reputable VoIP company with an A- rating from the Better Business Bureau and it has received no complaints in over eighteen months of business. Despite this, Securus regularly claims to CheapJailCalls.com customers that it is an illegitimate and fraudulent business and that use of its services is illegal. Even though the Commission has not yet acted on Securus’ pending petition, Securus and similar providers also continue to block the ability of inmates to place calls to CheapJailCalls.com’s customers, harming our ability to compete effectively and risking compromising our positive reputation. We join Millicorp in asking the Commission to establish bright-line rules to prevent further discriminatory and illegal call blocking by inmate telephone service providers such as Securus.

Securus has claimed that services like CheapJailCalls.com do not serve the public. In contrast, we believe that keeping families in contact with their incarcerated loved ones, thereby providing a support network for inmates, will reduce the chances that an inmate will return to prison. Inmates are often put in prisons far away from their homes and may not receive frequent visits. Consistent with our belief that inmates and their families should not be penalized solely based on geography, our service ensures that inmates can reach family members affordably, regardless of where family members are located or where the inmates are incarcerated.

Securus and Global Tel*Link (“Global Tel”) have told our customers that CheapJailCalls.com is a fraudulent and illegal service, and that their inmate relatives may face repercussions for using our service. This false information perpetuated by Securus and Global Tel has resulted in lost revenue due to cancellations and returns, in addition to losing potential customers who likely avoided our service altogether due to such false claims. As a result, CheapJailCalls.com has been forced to expend significant resources and manpower to defend its reputation, both with outreach to individual customers and also more generally in the marketplace.

Moreover, despite claims by Securus and Global Tel that CheapJailCalls.com and its competitors offer “call diversion,” “dial around schemes,” or other illegitimate services, Global Tel certainly is aware that VoIP business such as ours are indeed legitimate. In fact, Global Tel refers customers, including customers of its inmate calling services, to comparable providers through one of its wholly-owned subsidiaries, DSI-ITI, LLC (“DSI-ITI”). DSI-ITI operates OffenderConnect, a website that provides services to the friends and families of inmates.¹ DSI-ITI also operates ConnectNetwork.com, which supplies certain support services to OffenderConnect and its parent Global Tel, among others.² OffenderConnect’s website refers customers to a landing page that promotes VoIP services and that is operated by the affiliated ConnectNetwork. Specifically, ConnectNetwork’s landing page refers users to VoIP telephone services provided by PhonePower.com and Phone.com, and suggests that customers “can get clear, dependable service at a great price – simply by changing to a digital phone provider.”³ These services allow local number porting and call termination to single or multiple phone numbers, regardless of location⁴ – *the same calling options and technology features that Securus and Global Tel have called unsecure “call diversion” and “dial around schemes” to justify blocking services like CheapJailCalls.com.* Thus, Global Tel not only acknowledges that the provision of VoIP is a legitimate business, but expressly refers the friends and families of inmates to certain VoIP providers with which Global Tel has a business arrangement and which compete with CheapJailCalls.com.

Accordingly, we strongly urge the Commission to take immediate action to deny Securus’ petition and stop Securus and Global Tel from impermissibly blocking services like

¹ See <https://www.offenderconnect.com/portal>.

² See <https://www.offenderconnect.com/ConnectNetwork#>. The website is also available through <http://www.connectnetwork.com>. The domain names of OffenderConnect.com and ConnectNetwork.com seem to be used somewhat interchangeably when a user navigates the websites. For example, several identical webpages are available through either domain, and a link to ConnectNetwork.com’s privacy policy instead leads to OffenderConnect’s privacy policy.

³ <http://www.connectnetwork.com/VOIP/>. The website is also available at <https://www.offenderconnect.com/VOIP/>.

⁴ See <http://www.phone.com/connectnetwork/>; <http://www.phonepower.com/services/voip/resdetail.aspx>.

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CheapJailCalls.com, harming our business and reputation, and reducing valuable service options for inmates and their families.

Best regards,

S/James K. Dank

James K. Dank
President
CheapJailCalls.com