

**Before the
Federal Communications Commission
Washington, D.C. 20554**

Rates for Interstate Inmate Calling Services

WC Docket No. 12-375

DECLARATION OF CURTIS L. HOPFINGER

Curtis L. Hopfinger deposes and states:

1. I am the Director – Regulatory and Government Affairs for Securus Technologies, Inc. (“Securus”), and my business address is 14651 Dallas Parkway, Sixth Floor, Dallas, TX 75254. I have personal knowledge of the matters stated herein and am competent to testify as to the same.

2. The purpose of this declaration is to provide the Commission with facts and data regarding Securus’s service and its experience in the inmate telecommunications service market.

SECURUS’S EXPERIENCE WITH COMPETITIVE BIDDING

3. Securus presently holds contracts with approximately 1,800 correctional authorities covering roughly 2,200 facility locations in 45 states around the country. Securus serves city, county, and state facilities. With regard to the contracting process, although I am not responsible for compiling and submitting bids in response to Requests for Proposals (“RFPs”), I do assist in the responses and am aware generally of the bidding process.

4. For the state contracts Securus has bid, generally there are four to five total bidders. For county and city contracts, the larger-volume facilities generally receive five to seven bids. For small county and city contracts, usually five to seven companies submit bids.

5. In the last three years, more than seven Securus bid awards have been protested by a competitor. One instance is the New Mexico Department of Corrections (“NMDOC”) contract in 2009. Securus was awarded the contract in early 2009. A competitor protested that bid award on the ground that its rate was lower than Securus’s by a few cents. In response, the NMDOC nullified the bid award and issued another RFP in 2010.

SECURUS’S ROLE IN PROVIDING CALLING SERVICES TO SPEECH-IMPAIRED AND HEARING-IMPAIRED PERSONS

6. Securus furnishes and maintains the TeleTypewriter (“TTY”) devices that enable speech or hearing impaired inmates and/or persons an inmate may call, to place or receive inmate telephone calls. I can explain the role that Securus plays in facilitating these calls.

7. There are three types of TTY calls that can be placed from correctional facilities: Voice to TTY; TTY to Voice; and TTY to TTY. Each type of TTY call has a slightly different call path. Attached hereto are graphical depictions of each type of call, and I attest that they are true and accurate to the best of my knowledge. **Attachments 1, 2, and 3.**

8. The most common type of TTY call is **TTY to Voice**, where a speech or hearing impaired inmate is calling out to a person without a speech or hearing impairment. Att. 1. For that call, a TTY console is made available to the inmate. When an inmate initiates a TTY to Voice call, he or she dials a 1-800 number, or the three digit abbreviated code, to the Telecommunications Relay Service (“TRS”) entity that serves the resident state. The call from the correctional facility to the TRS is connected and carried by Securus completely free of charge — neither the inmate, nor the correctional facility, nor the called party pays for the call from the correctional facility to the TRS operator. For inmate calls to TRS, Securus does include the appropriate Operator Line Identification (OLI) code to notify the TRS operator the call is from a correctional institution.

9. In my understanding, most states award one exclusive contract to one TRS provider for a term of years, and that provider handles all TTY calls originated in that state. The TRS provider typically is regulated by the resident state utility commission.

10. When the inmate is connected to the resident TRS entity, Securus is finished with that call. From there, the TRS entity initiates a call to the called party via an interexchange carrier (“IXC”) that holds the contract with the TRS entity. For that call, the receiving party may be charged the IXC carrier’s tariffed rate for a collect call. Securus is not the carrier for these calls and does not rate, bill, collect, or receive revenue from them. These are collect calls. Because Securus completes the call to the TRS operator at no charge and does not carry, nor have any control over, the call initiated by the TRS operator to the end user, Securus debit or prepaid accounts cannot be used.

11. Attached are pages from several AT&T price lists and tariffs which show the rates that may apply to collect calls placed by the TRS operator to an end-user. **Attachment 4.** The interstate rate table shows that a Service Charge of \$5.99 plus a Usage Rate of \$1.49 per minute is charged for interstate calls. At those rates, a TTY to Voice call from the TRS to the end user is \$20.89 for a 10-minute call.

12. The second type of TTY call is **TTY to TTY**. Att. 2. Securus does handle these calls and, based on the requirements dictated by the correctional institution, the rates that apply are the same Securus rates applied to non-TTY calls from that facility. In some instances, the correctional facility requires that these calls be connected and carried free of charge. Additionally, if requested by the correctional facility, the permitted call length times may be adjusted to a longer period for TTY calls. These calls are placed by the inmate dialing directly to the called party, and no TRS entity is involved.

13. The third and least common type of TTY call is **Voice to TTY**. Att. 3. The call path is similar to the call path of TTY to Voice calls. The inmate dials a 1-800 number, or the three digit abbreviated code, which may be a different number from that used for TTY to Voice calls, and the call to the TRS operator is provided completely free of charge. Securus delivers the call to the resident TRS entity, and the TRS entity initiates the call to the called party via the IXC. That call, again, is normally a collect call.

INCREASED COSTS OF REGULATORY COMPLIANCE AND SERVICE

14. Due to new or strengthened regulations in the telecommunications industry, Securus has experienced an increased cost of regulatory compliance. In large part, these increased costs are the results of how other carriers have handled the new rules.

15. First, our costs of billing and collection have increased due to “cramming” rules. Local exchange carriers (“LECs”) are particularly concerned about the Commission’s heightened sensitivity to consumer allegations of unauthorized charges on monthly telephone bills. In a collect call scenario, Securus still relies on LECs to include inmate call charges on (or “ride on”) the called party’s local phone bill. For these arrangements, Securus must sign billing and collection (“B&C”) contracts with the LECs.

16. The terms of these contracts have become more expensive as federal and state cramming rules have become more strict. Rates for riding on a LEC bill have increased substantially. In addition, and what has really made B&C arrangements prohibitive, LECs have started demanding penalties from Securus if a consumer simply alleges that an inmate call charge is unauthorized. The penalty can be \$100 or more per allegation.

17. It is very common for bill payers to dispute an inmate collect call charge on their phone bill. This has been true for years. The bill payer may not be the person who answered or

accepted the inmate calls, and the bill payer may not realize that someone in the household has accepted an inmate call. Their first reaction is to dispute the charge with their LEC. In virtually every case, an investigation into the charge reveals that the inmate collect call was duly accepted, a conversation took place, and the collect call charges were fully authorized. But the LEC typically has already reversed the disputed charge back to Securus and imposed the penalty that must be paid. The previously disputed, but now explained charge is never put back on the consumer's LEC bill. In many cases, the LEC lists the disputed call as a "cramming" incident with the state regulatory agency. This can occur even after Securus has demonstrated that the charge was authorized and there is no dispute. The purported "cramming" incident requires Securus to spend considerable time and resources to address the false allegations with the agency. These increased charges and expenses have significantly raised Securus's costs.

18. In addition, where Securus does not have or cannot offer a LEC billing arrangement, it will be forced to create a prepaid account or direct billing relationship with a consumer. Ten years ago, these billing methods were unheard of. Now Securus devotes considerable resources to establishing these prepaid accounts and direct billing relationships.

19. Another area in which Securus's costs have gone up is software development. Because of the unique nature of inmate telephone services, in 2012 alone Securus spent over \$4.5 million on the development of safety, security, and investigative software for its inmate telephone systems. For example, Securus is required by the Alaska DOC to block inmate calls to all cellular phones, and the Florida DOC and Texas Department of Criminal Justice require Securus to block calls to pre-paid or "burner" cellular phones (these phones are not registered to an end user or physical address). These restrictions require special system programming. Securus continually updates its existing software to address new threats of fraud and to stay one

step ahead of criminal activity that would attempt to circumvent the systems security features. Further, the correctional facilities Securus serves have come to expect new investigative tools, new ways to be alerted to possible illegal activity, and more convenient ways to access inmate calling information from their facilities.

SITE COMMISSIONS

20. Site commissions are required in the overwhelming majority of contracts that Securus presently holds. The exceptions are Securus contracts with correctional facilities located in New Mexico, where commissions are prohibited by statute. In New York, the former Governor issued an executive order prohibiting site commissions for the NY Department of Corrections. However, City and County correctional facilities located in New York are not prohibited from receiving site commissions. In addition, a small number of correctional facilities who have contracted with Securus, such as the Missouri Department of Corrections, have made the choice not to receive a site commission.

21. Site commissions can take the form of a percentage of gross revenue, a signing bonus, a monthly fixed amount, or a yearly fixed amount. Some correctional facilities that receive percentage based commissions may also require a “Minimum Annual Guarantee” (“MAG”). That is, Securus must contractually guarantee the facility will annually receive at least this MAG amount regardless of the amount of revenue brought in. All forms of site commissions are written terms of the service contracts.

DEBIT AND PREPAID ACCOUNTS

22. Securus has several options for both inmates and called parties to use prepaid calling.

23. Some facilities allow Securus to provide prepaid calling cards — actual physical cards — worth a definite amount of money, such as \$10.00, to be used to make telephone calls over the Securus inmate phone system. These calls are handled and carried by Securus, and the prevailing Securus rates at that facility will be decremented from the card on a minute-of-use basis. These prepaid cards often are sold at the facility’s commissary, just like toiletries and magazines. Securus sells the cards to the facility, and the facility then sells the cards and retains that revenue.

24. The majority of prepaid calling is done with established prepaid accounts. Where permitted, inmates can establish a Securus prepaid account, which enables direct-dial calls, which are controlled by the inmate’s Personal Identification Number. The other option is for the called party to establish a prepaid account with Securus to pay for inmate collect calls.

25. Not all correctional authorities want inmate prepaid calling options. Facilities are particularly concerned about allowing physical calling cards into the prison environment because they can be used by whoever holds them — an inmate could be attacked or robbed for the card. The great majority of the facilities Securus serves do allow prepaid accounts held either by the inmate, called parties, or both. Prepaid accounts can be replenished by check, credit card, on-line banking, and money order. Securus has created an automated system to enable account holders, as well as friends and family members, to deposit funds into a prepaid account via a toll-free call and via the Securus website. Such funding can also be accomplished by talking to a live Securus representative. They are available twenty-four hours a day, seven days a week, 365 day a year.

MANDATORY FREE CALLS WOULD BE VERY DIFFICULT TO IMPLEMENT

26. Providing free calls to incarcerated persons, particularly post-sentencing, can be

very difficult from an operations perspective. It would be especially difficult to implement the Petitioners' request, as I understand it, in which each inmate would be allotted a certain amount of free interstate calls every month.

27. Under this proposal, free calls would be valid to any approved number, and "owned" by the inmate. It would require a completely new billing application. Securus first would need to track each inmate's interstate calls, culled out from the in-state calls. Then Securus would have to calculate somehow what the charges **should** be, and keep a running total. Then Securus would have to configure the system to turn on the billing mechanism once the inmate's interstate calls reach the allotted amount. Securus would have to do this operation for every inmate, every month. Creating that kind of system would be next to impossible.

28. A free-calling mechanism would be only slightly more possible if minutes were tracked instead of dollar amounts. That requirement still would demand a new application that tracks only the interstate calling minutes for each inmate, and would re-start at the first of every month.

29. In addition, the huge cost of trying to develop a mandatory free-call system, over and above the lost revenue from the free interstate calls themselves, would be highly prohibitive for Securus.

THE IMPORTANCE OF PERMITTING PER-CALL CHARGES

30. I am aware that Petitioners' proposal would bar inmate telephone service providers from using a per-call charge in addition to the \$0.25/\$0.20 per-minute charge. Mr. Siwek's report will show from an economic and financial perspective why that proposal is unworkable. I would like to explain, from an operational perspective, the importance of per-call charges.

31. First, only approximately 4 of every 10 inmate call attempts results in an accepted, completed telephone call. Even if a call is prepaid, it is still required in the inmate phone industry that all inmate calls are positively accepted by the called party (by pressing the appropriate digit on the keypad). And unlike phone companies serving the general public, Securus can charge consumers **only** for accepted, completed telephone calls. But Securus's facilities are used for every call attempt.

32. Each inmate call attempt must pass through the validation process, requiring Securus to query not only the industry databases like the Line Information Database, but also its proprietary security system that houses the terminating phone numbers that can and cannot be called. Securus must also query whether the terminating phone number is one for which some kind of billing arrangement — LEC billing, direct collect call billing, or prepaid account — has been established. All of these hardware and software resources cost money, and Securus can recovery those costs only on accepted, completed calls. For this reason, allowing Securus to charge only \$0.25 or \$0.20 for each minute of conversation will not recover Securus's costs.

33. As I understand it, Petitioners' proposal assumes that every inmate call lasts 15 or 20 minutes. By their math, the carrier is guaranteed \$4.00 (debit) or \$5.00 (collect) for an interstate call. But inmate calls do not last 20 minutes, or even 15 minutes. Mr. Siwek's report shows that interstate, inmate-initiated calls last, on average, 7 to 13 minutes. That would pay Securus only \$1.40 to \$2.60 per call which is not nearly enough to cover costs.

34. I am aware that some parties have argued that per-call charges result in consumers being victimized by so-called "dropped calls". First, as Director of Regulatory and Government Affairs I have first-hand knowledge that inmate calls are not "dropped" without cause. Inmate calls are disconnected if the system detects that the inmate or the called party is attempting to

create a three-way call or to forward the call to some third party. It has been the very clear policy of correctional facilities for decades that inmates cannot have three-way calls and cannot have a call forwarded to some number other than the number that was dialed and validated. As the vendor, Securus is required to develop and install technology to detect and block this behavior.

35. Securus's patented technology for detecting this kind of unlawful activity is state of the art. It can "hear" three-way call and call forwarding attempts. To try to thwart this technology, inmates have developed ways to attempt to mask the sound of re-dialing the phone — they scream or blow into the handset, they bang the handset against the wall — to avoid disconnection. With Securus' advanced technology, this type of behavior is detected and — if required by the correctional authority — will result in call disconnection. In my experience, the overwhelming majority of allegations of unwarranted "dropped calls" are found to be false.

36. In addition, for years Securus has experienced the phenomenon of seeing multiple one-minute inmate calls to the same number. Inmates attempt to avoid billing altogether by having multiple phone calls, one after the other, in hopes that the billing system will not be activated by such short calls, or that they can falsely claim that the system cut off their calls. What some may interpret as a spate of "dropped" calls are really the result of the inmate's attempt to avoid paying for the service being used or an attempt to circumvent the system's security features.

37. I swear under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: March 22, 2013



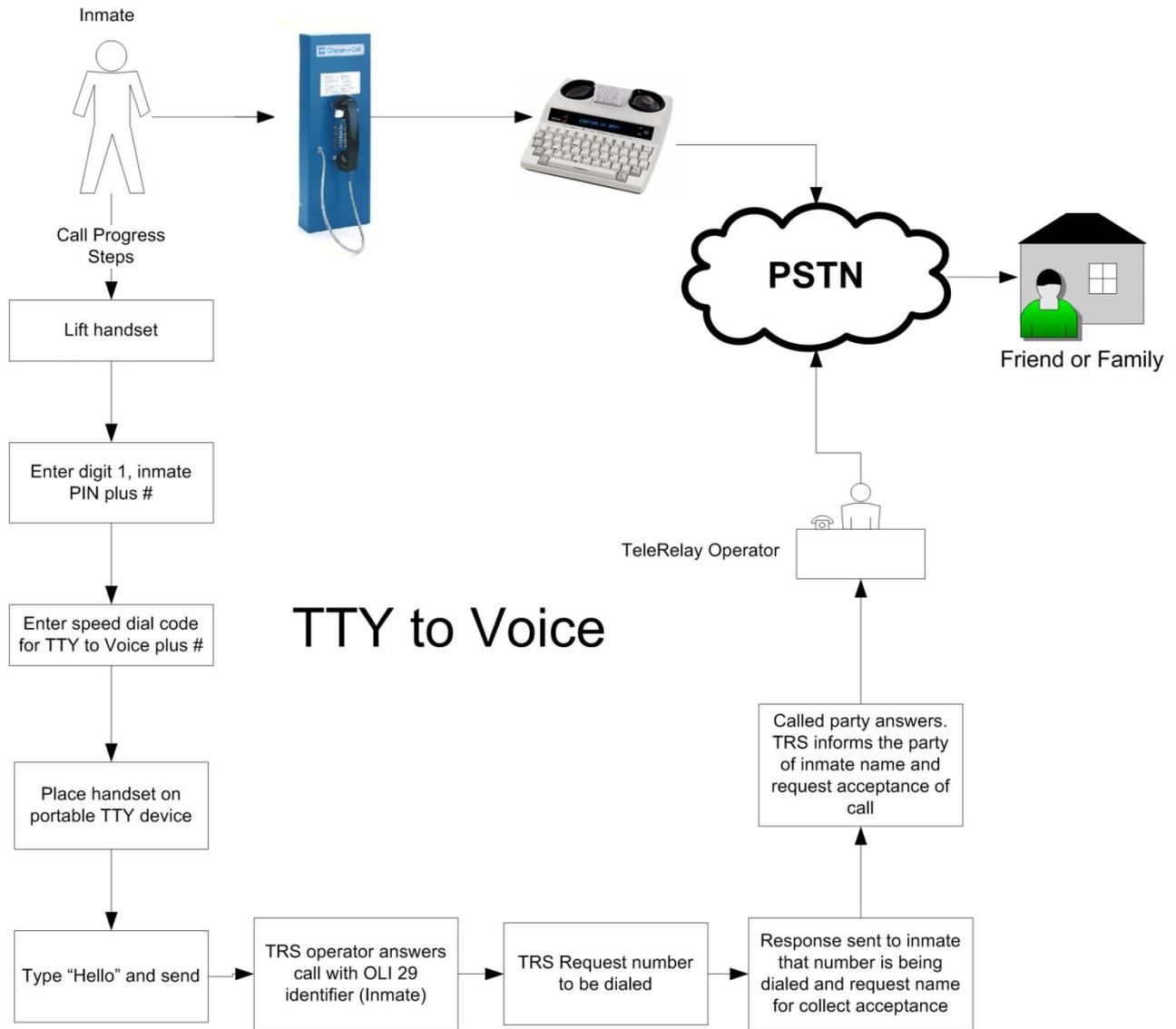
Curtis L. Hopfinger
Director – Regulatory and Government Affairs
Securus Technologies, Inc.

ATTACHMENT

1

Inmate Call Flow Using TTY to Voice

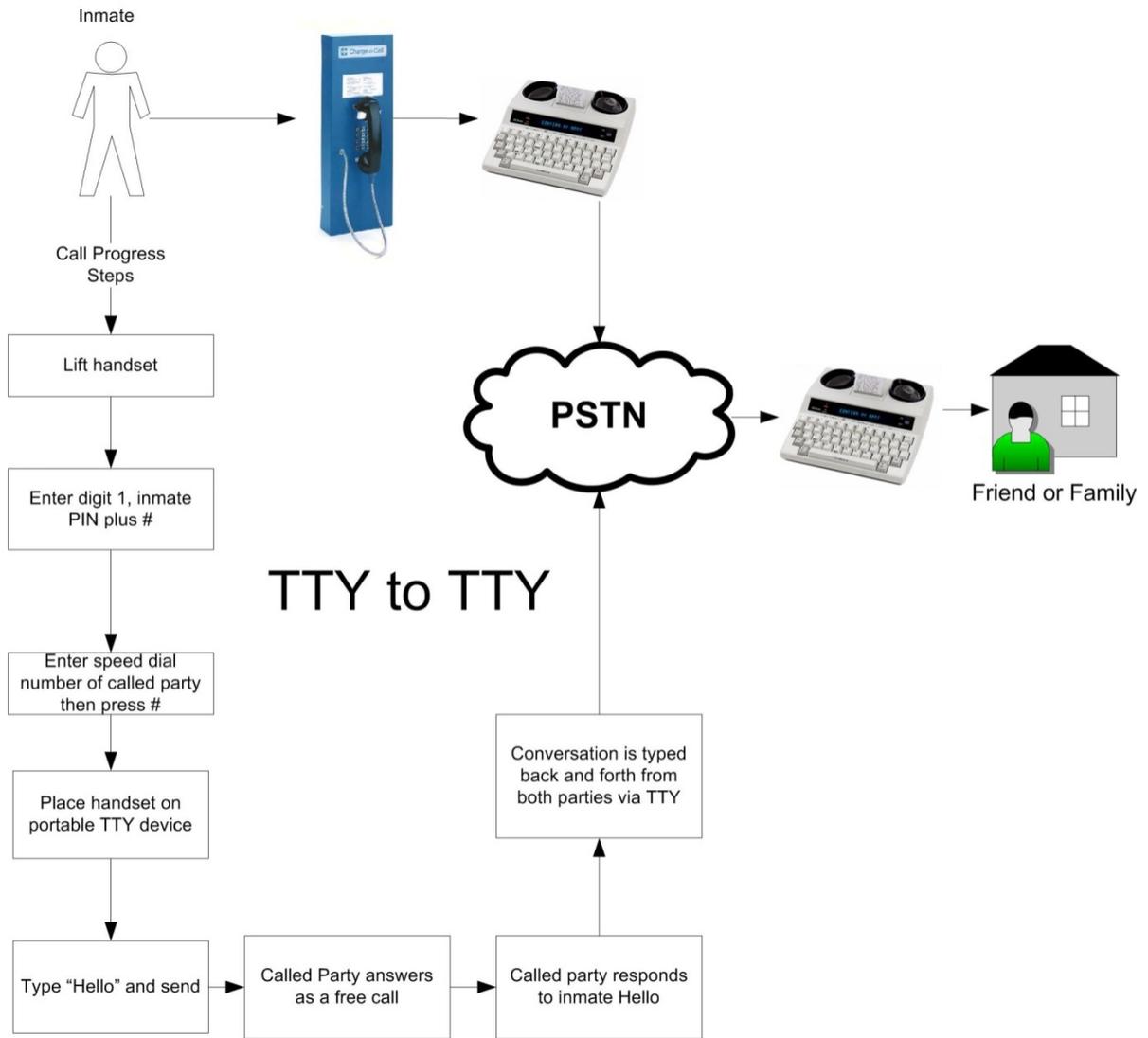
Proprietary and Confidential



ATTACHMENT

2

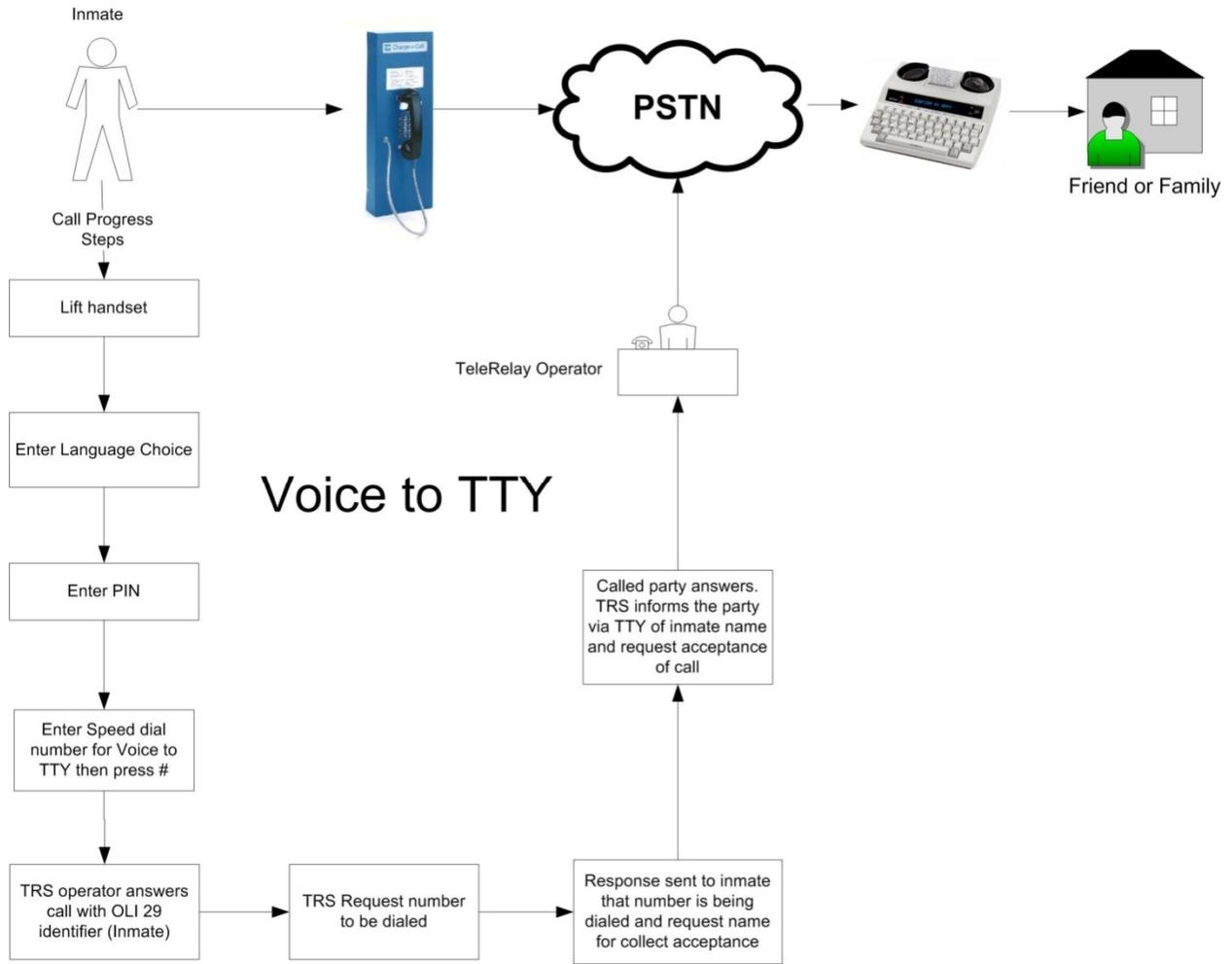
Inmate Call Flow Using TTY to TTY



ATTACHMENT

3

Inmate Call Flow Using Voice to TTY



ATTACHMENT

4

RATE TABLE

AT&T SPECIAL HANDLED CALLS USING OPERATOR ASSISTANCE

Effective Date

March 27, 2012

STATE-TO-STATE CALLS

The rates are stated below:

TYPE OF CALL	Usage Rate Per Min	SERVICE CHARGE PER CALL	
		Automated	Operator Assisted Includes Real Time Rated calls
COLLECT - Excluding Person-to-Person Placed via 1-800-CALLATT or 1-800-LLAMA-ATT	\$1.49	\$5.99	\$8.50
Operator Assisted Collect Calls and Collect calls placed via other than 1-800-CALLATT or 1-800-LLAMA-ATT	\$1.49	\$6.99	\$8.50

TYPE OF CALL	Usage Rate Per Min	SERVICE CHARGE PER CALL	
		Automated	Operator Assisted Includes Real Time Rated calls
BILLED-TO-THIRD NUMBER Excluding Person-to-Person	\$1.49	\$7.99	\$10.99

TYPE OF CALL		USAGE RATES PER MINUTE	SERVICE CHARGE PER CALL
PERSON-TO-PERSON Billed via Collect, Billed-to-Third Number or Operator Dialed Direct (Includes Real Time Rated Calls)	C	\$1.49	\$13.50

TYPE OF CALL	Usage Rates Per Min	SERVICE CHARGE PER CALL	
		Billed To Main Residential Account	
OPERATOR DIALED DIRECT (Sent Paid Non-Coin) Includes Real Time Rated Calls Billed To Main Residential Account	\$1.49	\$13.50	

Public Payphone Surcharge and Operator Transfer Fee may apply based on call circumstances.

A18. LONG DISTANCE MESSAGE TELECOMMUNICATIONS SERVICE

A18.3 Two-Point Service (Cont'd)

A18.3.1 Service Between Land Wire Telephones (Cont'd)

G. Rates for Hearing or Speech Impaired Persons or Users of the Florida Relay Center (Cont'd)

4. Applicable Discounts

- a. A qualified call made in the Peak rate period is rated at the Off-Peak rate specified in H.
- b. Calls through the Florida Relay Center will receive a 50 percent discount from the otherwise applicable rate except that where the calling or called party is both hearing and visually impaired, the call shall be discounted 60 percent off of the otherwise applicable rate.

H. Rates and Charges

Rates shown in the following tables are applicable to intraLATA intrastate messages between all points within the same LATA and within the State of Florida.

1. Basic Rate Table

	Rate Mileage	Initial Minute (or Fraction Thereof)	Each Additional Minute (or Fraction Thereof)	
a. Residence	0-10	\$.45	\$.45	(I)
	11-22	.45	.45	(I)
	23-55	.45	.45	(I)
	56-124	.45	.45	(I)
	125-292	.45	.45	(I)
b. Business	0-10	.90	.90	
	11-22	.90	.90	
	23-55	.90	.90	
	56-124	.90	.90	
	125-292	.90	.90	

A18. LONG DISTANCE MESSAGE TELECOMMUNICATIONS SERVICE

A18.3 Two-Point Service (Cont'd)

A18.3.1 Service Between Land Wire Telephones (Cont'd)

H. Rates and Charges (Cont'd)

2. Billing and Operator Surcharges

a. The following charges are in addition to the Basic Rate Table preceding when the call is placed using the following classes of service:

(1) Billing Surcharges for calls originating from other than payphone provider lines

	Charge Per Call	USOC
(a) Station-to-station Customer Dialed Calling Card (credit card)	\$ 1.00	NA
(b) Operator Station-to-Station ¹ (sent paid, collect or bill to third number) and operator dialed credit card calls	2.00	NA
(c) Person-to-Person	3.50	NA
(2) Billing Surcharges for calls originating from payphone provider lines		
(a) Station-to-station Customer Dialed Calling Card (credit card)	1.75	NA
(b) Operator Station-to-Station ¹ (sent paid, collect or bill to third number) and operator dialed credit card calls	1.75	NA
(c) Person-to-Person	3.25	NA
(3) Operator Dialed Surcharge ²		
(a) Operator Station-to-Station or Person-to-Person where the operator dials the terminating number (excluding those billed to calling cards)	1.25	NA

3. Discounts and Applicable Rate Periods

a. Discounts apply equally to the total charges for all messages with fractional amounts rounded down to the lower cent. Discounts do not apply to surcharges shown in 2. preceding.

(1) Residence

	Applicable Discounts						
	Mon.	Tues.	Wed.	Thur.	Fri.	Sat.	Sun.
7:00 AM to 6:00 PM ³	Full Rate	Full Rate	Full Rate	Full Rate	Full Rate	Full Rate	Full Rate
6:00 PM to 7:00 AM ³	Full Rate	Full Rate	Full Rate	Full Rate	Full Rate	Full Rate	Full Rate
Peak period = full rate							
Off-Peak period = full rate							

(2) Business

	Applicable Discounts						
	Mon.	Tues.	Wed.	Thur.	Fri.	Sat.	Sun.
7:00 AM to 7:00 PM ³	Full Rate	Full Rate	Full Rate	Full Rate	Full Rate	Full Rate	Full Rate
7:00 PM to 7:00 AM ³	Full Rate	Full Rate	Full Rate	Full Rate	Full Rate	Full Rate	Full Rate
Peak period = full rate							
Off-Peak period = full rate							

Note 1: Applies when the operator dials number for Directory Assistance at the customer's request.

Note 2: An Operator Dialed Surcharge is in addition to any applicable Billing Surcharge for calls originating from other than payphone provider lines.

Note 3: To, but not including.

BY DIRECTOR
 208 S. AKARD ST.
 DALLAS, TEXAS 75202
 ISSUED: OCTOBER 25, 2012

SECTION 3
 ORIGINAL SHEET 29

EFFECTIVE: NOVEMBER 1, 2012

LONG DISTANCE SERVICES

B. BASIC LONG DISTANCE (continued)

6. (continued)

i. Service Charges - Per InterLATA Call (continued)

	<u>Calling Card</u>	<u>Operator Assisted</u>
Person to Person*	\$6.06	\$6.06
	<u>Automated Calls</u>	<u>Operator Assisted Calls</u>
Operator Station*		
- Collect	\$3.37	\$ 5.05
- Billed to Third Party	3.37	5.05
- Sent Paid - Non Coin	NA	5.05
	<u>Charge per call</u>	
Verification	\$ 13.50	
Interrupt	\$ 27.00	
j. Non Subscriber Service Charge, per interLATA call		
Dial Station		\$3.50

* Includes Real Time Rated calls

MESSAGE TELECOMMUNICATIONS SERVICE

1.5 TWO-POINT SERVICE (continued)

1.5.6 Rates (continued)

B. Service Charges (continued)

For Card calls accessing AT&T's network other than via 1-800-CALLATT:

From non-payphone stations, billed to:

	AT&T CIID/891 Card	LEC Calling Card	Commercial Credit/Charge Card
1. Customer Dialed Calling Card Station (1)			
- Automated InterLATA	\$2.99	\$4.99	\$4.99
- Automated IntraLATA	\$2.99	\$4.99	\$4.99
- Operator Must Assist InterLATA	\$2.99	\$4.99	\$4.99
- Operator Must Assist IntraLATA	\$2.99	\$4.99	\$4.99
- Operator Assisted InterLATA	\$7.50	\$7.50	\$7.50
- Operator Assisted IntraLATA	\$7.50	\$7.50	\$7.50
2. Operator Dialed Calling Card Station (2,3)			
- InterLATA	\$7.50	\$7.50	\$7.50
- IntraLATA	\$7.50	\$7.50	\$7.50

From payphone stations, billed to:

	AT&T CIID/891 Cards	LEC Calling Cards	Commercial Credit/Charge Cards
1. Customer Dialed Calling Card Station (1)			
- Automated InterLATA	\$2.25	\$2.50	\$2.50
- Automated IntraLATA	\$2.25	\$2.50	\$2.50
- Operator Must Assist InterLATA	\$2.25	\$2.50	\$2.50
- Operator Must Assist IntraLATA	\$2.25	\$2.50	\$2.50
- Operator Assisted InterLATA	\$3.75	\$3.75	\$3.75
- Operator Assisted IntraLATA	\$3.75	\$3.75	\$3.75
2. Operator Dialed Calling Card Station (2)(3)			
- InterLATA	\$3.75	\$3.75	\$3.75
- IntraLATA	\$3.75	\$3.75	\$3.75

(1) Refer to Section 1.2.4.B, for descriptions of these categories.

(2) Refer to Section 1.2.4.C, for description of this category.

(3) Includes Real Time Rated Card Calls

AT&T Communications of Texas, LLC

Message Telecommunications Services Tariff

Issued: December 5, 2012

Effective: December 6, 2012

Section 1

Original Sheet 67

MESSAGE TELECOMMUNICATIONS SERVICE

1.5 TWO-POINT SERVICE (continued)

1.5.6 Rates (continued)

G. Rate Tables (continued)

1. (continued)

d. Operator Station - InterLATA

(1) Billed to Third Party, Collect and Sent Paid Non-Coin Calls, non-payphone stations

	Initial Period	Each Additional Period	Initial Period	Each Additional Period	Initial Period	Each Additional Period
All miles	\$1.49	\$1.49	\$1.49	\$1.49	\$1.49	\$1.49

(1) Billed to Third Party, Collect and Sent Paid Non-Coin Calls, payphone stations

RATE MILEAGE	DAY		EVENING		NIGHT/WEEKEND	
	Initial Period	Each Additional Period	Initial Period	Each Additional Period	Initial Period	Each Additional Period
1 - 17	\$.2975	\$.2625	\$.2975	\$.2625	\$.2975	\$.2625
18 - 22	\$.3150	\$.2975	\$.3150	\$.2975	\$.3150	\$.2975
23 - 28	\$.3325	\$.3150	\$.3325	\$.3150	\$.3325	\$.3150
29 - 34	\$.3325	\$.3150	\$.3325	\$.3150	\$.3325	\$.3150
35 - 41	\$.3325	\$.3150	\$.3325	\$.3150	\$.3325	\$.3150
42 - 51	\$.3325	\$.3150	\$.3325	\$.3150	\$.3325	\$.3150
52 - 66	\$.3325	\$.3150	\$.3325	\$.3150	\$.3325	\$.3150
67 - 81	\$.3675	\$.3500	\$.3675	\$.3500	\$.3675	\$.3500
82 - 105	\$.3675	\$.3500	\$.3675	\$.3500	\$.3675	\$.3500
106 - 124	\$.3675	\$.3500	\$.3675	\$.3500	\$.3675	\$.3500
125 - 292	\$.4025	\$.3850	\$.4025	\$.3850	\$.4025	\$.3850
293+	\$.4200	\$.4025	\$.4200	\$.4025	\$.4200	\$.4025

