Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of:	**)**	
	)	
	)	**WC Docket No. 12-375**
Rates For Interstate Inmate	**)**	
Calling Services	**)**	

OPPOSITION TO PETITION FOR STAY
OF REPORT AND ORDER PENDING APPEAL

Martha Wright, Dorothy Wade, Annette Wade, Ethel Peoples, Mattie Lucas, Laurie Nelson, Winston Bliss, Sheila Taylor, Gaffney & Schember, M. Elizabeth Kent, Katharine Goray, Ulandis Forte, Charles Wade, Earl Peoples, Darrell Nelson, Melvin Taylor, Jackie Lucas, Peter Bliss, David Hernandez, Lisa Hernandez, Vendella F. Oura, along with The D.C. Prisoners' Legal Services Project, Inc., Citizens United for Rehabilitation of Errants, the Prison Policy Initiative, and The Campaign for Prison Phone Justice (jointly, the "Petitioners") hereby submit this Opposition to the Petition Of Global Tel*Link For Stay Pending Judicial Review, filed by Global Tel*Link (the "Petition").[1]

The Petition requests that the FCC stay the effectiveness of the Report and Order, adopted on August 9, 2013, and released on September 26, 2013, in the above-captioned proceeding.[2] The Petition requests that the FCC delay implementing the rules adopted in the Petition "pending GTL's petition for review."[3] The Petition must be dismissed.

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[1] The Petition was filed on October 30, 2013. Pursuant to Section 1.45(d) of the FCC's rules, this Opposition is filed within 7 days of the submission. *See* 47 C.F.R. § 1.45(d) (2013).

[2] *Rates for Interstate Inmate Calling Services*, Report and Order and Further Notice of Proposed Rulemaking, FCC 13-113, rel. Sept. 26, 2013 (2013)(the "*R&O*"). As discussed in more detail *infra*, the FNPRM has yet to be published in the Federal Register.

[3] *Petition*, pg. 1.

First, the Petition is premature. As of the date of this Opposition, the R&O has yet to be published in the Federal Register. Thus, the rules that GTL seeks to stay have yet to become final, and the applicable window for submitting an appeal has yet to occur. Therefore, a request for FCC action by November 21, 2013 is premature.

Moreover, the Petition fails to satisfy the four-part test for granting a Petition for Stay.[4] First, the Petition is incorrect that an appeal is likely to be successful.[5] Instead, all parties to the proceeding were on notice that the FCC was considering the adoption of price caps, and the importance of reviewing actual cost data from the ICS providers was highlighted by repeated efforts by the FCC to obtain this information.[6] In fact, these specific issues were the subject of numerous studies by the parties in the proceeding since at least 2007. Thus, it is simply not correct that ICS providers had no notice that the FCC would adopt rules imposing price caps on ICS interstate rates, or that the FCC would look at the cost of providing the service as a baseline for determine the parameters of a just and reasonable rate.

Additionally, GTL is incorrect in arguing that the R&O imposes "rate-of-return regulation, plain and simple."[7] While GTL repeatedly cites Commissioner Pai's dissent for support of this position, Commission Pai limited his description of new rules to *de facto* or *essentially* or *granular* rate-of-return regulation.[8] Therefore, not even Commissioner Pai went as far as GTL argues in the Petition.

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[4] *See Virginia Petroleum Jobbers Association*, 259 F.2d 921 (D.C. Cir. 1958). The four-part test requires that a petitioner show (1) it is likely to prevail on the merits; (2) it will suffer irreparable harm absent the grant of preliminary relief; (3) other interested parties will not be harmed if the stay is granted: and (4) the public interest would favor grant of the stay.

[5] *Petition*, at 6.

[6] *Petitioners Reply Comments*, pg. 8 (listing specific requests for data in Notice of Proposed Rulemaking). *See also R&O*, ¶ 59, nt. 222.

[7] *Petition*, at 11.

[8] In fact, Commissioner Pai uses the limiting word "*de facto*" six times in his dissent to the R&O.

Instead, GTL attempts to construct a straw-man argument, labeling the rules adopted in the R&O as "rate-of-return", and then argues that the FCC did not mention GTL's straw man in the NPRM, although GTL admits that the NPRM alerted the public that "the Commission might implement one of its proposals using cost data supplied by ICS providers or other parties."[9] GTL's Petition piles on arguments against the adoption of rate-of-return regulation, arguing that it creates "perverse incentives",[10] that it was long disfavored,[11] and then argues that the FCC did not provide sufficient guidance.[12]

To the extent that GTL takes the FCC to task for not providing advance notice of the rules, it is necessary to remember that ICS providers such as GTL flatly refused to actively participate in the FCC's rulemaking, and, in fact, refused to provide the very cost data that it now argues the FCC should have explored before adopting the rules.[13] For example, GTL stated in its Comments that it would not provide updated cost data, but chastised others for providing "stale" information.[14] GTL did not discuss its failure to supply the requested cost data in its Reply Comments, and submitted additional Comments on July 17. 2013, which flatly refused to supply cost data, arguing only that "ICS rates and fees cannot be reviewed in isolation."[15]

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[9] *Petition*, at 11.

[10] *Id.*, at 14. Of course, one must wonder what is more perverse than the current ICS regime whereby ICS providers promise to share a sizable portion of their revenue in order to obtain site-based monopolies with little or no oversight by the contracting party.

[11] *Id.*, at 17.

[12] *Id.*, at 19.

[13] *Id.*

[14] *Comments of GTL*, WC Docket 12-375, at pg. 26-27 (filed March 25, 2013).

[15] *Comments of GTL*, WC Docket 12-375, at pg. 6 (filed July 17, 2013)(submitted in response to public notice seeking ICS cost data, *More Data Sought on Extra Fees Levied on Inmate Calling Services*, Public Notice, DA 13-1445 (rel. June 26, 2013)).

Thus, GTL has failed to establish that it will be successful on the merits of its appeal of the R&O. GTL's lack of notice argument is irrelevant, since the FCC did not adopt rate-of-return or a one-size-fits-all approach to ICS regulation. Instead, the FCC adopted a two-tier regulatory structure that is intend to take into account high-cost prisons and jails, and requires only that the ICS providers prove that their costs are above the safe-harbor rates if the ICS provider intends to charge a higher rate.

The Petition also failed to provide evidence that GTL will suffer irreparable harm. First, the Petition lacked sufficient evidence that any existing ICS contracts are in danger of not being reformed to take into consideration the new price caps, or that it will suffer a loss of good will.[16] Second, the Petition argues that R&O's data collection requirements will result in irreparable harm.[17] However, it is inconceivable that the ICS providers are incapable of immediately preparing reports that "record and document its costs of providing service." Simply put, other than a three-page affidavit, GTL failed to provide any concrete evidence that irreparable harm will occur absent the grant of the Petition.[18]

Finally, GTL is wrong in concluding that third parties will not be harmed by the grant of the Petition.[19] The record in this proceeding overwhelming demonstrates the significant and adverse effects caused the unjust, unreasonable and unfair rates and fees charged by the ICS providers on a daily basis. If the Petition is granted, third parties (i.e., the customers) will

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16 *Petition*, at 20.

17 *Id.*, at 21.

18 *See Connect America Fund*, 27 FCC Rcd 7158, 7160 (2012)("To warrant injunctive relief, an injury must be 'both certain and great; it must be actual and not theoretical. Petitioners must provide 'proof indicating that the [they allege] is certain to occur in the near future.'"). *See also Wisconsin Gas Co. v. FERC*, 758 F.2d 669, 674 (D.C. Cir. 1985) ("Bare allegations of what is likely to occur" are not sufficient.").

19 *Petition*, at 22.

continue to pay up excessive fees while an appeal is being briefed and argued before a court. Moreover, since proceedings in the states are being asked to be held in abeyance while the FCC resolves this matter, there is no certainty that state regulators will be able to step in and provide relief if the Petition is granted.[20] As such, the illogical argument that third parties will not be harmed by the grant of the Petition must be disregarded.

Instead, this proceeding demonstrated the overwhelmingly positive public interest benefits from the adoption of the R&O, and that any delay in the effectiveness of the R&O would be, in fact, be counter to the public interest. As discussed above, a delay in the effectiveness of the R&O would delay immediate relief to millions of ICS customers. It was shown in this proceeding that increased contact between inmates and their families and loved ones will reduce recidivism rates, which will decrease the cost of incarceration. In fact, it was shown that just a 1% decrease in the recidivism rate would result in savings of more than 250 million dollars for state, county and local jurisdictions.[21]

Moreover, the Petitioners provided statements from the ICS providers in response to a Request for Proposal asserting that the reduction in rates would lead to increased call volume, increased revenues for ICS providers, and, in turn, increased commissions paid to the correctional facilities that receive commissions.[22] Thus, it is inconceivable that the same parties that advocated low ICS rates to drive up revenue and commissions paid to the correctional authorities would now argue that low ICS rates will cause irreparable damage and not serve the public interest. In the absence of any support for these arguments, the FCC must find that the

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[20] *See Exhibit A.*

[21] *Petitioners Comments*, pg. 36 (*citing* Declaration of Coleman Bazelon, Ph.D).

[22] *Petitioners' Ex Parte Submission*, dated July 18, 2013 (attached hereto as Exhibit B).

Petition failed to establish a public interest benefit for delaying the effectiveness of the lower rates.

Thus, the prematurely-filed Petition (i) failed to establish that an appeal of the Report and Order would be successful on the merits; (ii) failed to provide any solid evidence that ICS providers will suffer irreparable harm; (iii) failed to show the lack of harm to third parties (in fact, great harm be caused from a delay in the effectiveness of the lower ICS rates); and (iv) failed to show any public interest benefit from granting a stay. The only support for any of the allegations was a three-page affidavit that lacked sufficient evidence to satisfy the *Virginia Jobbers* standard.

Therefore, the Petition for Stay must be denied. Further delay of this proceeding, after more than decade of waiting for the FCC to act on the Wright Petition, will only serve to perpetuate the great harm caused to millions of incarcerated persons and their families. Thus, Petitioners oppose the Petition for Stay, and respectfully request that the FCC deny the request as both premature, and legally unsustainable.

Respectfully submitted,

By:/s/ Deborah M. Golden, Esq._____

Deborah M. Golden, Esquire

D.C. PRISONERS' PROJECT
WASHINGTON LAWYERS' COMMITTEE
FOR CIVIL RIGHTS AND URBAN AFFAIRS
11 Dupont Circle, NW, Suite 400
Washington, DC 20036
Telephone 202-319-1000
Fax 202-319-1010

Counsel to the Petitioners

November 6, 2013

EXHIBIT A

Before the
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Petition of Recipients of Collect Calls from	**)**	
Prisoners at Correctional Institutions in	**)**	**D.T.C. 11-16**
Massachusetts Seeking Relief from the	**)**	
Unjust and Unreasonable Cost of such Calls	**)**	

MOTION TO HOLD PROCEEDING IN ABEYANCE

Global Tel*Link Corporation ("GTL"), by its attorneys and pursuant to 220 C.M.R. § 1.04(5), respectfully moves the Massachusetts Department of Telecommunications and Cable ("Department") to hold this proceeding in abeyance pending resolution of similar matters before the Federal Communications Commission ("FCC"). Specifically, GTL requests that the Department stay the current filing deadlines and any further action on the appeal filed by Petitioners as well as any further action on the Department's planned investigation.[1] In support of this Motion, GTL states:

1. On August 31, 2009, Prisoners' Legal Services of Massachusetts ("PLS") and several "family members, loved ones, legal counsel, and others residing in Massachusetts who receive and pay for telephone calls from prisoners" (collectively, "Petitioners") filed a petition seeking relief from what they claim are unjust and unreasonable rates for inmate calling service ("ICS") in Massachusetts ("Petition"). Petitioners amended their Petition on May 18, 2010 and again on April 27, 2011. GTL and Securus Technologies, Inc. ("Securus") (collectively, "Respondents") requested that the Department dismiss the Petition.

2. On September 23, 2013, the Hearing Officer issued an Interlocutory Ruling[2]

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[1] Pursuant to the Hearing Officer's October 16, 2013 ruling, responses to the appeal are now due by October 28, 2013. To date, no filing deadlines or other timelines have been established for the Department's investigation.

[2] D.T.C. 11-16, *Petition of Recipients of Collect Calls from Prisoners at Correctional Institutions in Massachusetts Seeking Relief from the Unjust and Unreasonable Cost of such Calls*, Hearing Officer Interlocutory Ruling (Sept. 23, 2013) ("*Interlocutory Ruling*").

opening an investigation into: the per-call surcharge assessed by ICS providers; the tariffed service and other fees assessed by ICS providers; the telephone service quality provided by Respondents, including the frequency of dropped calls and line noise; and Respondents' billing practices. The Interlocutory Ruling dismissed Petitioners' request to investigate: the usage rate component of the ICS rate-setting mechanism; the frequency and content of recorded warning messages; and the availability and upkeep of telecommunications equipment at correctional facilities.

3. On September 26, 2013, the FCC issued a Report and Order and Further Notice of Proposed Rulemaking ("FNPRM") in its ongoing proceeding to review the reasonableness of current ICS rates and the steps needed to ensure reasonable ICS rates going forward.[3] The decision was the result of the FCC's 2002 request for comments on ICS rates, commissions, cost and revenue data, and proposed methods to lower ICS rates, as well as a 2003 petition filed by families of inmates asking the FCC to establish nationwide rate caps for ICS.[4]

4. The Report and Order establishes interim rate caps and safe harbors for interstate ICS rates and requires a mandatory data collection from ICS providers. The new rules adopted by the Report and Order will be effective 90 days after the Report and Order is published in the Federal Register.

5. The FNPRM seeks additional data to allow the FCC to establish further and permanent reforms for interstate ICS rates, as well as reforms for intrastate ICS rates. The FCC finds in the FNPRM that "intrastate reform is necessary" and the FCC "has the authority to

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[3] WC Docket No. 12-375, *Rates for Interstate Inmate Calling Services*, Report and Order and Further Notice of Proposed Rulemaking, FCC 13-113 (rel. Sept. 26, 2013) ("*Order and FNPRM*").

[4] *Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*, 17 FCC Rcd 3248 (2002); CC Docket No. 96-128, Petition for Rulemaking or, in the Alternative, Petition to Address Referral Issues in a Pending Rulemaking, at 3 (filed Nov. 3, 2003); CC Docket No. 96-128, Petitioners' Alternative Rulemaking Proposal Regarding Issues Related to Inmate Calling Services (filed Mar. 1, 2007).

reform intrastate ICS rates."[5] In addition to addressing intrastate ICS rates, the FNPRM seeks information on the adoption of unified interstate and intrastate ICS rates, ancillary charges, quality of service issues, and billing issues. Comments on the FNPRM are due 30 days and 45 days after the FNPRM is published in the Federal Register.

6. PLS was a participant in the FCC's proceeding. It argued that FCC action was needed to "provide national leadership for state regulatory agencies in Massachusetts," "to encourage states that have not yet acted, such as Massachusetts," and to "establish guidance as our state regulatory agency evaluates intrastate rates."[6] PLS requested that the FCC take action on many of the same issues PLS has raised before the Department. In prior filings to the Department and the FCC, PLS has emphasized that the FCC's ultimate actions regarding ICS rates and services are important and influential to the Department's review of these same issues.[7]

7. Petitioners' recent appeal further supports holding this proceeding in abeyance pending action by the FCC.[8] Petitioners' appeal is based on data submitted as part of the FCC's ongoing ICS rates proceeding, and they urge the Department to follow the lead of the FCC. They note that the FCC is considering adopting a "flat, distance-insensitive ICS rate"[9] and rely on the FCC's *proposed* action to support their position in this proceeding that the per-minute ICS

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[5] *Order and FNPRM* ¶ 129.

[6] WC Docket No. 12-375, Comments of Prisoners Legal Services of Massachusetts, 1, 12, 19 (filed Mar. 25, 2013) ("PLS FCC Comments").

[7] *See generally* PLS FCC Comments; *see also* D.T.C. 11-16, *Petition of Recipients of Collect Calls from Prisoners at Correctional Institutions in Massachusetts Seeking Relief from the Unjust and Unreasonable Cost of such Calls*, Letter from Counsel for Petitioners (filed Apr. 26, 2013) (noting the "relevant findings" in the FCC's ICS proceeding).

[8] D.T.C. 11-16, , *Petition of Recipients of Collect Calls from Prisoners at Correctional Institutions in Massachusetts Seeking Relief from the Unjust and Unreasonable Cost of such Calls*, Petitioners' Appeal (filed Oct. 16, 2013) ("Petitioners' Appeal").

[9] Petitioners' Appeal at 1.

rates for Massachusetts should be revised.[10] At the same time, the Petitioners concede that the FCC is continuing to collect data in order to develop a permanent rate structure,[11] but ask Department to rely on the FCC's analysis, which is still being formulated in the FNPRM.[12] Thus, Petitioners' recent appeal filing further demonstrates the interplay between the FCC's ongoing ICS proceeding and the issues set for investigation here.

8. The Department, therefore, should hold the instant proceeding in abeyance, including any filing deadlines or action associated with Petitioners' appeal, pending the outcome of the FCC's ongoing review of ICS rates. The issues set for review in the FCC's FNPRM are the same issues raised by Petitioners and set for investigation by the Department in the *Interlocutory Ruling*.

9. As the Hearing Officer recognized in the *Interlocutory Ruling*, the Department previously has "stayed proceedings pending the outcome of FCC proceedings when it would be unreasonably onerous for the Department to issue a decision without preceding action by the" FCC.[13] In this case, the Department runs the risk of adopting rules governing ICS that subsequently may be deemed inconsistent with the FCC's determinations, which would require the Department to conduct additional proceedings. This type of "administrative inefficiency would not benefit the Department, the parties, or the public interest."[14]

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[10] Petitioners' Appeal at 4-5.

[11] Petitioners' Appeal at 7.

[12] Petitioners' Appeal at 8.

[13] *Interlocutory Ruling* at 13 (citing D.T.E. 01-20, *Investigation by the Dep't of Telecomms. & Energy on its own Motion into the Appropriate Pricing, based upon Total Element Long-Run Incremental Costs, for Unbundled Network Elements & Combinations of Unbundled Network Elements, & the Appropriate Avoided Cost Discount for Verizon New England, Inc. d/b/a Verizon Mass. Resale Servs. in the Commw. of Mass.*, Interlocutory Order on Part B Motions (Apr. 4, 2001) ("*01-20 Interlocutory Order*")).

[14] *01-20 Interlocutory Order* at 8.

10. In addition, while the FCC's Report and Order provides some indication of the "general approach contemplated by the FCC," the Department cannot be sure that the FCC will not "alter that approach in its to-be-issued rules" or as the result of court proceedings in response to the Report and Order.[15] The Department previously has stayed proceedings in light of possible action by the FCC or the courts that would affect the proceeding, and has let those "[e]vents . . . inform [its] course of action."[16] It should do so here.

Accordingly, GTL respectfully moves the Department to hold the instant proceeding, including the current filing deadlines and any further action on Petitioners' appeal, in abeyance pending the outcome of the FCC's ongoing review of ICS rates.

Respectfully submitted,

GLOBAL TEL*LINK CORPORATION

/s/ Chérie R. Kiser

Dated: October 17, 2013

Chérie R. Kiser
Angela F. Collins
CAHILL GORDON & REINDEL LLP
1990 K Street, N.W., Suite 950
Washington, DC 20006
202-862-8900 (telephone)
ckiser@cahill.com
acollins@cahill.com

Its Attorneys

[15] *01-20 Interlocutory Order* at 8.

[16] D.T.E. 03-60, *Proceeding by the Dep't of Telecomms. and Energy on its own Motion to Implement the Requirements of the Federal Comms. Comm'n Triennial Review Order Regarding Switching for Mass Market Customers*, Interlocutory Order on Motion to Stay of Verizon New England, Inc. d/b/a Verizon Massachusetts, 15, 17 (Apr. 4, 2004).

CERTIFICATE OF SERVICE

I, Angela F. Collins, certify that on this 17th day of October 2013, I served a copy of the foregoing Motion to Hold Proceeding in Abeyance on the following via the method indicated:

Catrice C. Williams, Secretary
Department of Telecommunications and Cable
1000 Washington Street, 8th Floor, Suite 820
Boston MA 02118-6500
Email: catrice.williams@state.ma.us
Email: efiling.dtc@state.ma.us
Via Federal Express and Electronic Mail

Kalun Lee
Hearing Officer
Department of Telecommunications and Cable
1000 Washington Street, 8th Floor, Suite 820
Boston MA 02118-6500
Email: kalun.lee@state.ma.us
Via Electronic Mail

Betsy Whittey
Hearing Officer
Department of Telecommunications and Cable
1000 Washington Street, 8th Floor, Suite 820
Boston MA 02118-6500
Email: betsy.whittey@state.ma.us
Via Electronic Mail

Paul Abbott
General Counsel
Department of Telecommunications and Cable
1000 Washington Street, 8th Floor, Suite 820
Boston MA 02118-6500
Email: paul.abbott@state.ma.us
Via Electronic Mail

Karlen Reed
Director, Competition Division
Department of Telecommunications and Cable
1000 Washington Street, 8th Floor, Suite 820
Boston MA 02118-6500
Email: karlen.reed@state.ma.us
Via Electronic Mail

CERTIFICATE OF SERVICE

Ben Dobbs
Deputy Director, Competition Division
Department of Telecommunications and Cable
1000 Washington Street, 8th Floor, Suite 820
Boston MA 02118-6500
Email: benedict.dobbs@state.ma.us
Via Electronic Mail

Joseph Tiernan
Competition Division
Department of Telecommunications and Cable
1000 Washington Street, 8th Floor, Suite 820
Boston MA 02118-6500
Email: joseph.tiernan@state.ma.us
Via Electronic Mail

James Pingeon, Esq.
Leslie Walker, Esq.
Bonita Tenneriello, Esq.
Lizz Matos, Esq.
Prisoners' Legal Services, Inc.
10 Winthrop Square, 3rd Floor
Boston, MA 02110
Email: jpingeon@plsma.org
Email: lwalker@plsma.org
Email: btenneriello@plsma.org
Email: lmatos@plsma.org
Via Electronic Mail

Patricia Garin, Esq.
Stern, Shapiro, Weisberg & Garin
90 Canal St., 5th Floor
Boston, MA 02114
Email: pgarin@sswg.com
Via Electronic Mail

Curtis Hopfinger
Director, Government and Regulatory Affairs
Securus Technologies, Inc.
14651 Dallas Parkway, 6th Floor
Dallas, Texas 75254
chopfinger@securustech.net
Via Electronic Mail

CERTIFICATE OF SERVICE

Paul C. Besozzi
Counsel for Securus Technologies, Inc.
Patton Boggs LLP
2550 M Street NW
Washington D.C. 20037
Email: pbesozzi@pattonboggs.com
Via Electronic Mail

Ken Dawson
VP Contracts & Regulatory
Inmate Calling Solutions, LLC d/b/a ICSolutions
2200 Danbury Street
San Antonio, TX 78217
Email: kdawson@icsolutions.com
Via Electronic Mail

/s/ Angela F. Collins

Angela F. Collins

EXHIBIT B

DrinkerBiddle&Reath LLP

Lee G. Petro
202-230-5857 Direct
202-842-8465 Fax
Lee.Petro@dbr.com

Law Offices

1500 K Street N. W.
Suite 1100
Washington, D.C.
20005-1209

(202) 842-8800
(202) 842-8465 fax
www.drinkerbiddle.com

CALIFORNIA
DELAWARE
ILLINOIS
NEW JERSEY
NEW YORK
PENNSYLVANIA
WASHINGTON D.C.
WISCONSIN

July 18, 2013

By ECFS
Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: *Rates for Interstate Inmate Calling Services*
WC Docket No. 12-375

Dear Ms. Dortch:

This submission, filed on behalf of Martha Wright, et al. (the "Petitioners") responds to the June 26, 2013 Public Notice requesting additional information regarding inmate calling service (ICS) contracts between ICS providers and correctional authorities.[1] Previously, the Petitioners have submitted excerpts from contracts into the record of this proceeding to demonstrate that the ICS rates charged to inmates and their families are far in excess of the "just and reasonable" rates required under Section 201 of the Communications Act.

In the Comments submitted by Global Tel*Link Corporation ("GTL") on March 25, 2013, reference was made to the negotiation of a new ICS contract for the Florida Department of Corrections. The Petitioners submitted a request under the Freedom of Information Act, and received copies of the materials directly from the purchasing authorities, so it is assumed that the information is accurate.

While the executed contract was not available, the Petitioners were able to obtain the Intent to Negotiate and the responses from CenturyLink, GTL, and Securus Technologies. We were also able to obtain the Best and Final Offers from these three parties, and they are attached as Exhibits A-D.

As reflected therein, the Florida DOC staff recommended that the contract be awarded to CenturyLink. Noting that Department's commission rate would increase by approximately 27%, the staff also stated that the cost of a 15-minute call would be reduced by 25%, which "should lead to increased communication between inmates and their family and friends which will ultimate help support the Department's Re-Entry Initiatives."[2]

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[1] *Data On Service Contracts Included In Record Of Inmate Calling Service Rates Proceeding*, Public Notice, DA 13-1446 (rel. June 26, 2013).

[2] *Recommendation of Award*, Memorandum, dated June 24, 2013.

In its successful Best and Final Offer, CenturyLink advocated its proposal for a 15-minute blended rate of $0.099 and a commission rate of 62.6%, also noting that it would not include a per-call surcharge.[3] Instead, CenturyLink asserted that the lower phone rate, with no surcharge, would result in inmates "make[ing] more frequent calls and connections ...[which]...has the added benefit of providing more overall commission revenue."[4]

In Securus' BAFO, it proposed a 15-minute blended rate of $o.095 and a commission rate of 46%, stating that Florida DOC's "requirement for both low rates and high commissions" will lead to a "thirty percent (30%) increase in inmate calling."[5] Securus made this assertion "based upon our experience with similar rate reductions."

Finally, GTL agreed with the other two bidders that the lower rates would lead to higher call volume, stating that the increased call volume resulting from their proposal would lead to a growth in the commission paid to Florida of "85% more than you are being paid under the current contract," even though GTL's proposal "represents a 24% discount" as compared to the current rate, and a 41% increase in the annual commission.[6]

Thus, the recent statements of CenturyLink, GTL and Securus demonstrate that a lower ICS rate will lead to higher call volumes, and a commission of 50% or more can still be paid to the correctional authority. Each tout their low rate/high commission rate proposals as delivering higher call volumes and higher revenues for the Florida DOC. Their blended 15-minute rate was less than $0.10 per minute, and each proposed to pay an annual commission in excess of 46%.

They did so, despite the fact that Securus proposed to throw in a prescription plan for inmates and Department employees, and various other security services for free. GTL volunteered to pay an additional $100,000 per year for a "Technology Fund", along with a cell phone detection system, an inmate voicemail system, and a voice biometric system, again, at no additional cost. Finally, CenturyLink offered up 10 additional "value-added functionality" programs at no additional charge.

These responses should put to rest any possible argument that adoption of a benchmark ICS rate will eviscerate the ability of ICS providers to deliver ICS telephone service, and undermine the positions taken by the various jail and sheriff organizations which have posited that a low ICS rate will cause widespread security issues.

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[3] Embarq Payphone Services, Inc. *dba* CenturyLink Best and Final Offer, dated June 18, 2013, pgs 2-3.

[4] *Id.*, pg. 3.

[5] *Letter of Robert E. Pickens, Chief Operating Officer, Securus Technologies*, dated June 18, 2013.

[6] Global Tel*Link Corporation Best and Final Offer, dated June 18, 2013, pg. 2.

Simply put, if these companies are willing to accept a requirement that their rate for a 15-minute call must not exceed $2.10, and each of the involved parties cite to the low rate as an incentive for higher call volumes and higher commissions to be paid to the correctional facilities, and each company is still able to throw in a variety of "value-added services" for free (e.g., a no-cost prescription plan!), there can be no further debate that the Petitioners' proposal should be rejected. In their own words, three of the top ICS providers have supported the arguments made by the Petitioners for the past 10 years, and the FCC must take these statements by the ICS providers to heart when reaching a decision on the Petitioners' proposal.

There are two other points raised from reviewing these BAFO's that require discussion, namely the advocacy for debit calling, and the length of the contract in question.[7] In their BAFOs, both Securus and GTL discuss the benefits of debit calling. Securus advocates the use of ICS debit service, stating:

> This new calling method will result in increased call volume and additional commission dollars. DOCs across the country have implemented inmate debit and have found that the increased call volume has resulted in more friends and family communication between inmates and outside parties.[8]

In addition, GTL states that:

> A large DOC with nearly 50,000 inmates experienced a doubling of call volumes since the implementation of an integrated debit calling option, which generated additional commissionable revenue while providing inmates another option for communication at affordable rates.
>
> Roughly half of all telephone numbers in the United States, including almost all cell phone numbers, are restricted from receiving traditional collect calls. Prepaid calling options including debit calling overcome this limitation; enabling the completion of many more, otherwise approved, inmate calls. Debit calls are subject to the same ITS call restrictions and security functions as collect calls.

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[7] Another point is the willingness of the ICS providers to highlight and advocate new and innovative ways to charge inmates and their families. ("This new service can provide the Department with additional revenues through new commissions as well as positively contribute to the Department goal of reducing recidivism." Securus BAFO, pg. 8) ("Services such as inmate phones, commissary, and inmate deposits have helped to defray costs, but until now, there has not been an effective system to generate revenue from inmate visitation. GTL's VVS Solution can optionally generate revenue, for example, by charging for *additional visits*." GTL BAFO, pg. 6 (emphasis in original)).

[8] *Securus BAFO*, pg. 23.

> When GTL implements fully integrated debit the result is usually a substantial increase in call volumes and commission revenues for the facility.[9]

These statements offer further support for the adoption of an ICS debit calling option, and also provide additional evidence of the ICS providers' experience that debit calling is both affordable, and can be offered in accordance with all security needs.

Finally, with respect to the contract-length question, the Petitioners have proposed a "fresh look" period for existing contracts to come into compliance with the proposed benchmark ICS rate. The ICS providers have opposed this proposal, with one stating that the average length of contract is four to five years.[10] However, as noted in the BAFO's, the Florida DOC contract is to run for a period of ten years.

This is a prime example of why the FCC must adopt a "fresh look" period. It is inconceivable that the FCC could permit a 10-year agreement to run, while new agreements are required to comply with the proposed benchmark ICS rate. The disparity in the application of the new rule would be ripe for abuse, as every current party to a contract took steps to extend, renew, restate, or use some other mechanism to perpetuate high ICS rates and ancillary fees. Therefore, the FCC must adopt a fresh look period when adopting the proposed benchmark rate.

Should there be any questions regarding this submission, please contact undersigned counsel.

Respectfully submitted,

Lee G. Petro
DRINKER BIDDLE & REATH LLP
1500 K Street N.W., Suite 1100
Washington, DC 20005-1209
202-230-5857 – Telephone
202-842-8465 - Telecopier

Counsel for Martha Wright, et al.

Attachments

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9 *GTL BAFO*, pgs. 20-21.

10 *Comments of Securus Technologies*, pg. 8.

EXHIBIT A

MEMORANDUM

Date: June 24, 2013
To: Michael Crews, Secretary
From: Negotiation Team – ITN #12-DC-8396,
Statewide Inmate Telephone Services
Shane Phillips, Bureau of Contract Management and Monitoring
Randy Agerton, Bureau of Security Operations
Steve Wilson, Office of the Inspector General
Through: Julyn Hussey, Procurement Manager, Bureau of Procurement & Supply
Subject: Recommendation of Award

In accordance with s. 287.057 (1) (c) 5., the Department's Negotiation Team hereby provides its recommendation of award to Embarq Payphone Services, Inc. dba CenturyLink for ITN # 12-DC-8396 Statewide Inmate Telephone Services.

History: The Department released the Invitation to Negotiate (ITN) in April 2013 and opened on May 21, 2013. The Department evaluated the responses against evaluation criteria and conducted negotiations with three (3) companies: Global Tel*Link Corporation, Securus Technologies, Inc. and Embarq Payphone Services, Inc. dba CenturyLink. Subsequent to negotiations, the Department issued its Request for Best and Final Offers (BAFO) and each vendor was provided an opportunity to respond with their BAFO to the Department.

Basis of Selection: While each vendor's BAFO demonstrated the ability to provide the required services as set forth in the ITN, it has been determined that Embarq Payphone Services, Inc. dba Century Link demonstrates the best value and to be the most advantageous to the Department due to the following proposed deliverables.

- A complete turn-key inmate telephone system that provides the Department with enhanced communication, security and forensic investigation options allowing the department to conduct detailed analysis of external and internal calling data.
- A system that will deploy call processing, storage and network which will be 100% dedicated to the Department.
- A pricing structure that increases the department's commission rate by approximately 27% while lowering the cost of a 15 minute collect phone call to inmate family and friends by approximately 25%. The lower cost per call should lead to increased communication between inmates and their family and friends which will ultimately help support the Department's Re-Entry Initiatives.
- Additional negotiated services reflected in the department's recommendation include:
  - Free Calls
  - Forensic Options
  - Investigative Function
  - Cell Phone Detection
  - Interactive Voice Response (IVR) Scheduling
  - Inmate Voice Mail
  - Ability to search by keyword
  - Capability to capture inmate to inmate telephone communications
- A 5-Site video visitation pilot with the ability to implement statewide at the Department's discretion

For these reasons, the negotiation team would like to award the contract to Embarq Payphone Services, Inc. dba CenturyLink.

cc: Mike Dew, Chief of Staff
Jodi Bailey, Director of Procurement & Contract Management
Rosalyn Ingram, Chief, Bureau of Procurement & Supply

Approve

Disapprove

EXHIBIT B

5454 W. 110th Street, 3rd Floor
Overland Park, KS 66211
June 18, 2013

Julyn Hussey, Procurement Manager
Cc: Kelly Wright, Purchasing Analyst
Florida Department of Corrections
Bureau of Procurement and Supply
501 South Calhoun Street
Tallahassee, FL 32399-2500

Re: Request for Best and Final Offer, ITN # 12-DC-8396

Dear Ms. Hussey,

On behalf of our entire account management and service teams, thank you for this opportunity to provide a Best and Final Offer to the Florida Department of Corrections.

As shown in our response, CenturyLink is able to provide all the additional negotiated services at affordable pricing. In addition, our network capabilities and existing presence in Florida would enable us to provide all these capabilities with the highest service standards – to the Department, its inmates, and their family members.

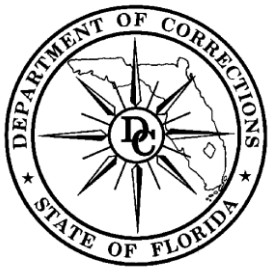
If you have any questions please contact me at the number below, or Vicki Johnson at 888.375.7318 or 850.212.8880. Thank you again and we look forward to hearing from you.

Sincerely,

Paul Cooper
General Manager
CenturyLink Correctional Markets
913.345.6002
paul.n.cooper@centurylink.com

State of Florida

Department of Corrections



REQUEST FOR BEST AND FINAL OFFERS (RBAFO)

FOR

STATEWIDE INMATE TELEPHONE SERVICES

In Reference To
INVITATION TO NEGOTIATE
ITN # 12-DC-8396

RELEASED ON
June 14, 2013

Responses to RBAFO Due By
Close of Business (5:00 p.m. ET) Tuesday, June 18, 2013

BY THE
DEPARTMENT OF CORRECTIONS
BUREAU OF PROCUREMENT AND SUPPLY
501 SOUTH CALHOUN STREET
TALLAHASSEE, FLORIDA 32399-2500
(850) 717-3679
FAX (850) 488-7189

Primary Contact: Victoria Johnson
victoria.l.johnson @centurylink.com | 850.212.8880

The Florida Department of Corrections has issued this
REQUEST FOR BEST AND FINAL OFFER (RBAFO)
For
STATEWIDE INMATE TELEPHONE SERVICES

This is the Request for Best and Final Offer (RBAFO) in response to negotiations with three (3) respondents to the Department's ITN# 12-DC-8396. This RBAFO contains Pricing, Additional Negotiated Services, and Value Added Services as discussed during negotiation and outlined below. The other specifications of the original ITN, unless modified in the RBAFO, remain in effect. Respondents are cautioned to clearly read the entire RBAFO for all revisions and changes to the original ITN and any addenda to specifications, which are incorporated herein and made part of this RBAFO document.

Unless otherwise modified in this Request for Best and Final Offer, the initial requirements as set forth in the Department's Invitation to Negotiate document and any addenda issued thereto have not been revised and remain as previously indicated. Additionally, to the extent that portions of the ITN have not been revised or changed, the previous reply / initial reply provided to the Department will remain in effect.

CenturyLink has read and understands these requirements.

A. PRICING

The Respondent shall provide their Best and Final Offer for rates on the below Cost Proposal Table. Costs should be submitted with the most favorable terms the Respondent can offer.

NOTE: Blended Telephone Rates for family and friends shall not exceed two dollars and ten cents ($2.10) for a fifteen (15) minute call.

The Department is seeking pricing that will provide the best value to the State. The Department desires that the resultant contract generates the highest percentage of revenue for the state and the lowest possible telephone call rate charges for inmate families and friends.

COST PROPOSAL

	INITIAL Contract Term 5 years	ONE Year Renewal	TWO Year Renewal	THREE Year Renewal	FOUR Year Renewal	FIVE Year Renewal
Department Commission % Rate Proposed	62.6%	63.6%	63.6%	64.1%	64.1%	64.1%
Blended Telephone Rate for All Calls* (inclusive of surcharges)	$.099	$.099	$.099	$.099	$.099	$.099

CenturyLink's offered calling and commission rates are meant to best balance calling rates with commission revenue to the State. We also add that the blended rate offered above does NOT utilize a per-call surcharge – i.e. CenturyLink would charge end-users $0.099 per minute, without a per-call

surcharge. This constitutes a significant decrease in end-user rates while providing a substantially higher commission to the State.

While including a per-call surcharge could decrease our reported blended rate (by spreading the surcharge over the *maximum* call length of 15 minutes/call, rather than actual call length), CenturyLink advocates this rate structure for the Department:

- The issue of refund disputes is eliminated – e.g. if a family member accidentally hook-flashes during a call – because called parties pay only for the minutes they use.
- Inmates make more frequent calls and connections with family members, since a short call is less expensive. Our experience in other States shows that this more frequent calling has the added benefit of providing more overall commission revenue.

Further, CenturyLink reaffirms that the commission percentage above will be paid on all call charges from all phones – both inmate and coin-operated – and that commission payments will be audited bi-annually by a certified public accounting firm.

Finally, we ask for special consideration of CenturyLink's revenue performance vs. other providers as presented in our ITN response and negotiation session. CenturyLink's billing & customer service program consistently completes more calls and generates 25% or more commissionable revenue than other providers, in addition to providing fundamentally better service to end-users.

B. ADDITIONAL NEGOTIATED SERVICES

The Department is interested in the following services that were addressed during negotiations:
The Respondent shall provide a detailed description of each of the below services, systems and/or equipment functionality, in narrative form. If included in the Contractor's BAFO and all, or a portion of, are accepted by the Department, these services shall be provided as part of the contracted service, and at the rates shown in the Cost Proposal (see Attachment 1) submitted in the respondent's BAFO.

CenturyLink has read, agrees, and will comply. Our solutions for each of the additional services requested are industry-leading, and meet or exceed the Department's requirements. Detailed descriptions are provided below under each service.

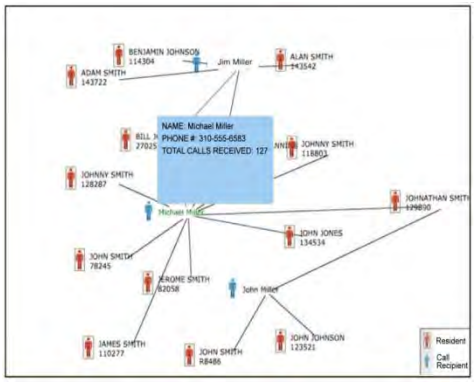
- Investigative functions : An Investigative tool with the ability to import external sources of data and at least one (1) dedicated staff person to assist with analyzing investigative data;

  CenturyLink is able to provide to the Department. These functions are a standard feature of our proposed system, and we are able to provide dedicated staff with minimal impact to our financial offer as shown in Attachment 1.

  Specifically addressing staffing, our proposal includes one (1) qualified full-time staff member, with competitive salary and benefits, f that is 100% dedicated to investigation work, as well as an in-state Program Manager with investigations as a primary function. Additional personnel are of course available to the Department if needed.

Primary Contact: Victoria Johnson
victoria.l.johnson @centurylink.com | 850.212.8880

The Enforcer platform is equipped with an import utility that will accept & import data from external sources. This import utility\application will accept data in any pre-defined format and the application will normalize the data into XML format prior to updating the centralized database. Both the source file and the normalized XML file will be stored and achieved to audit data integrity.

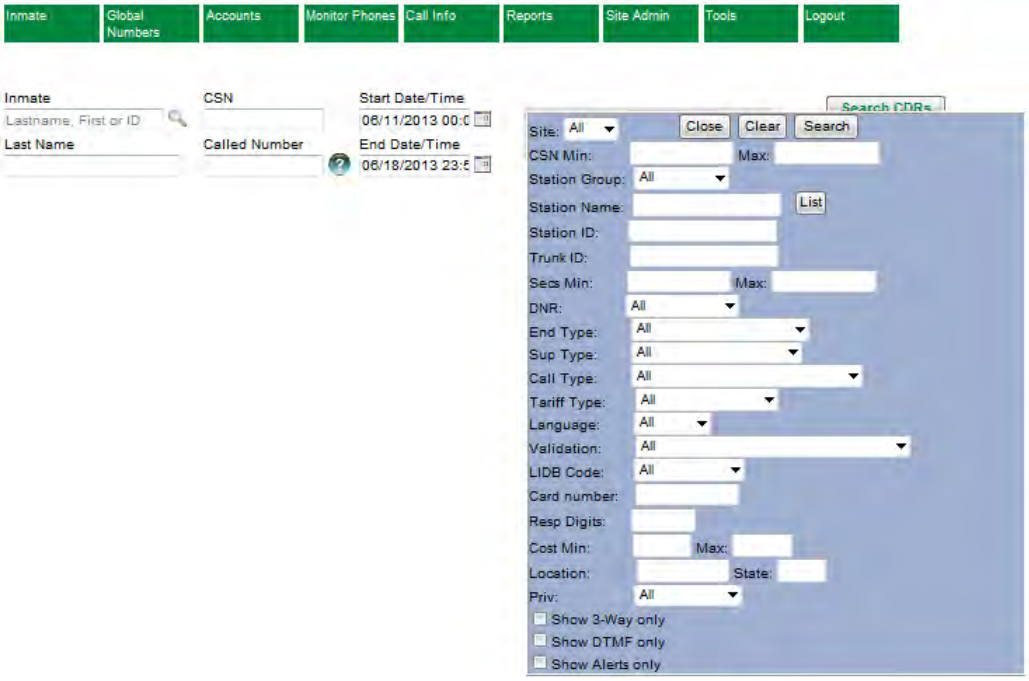


CenturyLink will collaborate with the Department to customize the link analysis and resulting reporting on our dedicated platform.

Custom query analysis

Through custom query analysis, users are able to define patterns and criteria that are suspicious and require follow-up by Department or CenturyLink investigations staff. Suspicious calls may be notated in the system and/or marked for follow-up by another investigator, or marked for personnel to listen to directly for further analysis.

Because CenturyLink would implement a system dedicated to FL DOC, custom queries and reports are able to be developed in an accelerated timeframe, with criteria and screens customized to the Department's business rules.



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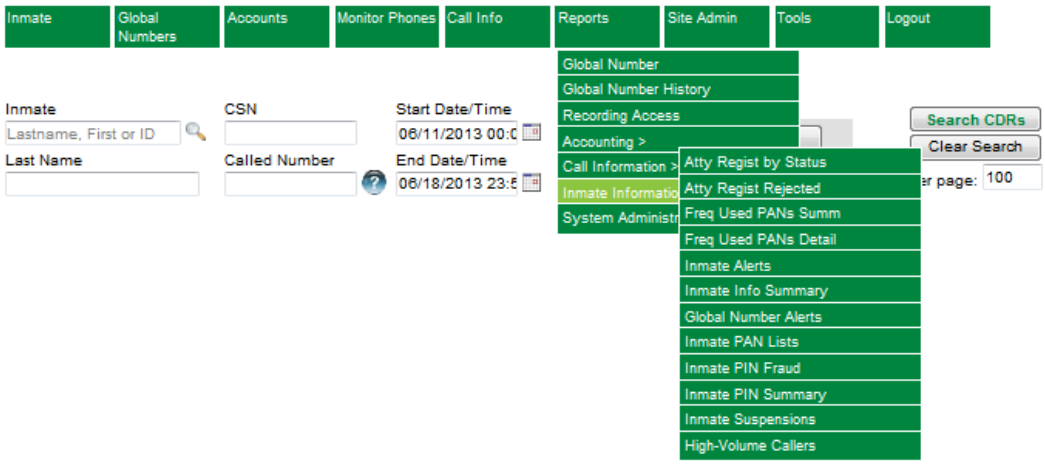
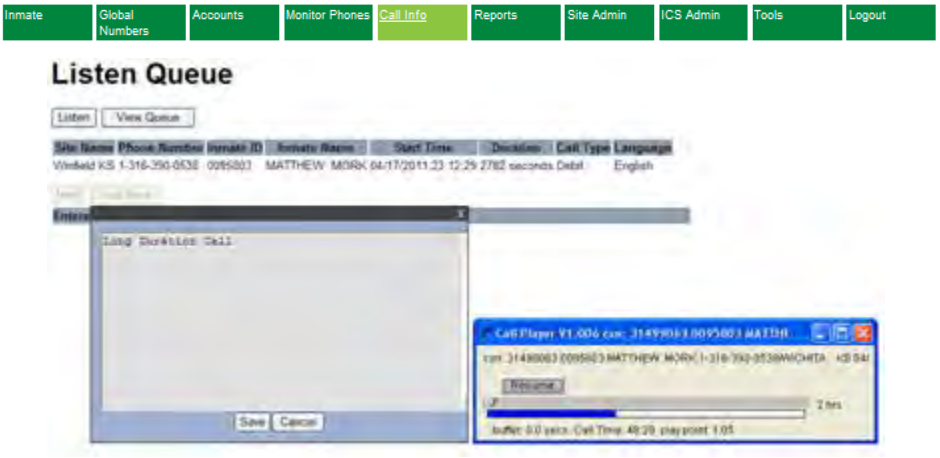
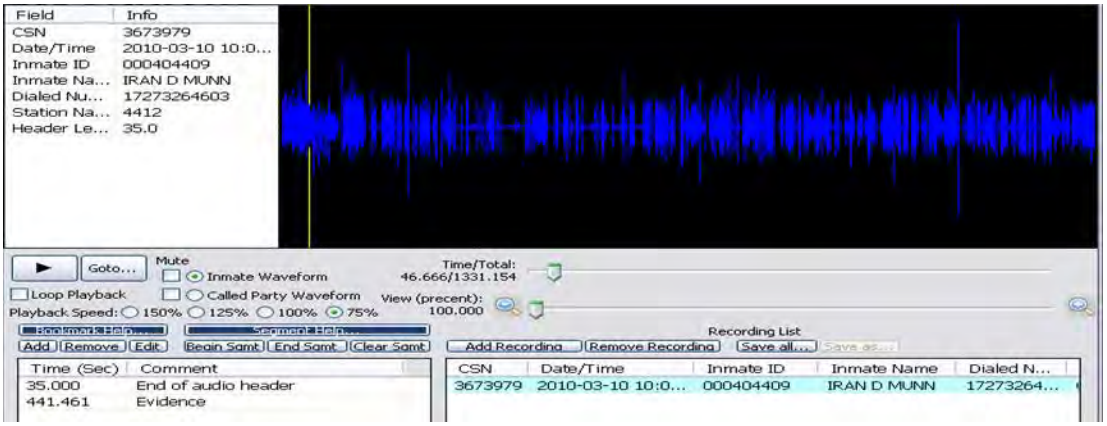


Listening queue

Once calls are identified as suspicious and needing further review, the Enforcer's Listen Queue tool helps Investigations manage case activities. Depending on the Department's rules, authorized listeners can choose calls randomly or be 'forced' to listen to identified calls in order, then include notes and follow-up. All functions are tracked for management review.



Listening productivity is also enhanced by the Enforcer's Enhanced Call Player, which allows users to isolate portions of the call, skip, or speed up playback (note human speech can be sped up approximately 130% without loss of understanding). In this way a 15 minute phone call can be reviewed and notated in as little as 3 or 4 minutes.



- Forensic extraction options: Minimum of six (6) Universal Forensic Extraction Devices (Cellbrite or equivalent); and off site examination of data - maintaining a defendable chain of custody;

  CenturyLink is able to provide to the Department the required number units, along with off-site examination of data. More units are available by negotiation.

  CenturyLink offers **Cellebrite's *UFED Ultimate*** all-in-one mobile forensic solution. UFED Ultimate performs physical, logical, and file system extractions of cell phones – performing a complete data extraction of existing, hidden, and deleted phone data, including call history, text messages, contacts, email, chat, media files, geotags, passwords, and more. UFED Ultimate will the Department unparalleled access to investigative cellular data.

  Ultimate also includes *UFED Physical Analyzer*, the most powerful and feature-rich mobile forensics tool in the industry. UFED Physical Analyzer highlights the most critical components of an extracted phone's memory data, making navigating through the data easier and more flexible than ever. Users can generate reports, print them, and/or save them to their computer in PDF, HTML, XLS, and XML formats.

  Each Cellebrite unit will be coupled with a dedicated computer configured with a shared drive and interfaced with the CenturyLink secure network. The authorized Cellebrite user would utilize the export utilities inbedded in the device to transfer an image of the extracted extracted cell phone data to the shared drive. This data image will be hashed to ensure its integrity and support downstrean data authentication. Additionally, the Cellebrite utility will export the extracted data in XML format and move to the shared drive on the computer. CenturyLink will configure its centralized platform to query these shared drives every 15 minutes and automatically transfer the data image and XML files to the centralized secure data repository.

  Extracted data can subsequently be merged with the calling data from the inmate calling platform and utilized to generate activity activity leveraging link analysis tools.

- Video visitation: Pilot program at five (5) facilities, identified by the Department, with an option for statewide implementation, at the Department's discretion.

  CenturyLink is able to provide to the Department. The industry-leading video visitation program offered is available to be deployed without impact to our financial offer for inmate calling services and in fact provides an additional revenue source for the State.

  CenturyLink, along with partner HomeWAV, is pleased to offer the HomeWAV Web Access Visitation System to the Department. The System basically works like the inmate telephone system. The inmate visitation stations are installed in facility dayrooms or other locations, often near inmate pay phones, for convenient inmate access. Also, as described below, the System employs a dynamic, immediate scheduling approach that avoids the need for facility personnel involvement in "schedule in advance" programs utilized by other video visitation system. This approach avoids the costs and logistical problems and frustration encountered reacting to daily facility operations (lockdowns, transportation, etc.) with visitation systems that require advance visitation scheduling.

  The System will make use of the existing wiring, cabling and video visitation stations currently located in the facility to the extent possible. At least one of the existing video visitation stations in each dorm, pod, or room will be left in service until the System is installed and accepted by the Department. This avoids any interruption in video visitation while installation is underway.

  System Description
  The System is comprised of off-the-shelf hardware consisting of visitation stations, signal converters and servers as required. The visitation station contains the processor, monitor, camera, and handset; the physical dimensions are 26" width, 18 ½" high, and 6" deep.
  The System's unique, patent pending software allows inmates to initiate video visits, on the inmate visitation stations, direct with approved visitors. No Facility personnel are required in order to schedule or to connect an inmate's video visit with his pre-approved visitor. No other Internet based video visitation system offers this significant cost saving solution. The System essentially works just like the Facility's inmate pay phones.

  The System does not require a minimum call length or require a connection fee. The System supports call lengths from one minute to the maximum set by the Facility in one minute increments, charges in one minute increments, and allows visitors to buy minutes in one minute increments. Additionally, the System allows inmates and visitors to send one minute video messages that the receiver can view the next time they accesses the System. If desired, these instant video messages may be used to communicate convenient times for a visit between the inmate and visitor.

  The System provides for positive identification of inmate and visitor with unique personal identification numbers, and can record all visitation events simultaneously.
  Visitors do not need to purchase any proprietary hardware or software in order to use the System from their home computers; all that is needed is a computer with high speed Internet access, Adobe Flash Player, a web camera, microphone and speakers. Visitors can also connect with an Android or Apple smart phone with dual cameras for remote visitation.

  The System allows every station to be used simultaneously. The number of approved visitors who take part in on-site video visits can be set at any number the Facility determines; the System does not limit the number of approved visitors who take part in off-site video visits.

In addition, the System has comprehensive visitation reporting capabilities with user friendly filtering options.

Visitors and inmates are notified in both English and Spanish that their visit is being monitored and recorded

The System is permissions-based to allow the Department to assign different levels of access to allow individual users access to different privileges in the System

The System provides for visitation recording with the following capabilities:

- Automated management capabilities.
- Recordings stored in Cloud-Based off-site storage servers for sixty days from the date visits take place.
- Method to determine if information was altered.
- Form of a digital file.
- Accessible via a web portal.
- Can be sorted and are searchable.
- Can be downloaded for review and can be saved to a hard drive.
- Access to recordings and logging is permissions based.
- Recordings are date and time stamped.
- Recordings have archiving capabilities.

Administrative/ Control Station

The Administrative Station is connected to high speed Internet access and will allow designated facility personnel to monitor, record, and interrupt visits, and to perform other functions as described herein. The Administrative software has the following capabilities:

- Terminate any or all video visitation conferences at will.
- Interrupt a video visitation conference while in progress.
- Monitor any video visit in progress, without knowledge of the participants.
- Allow inmate to re-connect an interrupted video conference call for the unused remaining predetermined time.
- Adjust the pre-determined visitation time and length of any or all video visits, before or during the visit.
- Provide a graphical representation for the different status of all video visitation stations.
- Control remote connectivity within the facility.

Additionally, the System has a Dashboard for visitation management purposes with the following capabilities:

- Set up visitations designated by user type (standard or professional) with preset conditions
- User type visitation information can be displayed
- Set a time duration for visitations that will automatically end after the designated time
- Blind monitor non-confidential visits; participants aren't aware of monitoring

Training

On-site training will be provided to facility personnel to ensure they have the skills to run and administer the system. The first session will be prior to the System turn-over, the second session at turn-over, and the third just after turn-over. All training will be coordinated with the Department. Instruction will not begin until the System is installed and ready for use.

The training sessions cover system concepts and the control console operation in detail, stressing all important operational and service diagnostic information necessary for maintenance and operational personnel to efficiently use and maintain the System.

CenturyLink will provide copies of the operator's manual, which is written in laymen's language, and describes all control panel icon operations, graphic symbol definitions, and a complete explanation of all software and functions. Video training materials will also be provided.

Technical Support

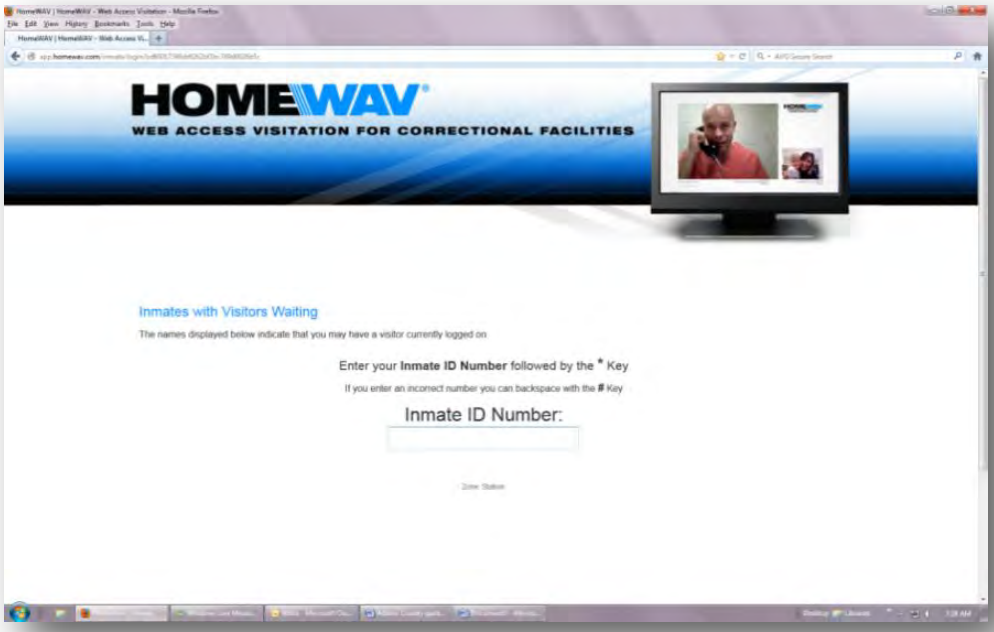
HomeWAV has a toll-free telephone technical support center that provides technical support to their customers. The technical support center is staffed with trained and certified video technicians that can assist staff and visitors in the use and problem resolution of the System.

The same CenturyLink's field technicians servicing the inmate telephone system would also carry spare parts and be certified for repair of the video visitation system. This minimizes response times and disruptions to Department facilities.

Inmate Operation of the HomeWAV System

1. Go to any available inmate station

2. Press any button on keypad to wake up the station

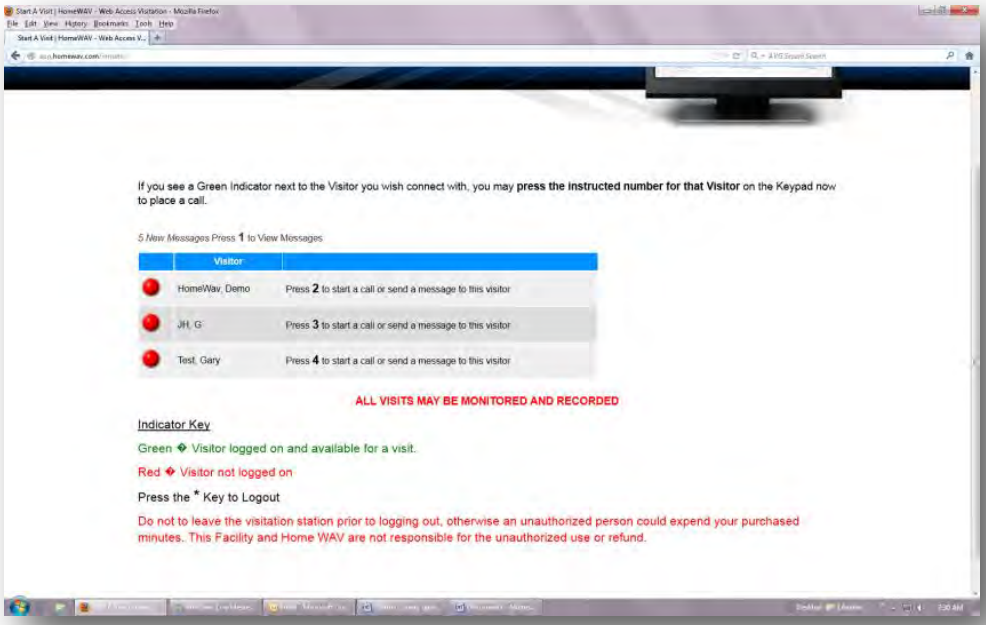


Primary Contact: Victoria Johnson
victoria.l.johnson @centurylink.com | 850.212.8880

3. Using the keypad; enter your Inmate ID number, then Press * (asterisk symbol)

4. Enter PIN number; Press * (asterisk symbol)

5. System displays “Accepted” or “Invalid PIN Number”



6. If accepted, the screen displays the list of registered visitors.

7. Available visitors will display a green ball; Unavailable visitors will display a red ball

Select a Visitor:

1. Select the desired available visitor by pressing the visitor's number on the keypad

2. System will automatically place the video call to selected visitor:

- The visitor must accept the incoming call.
- 30 seconds after the call is accepted, the billing starts.

3. Billing stops when call is terminated by the visitor, terminated by the inmate using the * key automatically disconnected by default visit time length, when available minutes run out or are terminated by the facility.

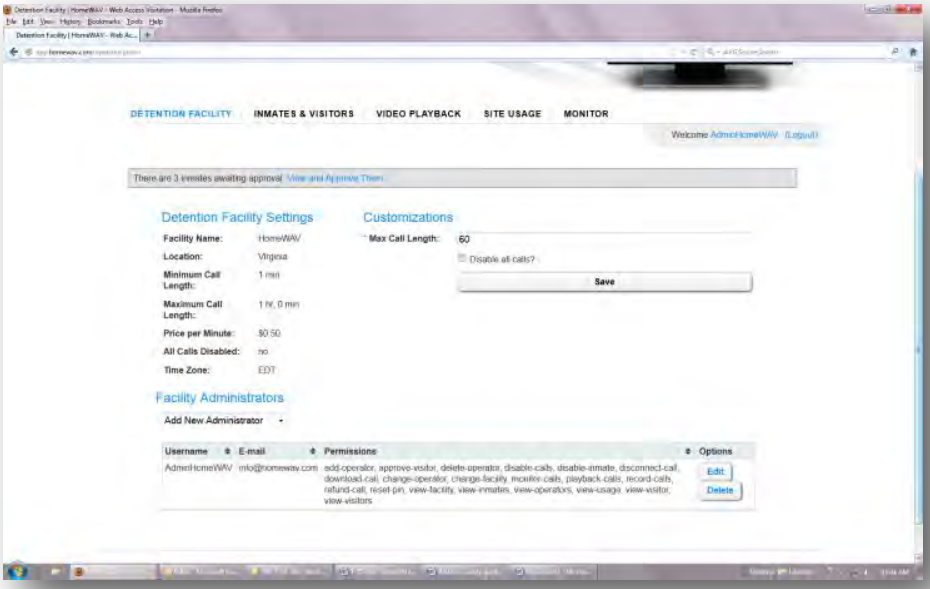
Initiating a session is that simple. When combined with our no-minimum, per-minute billing per session the issues inherent with traditional scheduled visitation systems – refund requests, complaints, re-schedules, etc. – are all but eliminated.

Primary Contact: Victoria Johnson
victoria.l.johnson @centurylink.com | 850.212.8880

Security Administration Capabilities Overview:

Initially, Home WAV provides the Facility Administrator a User Name and Password with all permissions allowed. During training and installation, a CenturyLink or Department Administrator can then set up operators with different sets of permissions based on the operator's requirements.

Department of Corrections Tab



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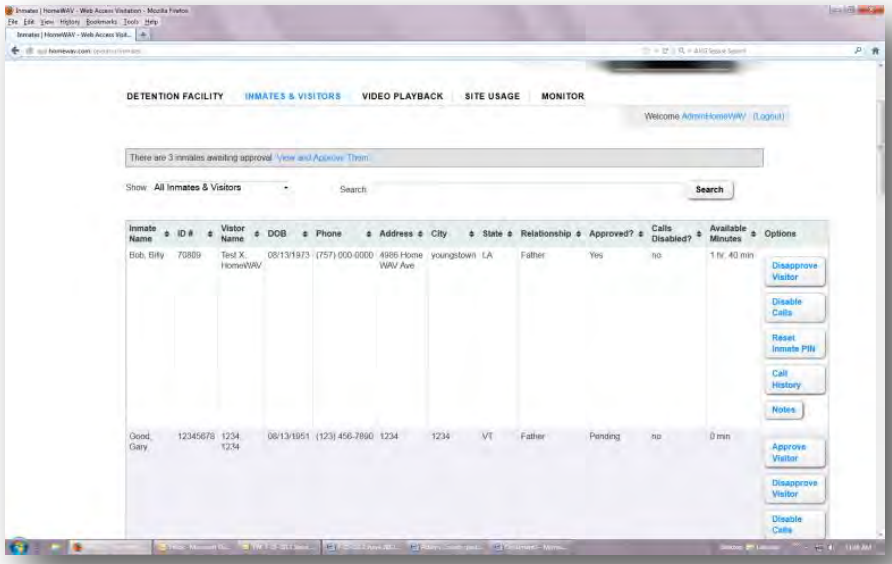
- Can view facility settings
- Can disable all calls for an facility
- Can edit maximum call length
- Can view all operators in the system
- Can create new facility administrator
- Can delete a facility administrator
- Can make changes to a facility administrator

Primary Contact: Victoria Johnson
victoria.l.johnson @centurylink.com | 850.212.8880

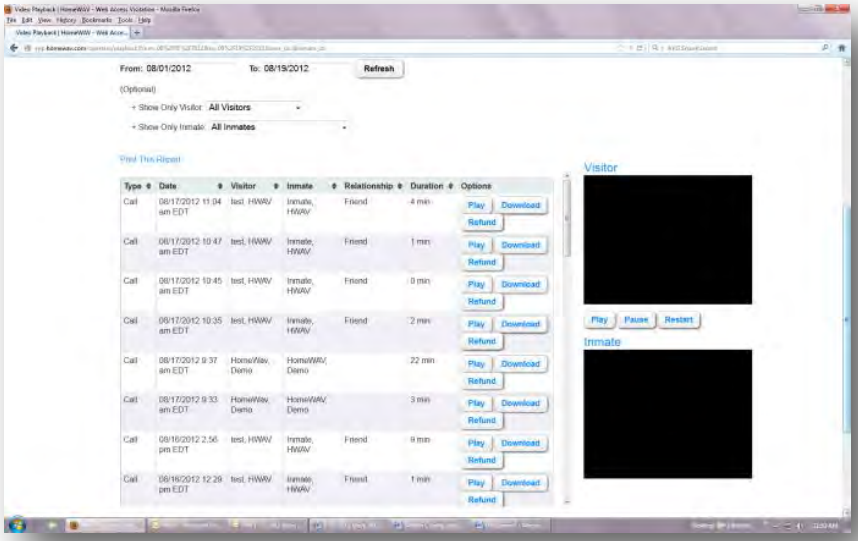
Inmates and Visitors Tab



- Can view all inmates in the system
- Can disable an inmate from logging in and making calls
- Can reset an inmate's login PIN
- Can toggle recording on inmate calls
- Can view all visitors registered to the facility
- Can approve/disapprove a visitor
- Can view individual visitor details

Primary Contact: Victoria Johnson
victoria.l.johnson @centurylink.com | 850.212.8880

Video Playback Tab



- Can playback previously recorded calls
- Can download a previously recorded call
- Can playback previously recorded video messages
- Can quarantine a video message
- Can refund a call

Usage Tab

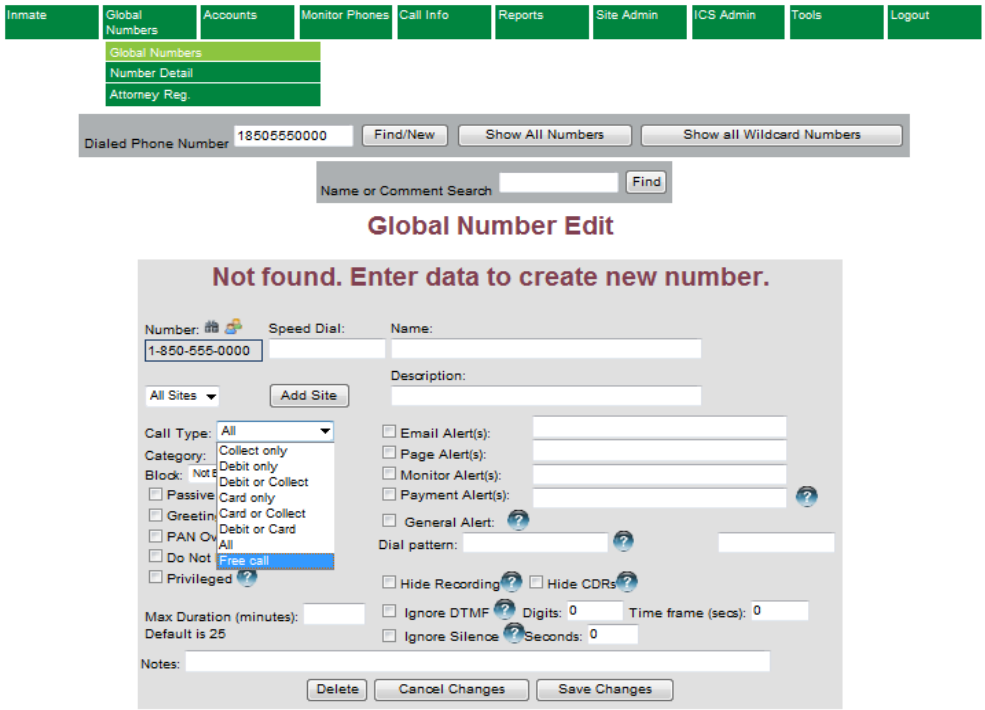
- Can monitor active calls
- Can view facility usage by day/monthy/year
- Can disconnect an active call

- Free Calls: In 5, 10 and 15 minute increments. Calls will be authorized at the Department's discretion.

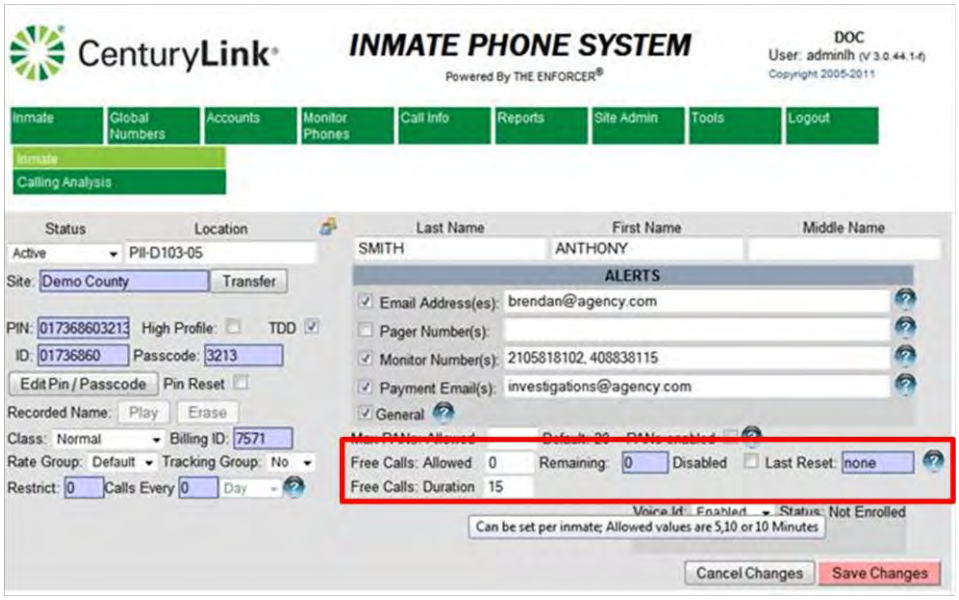
  CenturyLink is able to provide to the Department, and without impact to our financial offer.

  As discussed during our negotiation with the Department, free calls are easily configured within the system – either manually from the inmate screen or through an automated interface from the Offender Management System.

  Calls to DOC-designated information, informant, or other lines are easily configurable as free to authorized users.



In addition, specified numbers of free calls for designated inmates – e.g. as a reward system as discussed during negotiation – are also able to be designated by authorized users. The number of free calls, in addition to their duration, are configurable by inmate as shown on the screen shot below.



Again the scope of free calls discussed with the Department are such that CenturyLink is able to provide without requiring increased calling rates or decreased commissions. In summary, calls to Department-designated numbers such as the PREA line, an investigator, automated information, etc. are always free and provided without any impact to our financial offer. Free calls for specified inmates as discussed during negotiation will also be made available to the Department without impact to our financial offer.

- Cell phone detection: Minimum of 15 detection units (cellsense or equivalent).

CenturyLink is able to provide and exceed the minimum number of units requested through partner MetraSens, maker of the CellSense product. Our 'base' offer described in Attachment 1 includes twenty (20) units with a very modest impact to commission, with additional units available by negotiation.

CellSense, by MetraSens, is a proven system for detecting the presence of cell phones in or on the body, even if the phone is switched off. Operational prison deployments have demonstrated it to be reliable, accurate and effective. It has the advantage of also detecting other contraband items such as shanks, knives and small blades.

Rapid and un-announced deployment and the ability to scan up to 40 individuals per minute means that it is clearly the most cost effective and flexible cell phone detector available worldwide. It can even be deployed covertly since it has the ability to scan through brick, wooden, or plasterboard walls.

CellSense is designed to detect moving "ferromagnetic" objects and will not false alarm on static metal items, no matter how close. CellSense has the portability of a wand and the full body

scanning convenience of an archway metal detector. The unit can scan 40 individuals per minute without contact or intrusion which makes it the most cost effective cell phone detection system of its kind.

- Interactive Voice Response (IVR) scheduling: appointments, grievances etc.

  CenturyLink is able to provide to the Department. These functions are a standard feature of our proposed system, and we are able to offer them without impact to our financial offer.

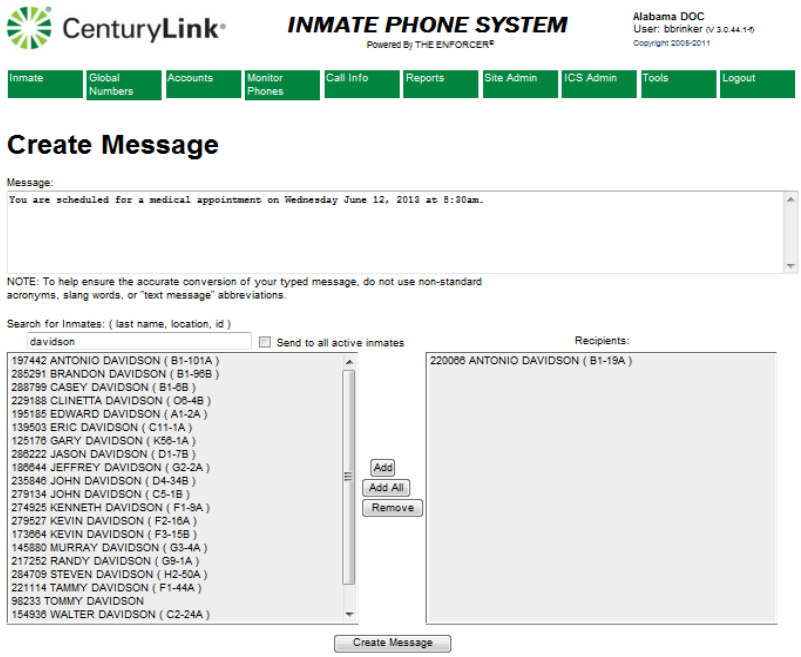
  Scheduling

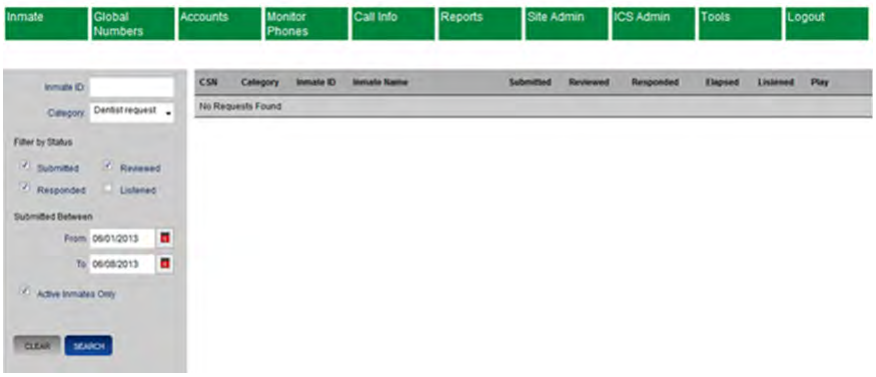
  Through standard IVR data entry and response technology, the Enforcer can be used to deliver medical or other appointment information to and from inmates. This provides an automated means for inmates to request appointments and receive responses, all in a single, trackable system. The system's voice messaging module can also be used, for example, for inmates to describe symptoms to medical staff.

  This improves the efficiency by reducing labor costs as information passing move away from traditional paper ordering as staff spends less time collecting and processing medical forms.

  Implementation will be custom-designed for FL DOC's needs, with screens and/or search criteria developed on CenturyLink's FL DOC-dedicated platform for its use.

  Staff is able to respond by voice (through staff-to-inmate voicemail) or through text (through the Enforcer's imbedded text-to-speech converter). Regardless of the method, all communications are recorded and auditable.





Other Information sharing: Inmate Information Line / "Message of the Day"
Both functions are already in place at the Nevada DOC.

The Inmate Information Line allows inmates to check information such as release dates, account balances, and other simple information through straightforward prompts within the ITS. Velocity restrictions can also be placed so that inmates are able to call into the IVR no more than once or twice a day.

Using a voice messaging system Facility staff can create a "Message of the Day" that is delivered to inmates via inmate phone during a specified time period. Facility staff can type the message into the ITS, and the message is translated to a voice recording using text-to-speech technology; or staff can use traditional voice recording to record their message. They then enter the time window (start/stop dates and times) during which the message will be played to inmates. Any time an inmate picks up any inmate phone during the designated timeframe, they will hear the Message of the Day before call connection. When the message expires, it is no longer played to inmates, with no further action necessary from Facility staff.

Individual facilities can use the Message of the Day feature to share information with inmates facility-wide. Additionally, with proper authorization CenturyLink or Department

staff can create messages to inform inmates of new product rollouts, Facility-approved rate modifications, or other changes to inmate calling services.

Grievances – 100% paperless reporting
Our grievance reporting process can supplement the Department's existing grievance reporting process. With our paperless telephone process, inmates can file grievances, make PREA or crime tip reports, or even file complaints about the Inmate Telephone System – all using secure voice mailboxes on any standard inmate telephone.

Depending upon the type of inmate report, the appropriate Facility staff will be automatically notified when an inmate files a new grievance. Using text-to-speech technology or traditional voice messaging as described, staff can respond to inmate reports via the ITS, and the response will be delivered to a secure voice mailbox for inmate retrieval. All grievances and responses are tracked and can be provided through a custom-developed report for the Department.

CenturyLink is able to provide these additional services over the ITS due to its position as a network provider, which in turns allows us to "over-provision" the extra bandwidth needed to handle these types of transactions. In addition, by moving these simple high-volume transactions from the kiosks to the inmate phones, kiosks are freed-up for other transactions

- Continuous Voice Biometrics

CenturyLink is able to provide to the Department. Industry-leading voice biometric technology has already been integrated into our proposed Enforcer inmate telephone system platform. Because this technology involves 3rd-party royalty costs, deployment does impact our financial offer as described in Attachment 1.

The Investigator
CenturyLink has partnered with JLG Technologies, LLC to offer the most advanced voice biometrics software available in the corrections market today. The Investigator incorporates technology developed for the United States Department of Defense for its own voice security and detection applications. **CenturyLink has had the Investigator deployed for over 5 years and is the only provider to have continuous voice biometrics deployed in a state DOC. We invite the Department to contact the Nevada and/or New Hampshire DOCs to discuss how The Investigator has positively impacted those agencies.**

Advanced voice biometric technology automatically detects and marks suspicious activity

Suspicious Call Finder
Conventional voice verification systems – where inmates' voice prints are verified before the call starts but not after – have two major limitations: first, they do not detect inmates

handing the phone to another inmate after validation, and second, in the case of a verification failure, they only record the event.

The Investigator's Suspicious Call Finder module eliminates these limitations and provides analysis of inmate voices throughout the entire call; in addition, it provides the key piece of information correctional facilities value: the probable identities of imposters. When a call is completed, the Investigator goes to work uses specialized hardware and software to perform the billions of mathematical computations necessary to intelligently compare previously enrolled inmate voice models against the voices on the call, determining the highly probable identities of imposters.

Pre-Call Imposter Detection

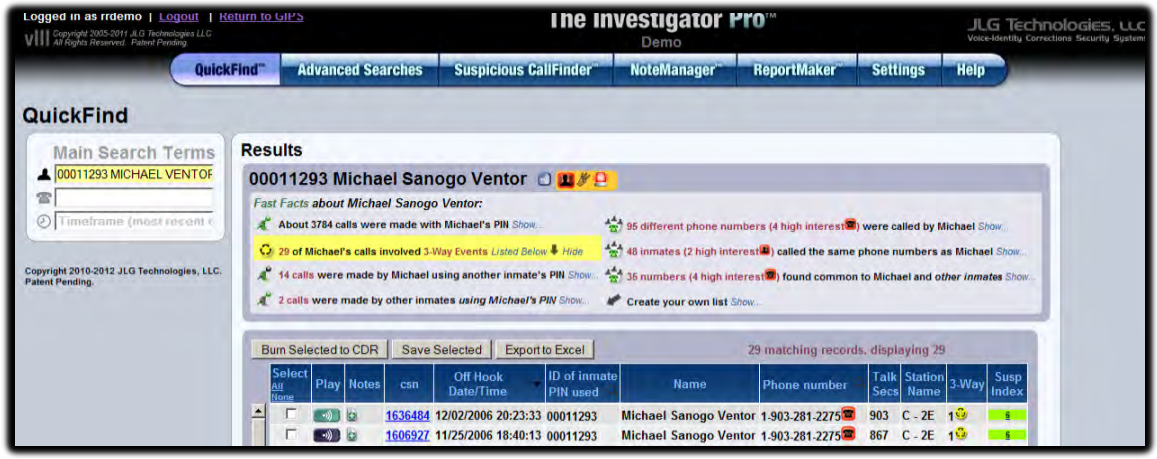
The Investigator Pre-Call Imposter Detection module provides pre-call imposter screening. When an inmate initiates a call attempt, the Pre-Call Imposter Detection module compares likely imposters against the voice being provided at the time of the call initiation. Instead of the conventional approach of comparing the inmate voice against a previously recorded sample of the inmate voice, it utilizes its imposter detection system to see if an imposter is trying to make the call and alerts the facility of which inmate imposter is trying to defeat the system.

Voice-Biometrics Enhanced Link Analysis

The Investigators QuickFind tool results take into account all the intelligence the system has acquired and returns it in easy to understand statements. Each statement represents types of calls the inmate has made or information that associates that inmate with other inmates and their outside called parties.

Categories of calls the investigator can quickly search on are:

- Completed calls made by that inmate PIN
- Any calls where a 3 way call has been detected (a means to hide contact with an unknown called party)
- Calls when the inmate used another inmate PIN (an attempt to hide the inmate identity)
- Calls made where other inmates have used this inmate's PIN (an attempt to hide their identity)



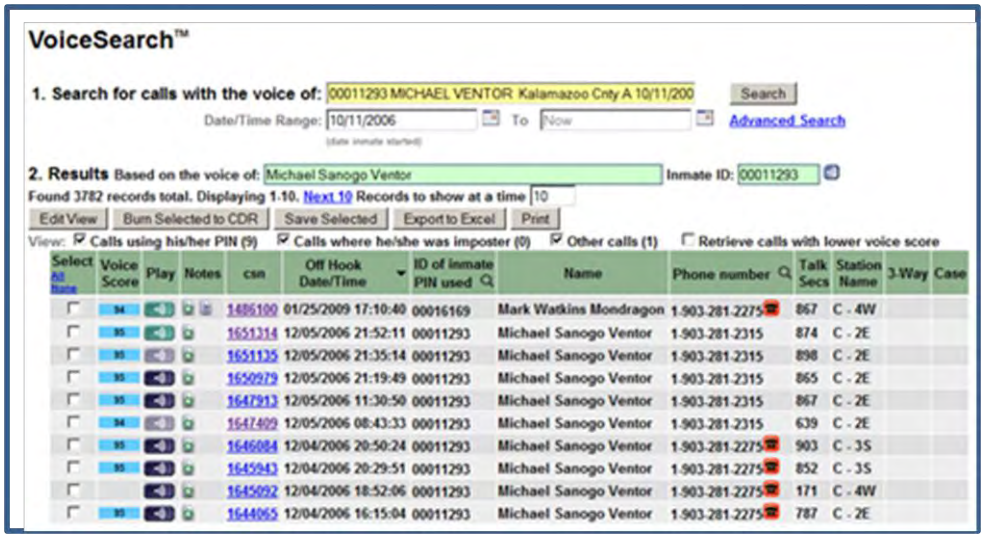
Primary Contact: Victoria Johnson
victoria.l.johnson @centurylink.com | 850.212.8880

Other Investigator System Reports

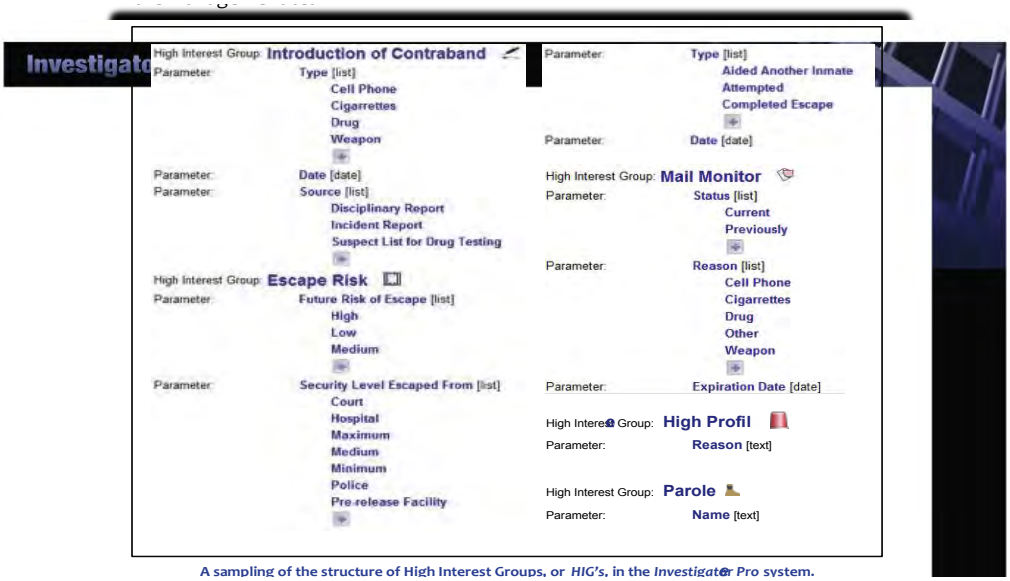
The Investigator features a number of different system reports that assists the facility investigator in focusing the attention on the most valuable calls to investigate. For investigators, the reports include: enrollment reports, pre-call imposter reports, high-value target calls for review, high-interest-group activity, and a variety of other reports that show frequent abusers of accounts, accounts being abused, and involved called parties. For leadership, the Investigator includes Management Reports to track product usage, ensure user accountability, and provide instant access to any case or inmate-sensitive call activity.

For brevity, a small sample of these reports and search screens are provided below.

Investigators are able to quickly search for all calls with suspected of PIN abuse, by calls using a specific inmate's voice, or any other number of search criteria



A sampling of the structure of High Interest Groups (HIGs) in the Investigator Pro system



A sampling of the structure of High Interest Groups, or *HIG's*, in the *Investigator Pro* system.

Automatic reporting on High Target Calls for Review:

Management Reporting:

- Inmate voice mail: Maximum of thirty (30) seconds for friends, family and staff

  CenturyLink is able to provide to the Department. Note that voice mails sent from staff to inmates are always provided at no cost or impact to our financial offer; in addition, voice mails from friends & family to inmates incur a modest fee that is fully commissionable to the State.

Staff-to-Inmate Messaging

CenturyLink offers an inbound messaging service that allows facility staff and called parties to leave messages for inmates. Messages may be automatically retrieved by inmates through the inmate phone system and are available for access by facility personnel for security purposes, for the entire contract term. Using text-to-speech technology or traditional voice messaging, facility personnel and called parties can leave messages for inmates via The Enforcer, and the response will be delivered to a secure voice mailbox for inmate retrieval.

To create a message using text-to-speech technology, authorized facility personnel may simply log in to the system and type the desired message in the field provided and select the recipient, as shown in the screen below. Users have the option to send a message to an individual inmate, multiple inmates or the entire facility.

Inmate Messaging interface

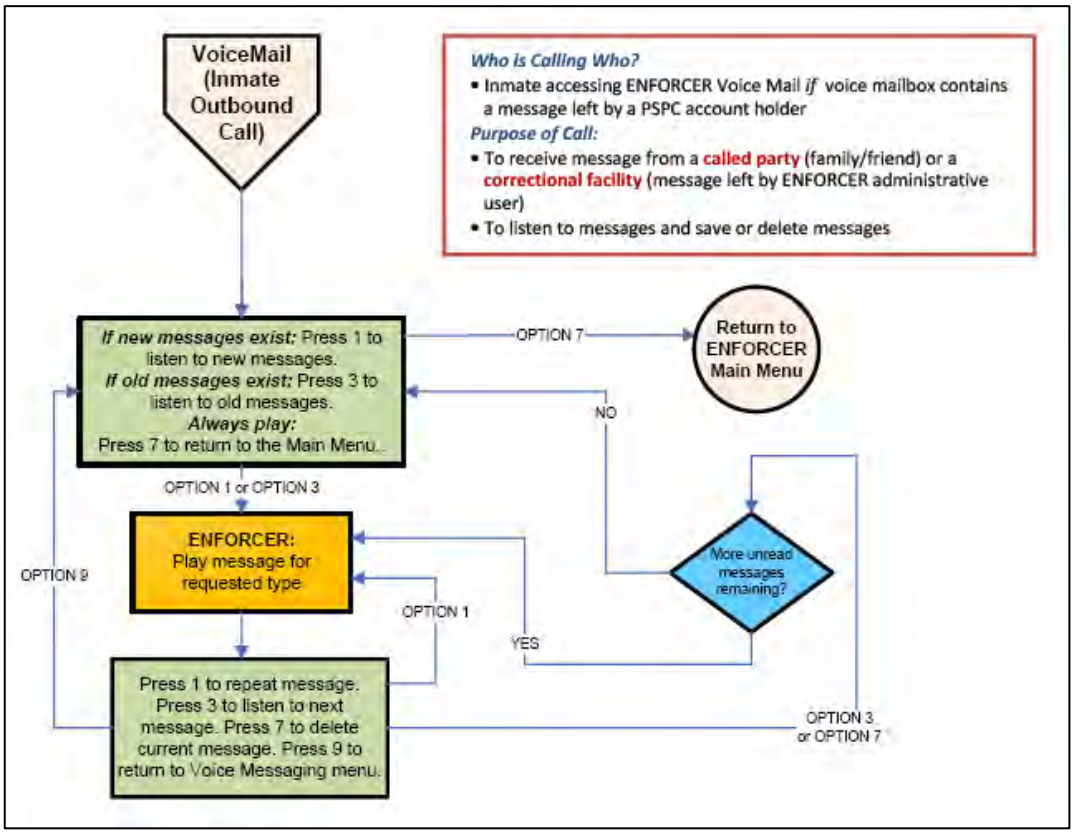
Inmate messaging services are fully integrated with TheEnforcer. A call detail record and recording will be recorded for each voicemail message and associated with the inmate's PIN. The advantage of hosting these voicemail boxes on the system is that each message will be attached to a complete CDR showing exactly what phone left the message, at what time, and the system user logs will track and time-stamp when each message is played back and by what user. Investigators can also use the Add Notes tools to notes for each call when they followed up on it, what they did etc. These notes will also be time-stamped and saved. The State will therefore have a complete and completely verifiable track record for investigations.

Primary Contact: Victoria Johnson
victoria.l.johnson @centurylink.com | 850.212.8880

Family-to-Inmate Voicemail

The ENFORCER can also accommodate messages left by called parties. The voicemail system requires the outside party to have an established PrePaid Collect account prior to accessing the system. The outside party would access the voicemail system by dialing the published toll-free number. Once connected to the voicemail platform, the outside party will be prompted to enter their PrePaid Collect account information to confirm availability of funds. If funds are available, the system will prompt the user to enter the inmate ID, or enter the first 3 letters of the inmate's last name to retrieve an inmate listing. The user will select an inmate from the listing and will be able to record a 30-second message.

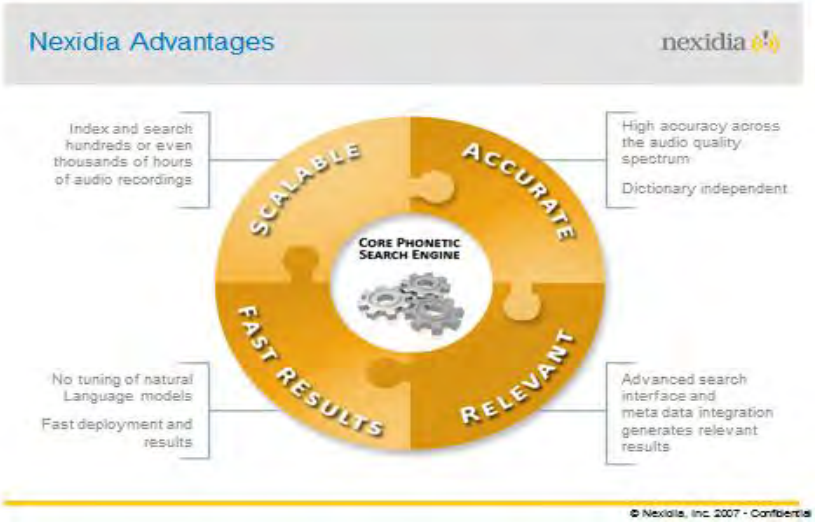
Below is a sample call flow of the inmate messaging system.



Inmate Messaging Call Flow

- Ability to search calls by keywords.

  CenturyLink is able to provide to the Department. To meet this requirement, Century Link will deploy keyword search from Nexidia™-- a state-of-the-art phoneme-recognition technology. This technology is vastly superior to traditional speech-to-text transcription-and-spotting programs because it identifies utterance patterns rather than specified words. As a result is widely deployed in banking and stock trading, in addition to correctional environments.



  Features of the Nexidia key word search tool include:

  - **Phoneme based search**: Reduces words to sounds of spoken language. Enables the software to match utterances – even those with an accent – with keywords (even if mis-spelled in the search database).
  - **Nested Queries**: Many searches (i.e. calls where the word "dope" is used) will return more calls than an investigator has time to listen to. Nested queries allow you to run a search, then search again within the results (i.e. first search for "dope" then search within results for "soon," or "get.")
  - **Structured Queries:** The meaning of many words or phrases depends on context. Nexidia allows you to run structured queries using and/or statements to quickly identify only those calls where a word is used in a particular way. For instance you could search for "Don't + tell," or "Beat-down + saw or heard."

  These capabilities are fully integrated into the Enforcer Word*Finder* Tool to simply searches using user-defined criteria:

- Capability to capture inmate to inmate telephone communications

  CenturyLink is able to provide to the Department. Through our partnership with JLG Technologies CenturyLink offers this capability to the Department at no cost or impact to rates or commissions.

  JLG Technologies developed *ICER* (short for Inmate Inter-Communication Evaluation and Reporting) to assist correctional agencies in the discovery and identification of phone calls where inmates are talking to other inmates — whether between pods or between facilities, typically through an accomplice or through some form of outside-facility call conferencing mechanism. When such calls happen with the use of the inmate telephone system, these calls are known as incidents of *Inmate-to-Inmate Communication* — or "ITIC events" for short.

  ICER's sole purpose is to analyze, and thus uncover, links. ICER accomplishes this goal in order to detect these ITIC events.

  The impetus for the development of *ICER* was a state DOC investigator who had randomly discovered an ITIC event. Two of the agency's inmates were communicating between facilities through an outside third party. The correctional administration had intentionally housed the two inmates in separate facilities for security reasons, in an effort to prevent them from communicating with each other. Each inmate had dialed a different phone number in a different state and the third parties bridged the callers together through a low-cost, off-the-shelf call conferencing system.

  A noteworthy aspect of this case was that the call bridging was not performed via a 3-Way call. As a result, no form of 3-Way call detection system would have detected the bridging of these calls.

  The most significant call bridging event uncovered during the evaluation period involved a series of calls where 5 different inmates from several different facilities had orchestrated a means to be connected simultaneously by dialing multiple different phone numbers.

Primary Contact: Victoria Johnson
victoria.l.johnson @centurylink.com | 850.212.8880

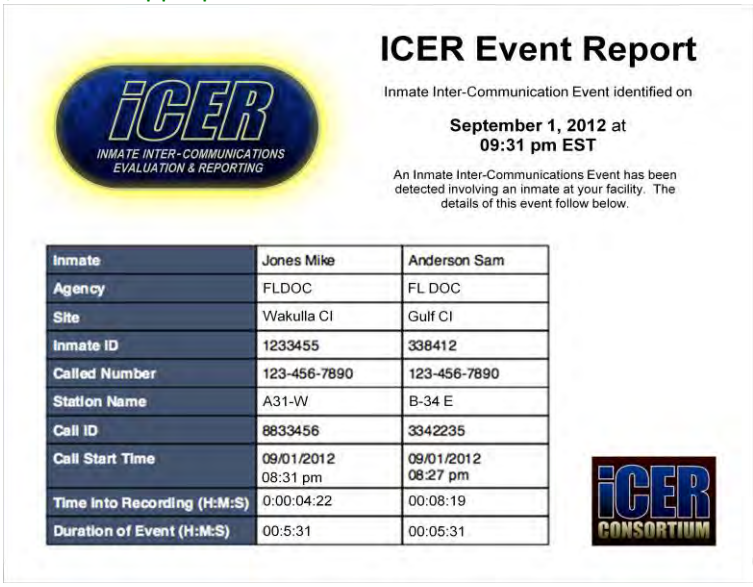
ICER System Description

The JLG Technologies ICER system uses advanced voice analysis technology to generate a "call signature" — a representation of the call that does not include any of the original audio — for each completed inmate telephone call. Call signatures are then encrypted and transmitted to the central data center at JLG Technologies headquarters in Framingham, MA for analysis. Because none of the original audio is used in a call signature, the ICER system is in full compliance with the myriad state laws regarding the transmission of call recordings.

Under normal operations, call signatures are created, transmitted and received at the data center within seconds of each completed call. Upon arrival, the call signature is immediately analyzed and checked against other call signatures. If an ITIC event is detected, it is logged in the *ICER* system database, and investigators from all relevant facilities are alerted through their Inmate Telephone System.

Due to the CenturyLink Team's strong existing customer base of Florida County Jails, we are also able to detect inmate-to-inmate events across different detention facilities.

ICER provides facilities with a detailed report of each detected ITIC event by means of a graphical user interface (GUI), so the facility can review the phone call involved in the ITIC event, and take appropriate action.



Inmate	Jones Mike	Anderson Sam
Agency	FLDOC	FL DOC
Site	Wakulla CI	Gulf CI
Inmate ID	1233455	338412
Called Number	123-456-7890	123-456-7890
Station Name	A31-W	B-34 E
Call ID	8833456	3342235
Call Start Time	09/01/2012 08:31 pm	09/01/2012 08:27 pm
Time into Recording (H:M:S)	0:00:04:22	00:08:19
Duration of Event (H:M:S)	00:5:31	00:05:31

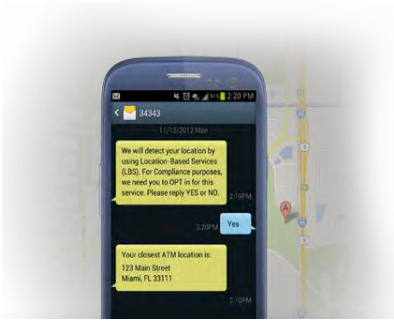
- Location based services of called cell phones.

CenturyLink is able to provide to the Department. Because the service requires payments to a third party provider, implementation would have a modest impact to our financial offer as shown in Attachment 1.

CenturyLink will leverage the Switchblade® platform to provide Location Based Services to the Department. Utilizing a combination of carrier network-based location and GPS, the Switchblade platform can access the consumer location regardless of carrier or cellular devise type. These Location Based Services are currently supported by Verizon, ATT, Sprint, T-

Mobile, Cricket, Boost and Virgin Mobile. The service will be expanded to include U.S. Cellular and MetroPCS later this year.

The capability is straightforward. In conjunction with the call delivery to the cellular device, the consumer will be prompted to allow the carrier to utilize their location (Opt In) or the call delivery greeting will be enhanced, based on carrier specifications, to notify the consumer that acceptance of this call will allow the carrier to identify their location and demand positive acceptance to proceed. Once positive acceptance is granted by the consumer and captured by the platform, the call is connected and the latitude/longitude coordinates are passed to the CenturyLink centralized platform and stored in the database.



Leveraging this expansive Switchblade® platform and the aforementioned operational process, CenturyLink can establish a "Geo Fence" perimeter around each facility and generate notifications or alerts to investigators when an inmate call is accepted within the designated Geo Fence perimeter. CenturyLink will work with the Department to implement this service so it will not impact operational efficiency or revenue generation while at the same time delivering the valuable security information to the Department.

In order to provide the best value to the state, the Department reserves the right to accept or reject any or all of the additional negotiated services.

CenturyLink has read and understands the Department's right to accept or reject any of the additional negotiated services.

Primary Contact: Victoria Johnson
victoria.l.johnson @centurylink.com | 850.212.8880

C. VALUE-ADDED SERVICES

Value-added services include any services, including additional services that the Contractor offers to provide as part of the Contract resulting from the ITN that is either not required to be provided in the ITN or RBAFO or clearly exceeds the minimum requirements of required service. The Respondent shall provide a detailed description of each value-added service, system and/or equipment functionality, in narrative form. If included in the Contractor's BAFO and accepted by the Department, "Valued-Added Services" shall be provided as part of the contracted service at no additional cost to the Department and with minimal impact to family and friends.

Read, agreed, and will comply. CenturyLink remains committed to providing the value-added services detailed in section 3.1 of our original response, and reiterates its commitment to provide any of those services if desired by the Department.

For brevity and to maintain the file size of this document for electronic delivery, we have provided the summary table of these services contained in our original response. Because some of those services were requested in this RBAFO, we have added a comment column for notation.

SUMMARY OF VALUE-ADDED FEATURES

Value-Added Functionality – No Cost to the Department, Inmates, or Friends & Family			
Feature	**Benefit**	**Description**	**Comment**
(1) Inmate Medical Scheduling	• Reduced staff time	Inmates can schedule appointments over the phone using automated prompts. Inmates select medical appointment times over the phone and receive messages back when times are confirmed.	Included in section B – additional negotiated services
(2) Inmate Information Line and "Message of the Day"	• Reduced staff time • Enhanced inmate welfare	Inmates are able to track appointment, parole, court, and release dates, in addition to commissary balances and other routine information.	Included in section B – additional negotiated services
(3) Grievance Hotline	• Reduced staff time	Should the Department implement CenturyLink's PAN Auto-enrollment process, synergies would allow us to add a Grievance hotline feature to the ITS	Included in section B – additional negotiated services
(4) Friend & Family IVR	• Reduced Staff workload	Routine announcements such as visiting times, release dates, etc. can be handled by an IVR, eliminating staff time required to answer phones.	Available throughout the contract at no cost

(5) Emergency Auto-Dialer	• Reduced staff workload • Better communications with inmate friends &family	CenturyLink has the capability, on fairly short notice to generate a calling campaign to provide general information to friends and family. For example, if a disaster at a facility (fire, flood) that causes the ITS to no longer function, a automated calling campaign could provide a status to all members of an inmate's PAN	Available throughout the contract at no cost
(6) Data Detective	• Increased investigative capabilities	Data Detective works with CenturyLink's inmate E-mail and photo offerings. The system automatically identifies key words and phrases, and reports connections with other inmates and those on the outside.	Available throughout the contract at no cost
7) PAN Auto-Enrollment	• Eliminate paper PAN forms • Ensure verification of associated name and address for investigative purposes	By augmenting staff to our existing PAN verification center in Rocky Mount, NC, CenturyLink offers to take over the paper-based process managed by the Department, providing name and address information for each PAN prior to allowing inmate calls to that number	Available throughout the contract at no cost
8) Data Sharing with Florida Counties	• Increased staff efficiency • Potential reduction of criminal activity	For those counties that share the same ITS platform as the Department, mutual arranges could be made to give investigators from the counties and the Department mutual authority to listen to recordings and view data. As both entities would be using the same ITS platform, there would be no additional training required.	Available throughout the contract at no cost
(9) Additional Investigative Assistance (Includes Access to Additional Reverse Lookup Databases)	• Increased staff efficiency • Potential reduction of criminal activity	Name and address information for all approved numbers provided in multiple locations, including simple "hot-link" from call record reporting screens. Exclusive access to Local Exchange Routing Guide (LERG) – provides carrier information and subpoena contacts for phone numbers.	Inherent part of CenturyLink service program
(10) ITS Training Video	• Reduced staff time • Consistent instructions to inmates	CenturyLink has an in-house video development group and can produce a video tailored to the Department on the features of the ITS, which can be used at the intake facilities to familiarize the inmates with the ITS.	Available throughout the contract at no cost

(11) Phone-Based Commissary Ordering	• Reduced staff time • Reduced paperwork	Should the Department wish to investigate alternatives to their existing processes, CenturyLink can provide detailed information on this feature. Commissary items can be ordered and prepackaged for pickup or delivery.	Available throughout the contract at no cost

Value-Added Functionality – No Cost to the Department / Funded by Fees Inmates or Friends & Family			
Feature	**Benefit**	**Description**	**Comment**
(12) Video Visitation	• Reduced staff time • Vehicle for inmate debit account refunds	Video Visitation with either facility-controlled scheduling or inmate-controlled scheduling. CenturyLink would recommend a pilot at one facility to evaluate the concept by the Department.	Included in section B – additional negotiated services
(13) Inmate Voicemail	• Increased communication with family • Revenue source	Standard inbound voicemail from family members to inmates, maintaining security controls	Included in section B – additional negotiated services
(14) Inmate E-Mail	• Reduced contraband • Reduced staff workload • Improved investigative capabilities • All messages retained • Faster inmate/family communication	Incoming email processed through Data Detective. Potential to integrate download using an inmate kiosk. Two-way feature available to allow inmate to respond to sender.	Available throughout the contract at no cost
(15) Inmate Electronic Photo Delivery	• Reduced contraband • Reduced staff workload • Improved investigative capabilities • All messages retained • Faster inmate/family communication	Up to 36 photos can be reviewed on-line quickly by staff. Photos can be printed or potentially sent to inmate kiosk Data Detective integration.	Available throughout the contract at no cost

Primary Contact: Victoria Johnson
victoria.l.johnson @centurylink.com | 850.212.8880

Value-Added Functionality – Impacts Commission Offer to the Department and/or Calling Rates to Inmates & Friends/Family Members			
Feature	**Benefit**	**Description**	**Comment**
(16) Voice Biometrics (continuous throughout the call)	• Reduced PIN stealing • Helps locate suspicious behavior, including biometric identification of 3-way calls • Biometric officer check-in available	This offering (Investigator Pro) allows *continuous* voice biometrics (as opposed to a random check throughout the call), and provides enhanced tools for investigators.	Included in section B – additional negotiated services

D. EVALUATION PROCESS INFORMATION

Phase 8 - Best and Final Offers

Respondents will be asked to submit to the Department their Best and Final Offer in accordance with revised specifications, if applicable, as set forth in the Department's Request for Best and Final Offers. The vendors' Best and Final Offers shall contain the best pricing option the vendor is prepared to offer as specified in Section A, Pricing, however, after submission of Best and Final Offers, the Department reserves the right to clarify any element of required service or further negotiate pricing with a single or all qualified respondents prior to final award. After receipt of BAFO's, the Negotiation Team will prepare a summary report of negotiations and enter a recommendation as to which respondent provides the best value to the state. Award will be made in compliance with Section 287.057 (3) (b), Florida Statutes.

Read and understood.

E. BEST AND FINAL OFFER RESPONSE INSTRUCTIONS

Responses to this Request for Best and Final Offer shall be received no later than close of business (5:00 p.m. ET), Tuesday, June 18, 2013. Responses may be emailed (preferred), faxed or sent hard copy sent via mail. If submitting via email, please submit to hussey.julyn@mail.dc.state.fl.us with a cc to wright.kelly@mail.dc.state.fl.us. Faxed responses may be sent to 850-488-7189

Read and understood.

F. SIGNED STATEMENT OF ACCEPTANCE OF MINIMUM SPECIFICATIONS, TERMS AND CONDITIONS AND FINAL CONTRACT

The Respondent shall include a signed statement acknowledging acceptance of the minimum specifications and their intent to comply with all terms and conditions indicated in the ITN, Respondent's Initial Response, the Request for Best and Final Offer and Respondent's Best and Final Offer.

When a contract is established between the Department and the successful Respondent, the ITN, the Initial Response to the ITN, the Request for Best and Final Offer and the Respondent's BAFO shall be incorporated into and thereby become a part of that contract. If there is a conflict in language, the Department's contract will govern.

Respondent Embarq Payphone Services, Inc. dba CenturyLink ("CenturyLink") has read, agreed, and will comply with all requirements as stated in this section F. In addition, CenturyLink acknowledges receipt and its agreement to comply with the Department's response to the two subsequent vendor questions:

Q#1 received 6/17/2013 from Kelly Wright:

QUESTION:

Section A. Pricing/Cost Proposal

1. Please confirm the Department is seeking a Blended Telephone Rate for All Calls inclusive of all surcharges stated as a cost per minute in this section.

ANSWER:

In this Section, the Department is seeking a Blended Telephone Rate per minute inclusive of all surcharges.

Q#2 received 6/18/2013 from Kelly Wright:

QUESTION:

Page 10 sec 2.6 of ITN states that Commissions are calculated as a % of gross revenues as reported within the CDR's. Therefore we assume all proposed per minute rates, including those associated with Value Added Services in Section C of the RBAFO, must be commissionable and not proposed as non-commissionable adjustments?

ANSWER:

Correct. Revenue shall be paid to the Department in accordance with section 2.6 of the ITN.

Respondent: **Embarq Payphone Services, Inc. dba CenturyLink**

Authorized Representative Acknowledging Acceptance: **Paul Cooper, General Manager**

Signature of Authorized Representative:

Date of Signed Acknowledgement: **6/18/2013**

ATTACHMENT 1

CenturyLink is pleased to offer this Cost Proposal for Additional Negotiated Services. Please also see explanatory notes below.

Additional Negotiated Services Cost Proposal					
				VIDEO VISITATION ONLY	
Additional Negotiated Services Requested	Additional Charge Per Minute to Blended Telephone Rate Proposed * (i.e. $.01 increase)	"To Connect" Surcharge** (i.e. $.25 per call)	Percentage Change to Department Commission Rate Proposed*** (i.e. 2% reduction)	Blended Video Visitation Per Minute Rate Proposed (inclusive of surcharges)	Department Commission % Rate Proposed
1.) Video Visitation (5 pilot sites)				**$0.50/minute**	**20.0%**
2.) Free Calls	**NC**	**NC**	**NC**		
3.) Forensic Extraction Options	**NC**	**NC**	**0.11% reduction[1]**		
4.) Investigative Function	**NC**	**NC**	**0.30% reduction[2]**		
5.) Cell Phone Detection	**NC**	**NC**	**0.23% reduction[3]**		
6.) IVR Scheduling	**NC**	**NC**	**NC**		
7.) Continuous Voice Biometrics	**$0.023 increase[4]**	**NC**	**NC**		
8.) Inmate Voice Mail	**NC**	**$0.75/call[5]**	**NC**		
9.) Ability to search calls by Keywords	**$.006 increase[6]**	**NC**	**NC**		
10.) Capability to capture inmate to inmate telephone communications	**NC**	**NC**	**NC**		
11.) Location Based Services (cell phones called)	**NC**	**$0.11 per call[7]**	**NC**		

*If no additional charge per minute is being proposed respondent must indicate NC (no charge)

**If no surcharge is being proposed respondent must indicate NC (no charge)

***If no change to initial department commission rate is being proposed respondent must indicate NC (no change)

1. Includes six (6) units along with a dedicated computer for each unit. More units may be negotiated at the Department's discretion.
2. Investigative software is available at no impact to the Department. Commission reduction is to fund the additional associate – with competitive salary and benefits – to assist the Department. More personnel may be negotiated at the Department's discretion.
3. Includes twenty (20) units. More units may be negotiated at the Department's discretion.
4. Alternatively, continuous voice biometrics could be funded by an 8.0 percentage point decrease to commissions. As an alternative, if the additional charge could be treated as non-commissionable (which we understand is not consistent with rules as stated), the additional per-minute rate could be reduced to $0.008.
5. Note this is a per-call charge to friends and family send a voicemail to an inmate, NOT a surcharge to all inmate phone calls if the service were implemented.
6. If this additional charge could be treated as non-commissionable (which we understand is not consistent with rules as stated), the additional per-minute rate could be reduced to $0.002.
7. If this additional charge could be treated as non-commissionable (which we understand is not consistent with rules as stated), the additional per-call surcharge could be reduced to $0.05 per call.

EXHIBIT C

Transmittal Letter

June 18, 2013

Department of Corrections
Attn: Julyn Hussey, Procurement Manager
Bureau of Procurement and Supply
501 South Calhoun Street
Tallahassee, Florida 32399-2500
Phone: (850) 717-3679

Re: RBAFO for Statewide Telephone Services - ITN #12-DC-8396

Dear Ms. Hussey,

Securus is pleased to have the opportunity to provide our response to your request to enter into competitive negotiations and to provide additional information for this Request for Proposal. We acknowledge acceptance of the minimum specifications and it is our intent to comply with all terms and conditions indicated in the ITN, our initial response, the Request for Best and Final Offer, and our Best and Final Offer to the Department.

Securus has responded to each and every one of the additional services the Department has requested with a comprehensive approach, which we believe provides the best value to the Department. Our operational efficiencies enable Securus to aggressively address your requirement for both low rates and high commissions, in fact, we project that the Department will benefit from a thirty percent (30%) increase in inmate calling based upon our experience with similar rate reductions.

Securus looks forward to additional discussions with the Department and the opportunity to demonstrate our proposed technologies when appropriate.

Please do not hesitate to contact me or Bryan Carrell, System Administrator at any time you require additional information from Securus. Mr. Carrell can be reached by telephone (850) 893-6921 or by email at bcarrell@securustech.net.

Sincerely,

Robert E. Pickens, Chief Operating Officer
Securus Technologies, Inc.
14651 Dallas Parkway, Suite 600, Dallas, Texas 75254
972-277-0300
bpickens@securustech.net

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RBAFO – ITN #12-DC-8396

This is the Request for Best and Final Offer (RBAFO) in response to negotiations with three (3) respondents to the Department's ITN# 12-DC-8396. This RBAFO contains Pricing, Additional Negotiated Services, and Value Added Services as discussed during negotiation and outlined below. The other specifications of the original ITN, unless modified in the RBAFO, remain in effect. Respondents are cautioned to clearly read the entire RBAFO for all revisions and changes to the original ITN and any addenda to specifications, which are incorporated herein and made part of this RBAFO document.

Unless otherwise modified in this Request for Best and Final Offer, the initial requirements as set forth in the Department's Invitation to Negotiate document and any addenda issued thereto have not been revised and remain as previously indicated. Additionally, to the extent that portions of the ITN have not been revised or changed, the previous reply / initial reply provided to the Department will remain in effect.

A. PRICING

The Respondent shall provide their Best and Final Offer for rates on the below Cost Proposal Table. Costs should be submitted with the most favorable terms the Respondent can offer.

NOTE: Blended Telephone Rates for family and friends shall not exceed two dollars and ten cents ($2.10) for a fifteen (15) minute call.

The Department is seeking pricing that will provide the best value to the State. The Department desires that the resultant contract generates the highest percentage of revenue for the state and the lowest possible telephone call rate charges for inmate families and friends.

COST PROPOSAL

	INITIAL Contract Term 5 years	ONE Year Renewal	TWO Year Renewal	THREE Year Renewal	FOUR Year Renewal	FIVE Year Renewal
Department Commission % Rate Proposed	46%	75%	75%	75%	75%	75%
Blended Telephone Rate for All Calls* (inclusive of surcharges)	$0.095	$0.095	$0.095	$0.095	$0.095	$0.095

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B. ADDITIONAL NEGOTIATED SERVICES

The Department is interested in the following services that were addressed during negotiations:

The Respondent shall provide a detailed description of each of the below services, systems and/or equipment functionality, in narrative form. If included in the Contractor's BAFO and all, or a portion of, are accepted by the Department, these services shall be provided as part of the contracted service, and at the rates shown in the Cost Proposal (see Attachment 1) submitted in the respondent's BAFO.

- Investigative functions : An Investigative tool with the ability to import external sources of data and at least one (1) dedicated staff person to assist with analyzing investigative data;

Securus will provide our THREADS data analysis investigative tool, giving the Department the ability to easily import external sources of data and one (1) dedicated staff person to assist with analyzing investigative data. The THREADS investigative tool and the investigative staff person were offered at no charge to the Department in the Securus ITN response and will continue to be offered at no charge to the Department in this RBAFO response.

A full description of the THREADS investigative offering and the Florida based Investigative Services Specialist (dedicated staff person) can be found in the Securus ITN response. The key THREADS description begins on page 145 and ends on page 148. The Investigative Services Specialist description is located on page 313.

The next two paragraphs include summary descriptions of THREADS and the Investigative Services Specialist.

Securus' THREADS application is a powerful and easy to use investigative platform providing law enforcement and Corrections customers using SCP with focused leads to drive information led policing. This software analyzes corrections and communications data such as inmate information, call data from SCP, public phone records (obtained through normal legal process), money transfer transactions, cell tower record downloads, data from confiscated cell phones (text messages, emails, calls, contacts, pictures), and called party data including billing name and address, communication history, and much more –to generate focused and targeted investigative leads for investigators.

Florida-Based Investigative Services Specialist

Securus is proposing to provide to the Department a full time Investigative Services Specialist employed by Securus to serve the Department as a new resource to ensure you receive the full incredible benefits of our THREADS application. This person will be provided at no additional cost to the Department. The proposed Investigative Specialist will be thoroughly trained by Securus and Guarded Exchange to work side by side with the Department investigators, on a full-time basis, and will provide daily assistance in running THREADS investigative reports. The proposed Specialist will also be responsible for assisting investigators in integrating THREADS information with ACISS information and ensuring that the THREADS investigative analytical tool is adding value to the Department's investigative staff.

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Securus, along with our partner Guarded Exchange, is pleased to offer increased staffing levels to assist with analyzing investigative data. This offer is in addition to the minimum requirement of at least one (1) dedicated staff person to assist with analyzing investigative data. This enhanced offer includes staffing to monitor approximately two and one half percent (2.5%) of all inmate calls on an annual basis. Department regulations make Wardens responsible for ensuring that staff conducts a minimum of forty (40) hours of monitoring per month. Work release centers are not subject to telephone monitoring. Accordingly, the Department has 101 facilities that require a minimum of 40 hours of monitoring per month, totaling a minimum of 4,040 hours of monitoring. By having Guarded Exchange monitor 2.5% of all inmate calls guarantees that an average of 4,288 hours will be monitored each month, giving Wardens additional options to maximize utilization of existing staff. Options could include keeping Department staff monitoring 4,040 more hours of inmate calling and having staff follow up on actionable intelligence generated from Guarded Exchange monitoring efforts.

Specifically, Guarded Exchange will be responsible for the following:

Provide a sufficient number of personnel to listen to and review a minimum of 2.5% of all offender calls, in their entirety. The 2.5% of offender calls to be monitored will be based on the use of proprietary data mining, behavioral analysis and filtering technologies and other proprietary strategies in conjunction with the intelligence gathering priorities established by the Department. In providing the monitoring and review of offender calls, Securus, through Guarded Exchange, will incorporate any data mining strategies established by the Department. The monitoring will use a combination of technology from Guarded Exchange and Securus and sufficient personnel for the purposes of collecting intelligence from the SCP ITS.

The use of sufficient personnel, strategies, and technologies that will identify at a minimum the following:

- Suspicious or suggestive key words or phrases
- Calls that suggest threats to the safety and security of the facility, staff, volunteers, and inmates entrusted to the care of the Department
- Criminal activity inside and outside of the facility

Upon approval from the Department, Securus will provide Guarded Exchange with the associated interface to access records that will be required to facilitate direct input into the Guarded Exchange proprietary software for the purposes of this solution.

The Guarded Exchange proprietary software also includes the Echo™ Voice Biometric Solution.

Echo is the only continuous voice biometric solution that does not require a resource intensive, formal enrollment process. Instead, biometric voice prints (BVPs) are automatically generated from call recordings and are perpetually improved with each pass through the system, ensuring the highest possible accuracy rate.

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Regardless of whether the speaker is the calling party (inmate) or the called party (civilian), Echo can print and identify speakers on both sides of the call, further enhancing its ability to identify persons of interest.

In addition to identifying speakers who are currently incarcerated (on both sides of the call), Echo is able to analyze calls and identify individuals who have been previously incarcerated such as ex-inmates, parolees, etc., and notify Guarded Exchange monitors of such events.

Further, Echo is able to create voice prints on request; for example, when a suspect is not an inmate and may be reached on numerous telephone numbers (a condition virtually impossible to detect outside of Echo). Once the print is created, the suspect's voice can be searched for through historical calls and added to a watch list for future calls so monitors can be proactively notified of the presence of the speaker in a call, enhancing their ability to extract potential intelligence from the call recording(s).

The Echo system is entirely independent of language, channel, or text: This means the BVP can be generated from any audio source and used to match the speaker in any other channel. For example, audio captured via the inmate telephone system during an investigation can be compared to audio obtained using a microphone during interrogation. Additionally, regardless of what language the BVP is created in, it can be matched to a speaker in any language he may speak, regardless of the words he chooses to use.

To facilitate investigations, the Echo database can be queried by voice, identifying all the calls in which a targeted inmate may have spoken. Much more than this, a voice of a targeted NON-INMATE can also be run against the database giving investigators unparalleled intelligence gathering tools.

Securus will submit all gathered intelligence in a format agreed to by the Department. All gathered intelligence would be submitted to the Department upon discovery.

In addition to the daily and or weekly business meetings with the Office of Inspector General, Securus will also co-chair an account team, consisting of Securus and On-Site Guarded Exchange Analysts. The team will be proactive in meeting with the Department and the Office of Inspector General on a routine basis for the purposes of reviewing the success of the program, making adjustments as necessary, and participating in creative sessions to add to this solution.

Securus and Guarded Exchange are providing these same monitoring services to the Missouri Department of Corrections (MO DOC). Guarded Exchange is monitoring 5% of MO DOC calls, over 8,000 hour per month (twice the amount of hours being proposed in this RBAFO).

Securus encourages the Department to call MO DOC to verify the success of this program. Securus is willing to sponsor a trip for the Evaluation Team members or other designated Department representatives to travel Jefferson City, MO to see a firsthand account of the Guarded Exchange monitoring and operations center (co-located in same building as MO DOC Investigator General).

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Pricing for this enhanced staffing is included in Attachment 1 – Additional Negotiated Services Cost Proposal - Investigative Function.

- Forensic extraction options: Minimum of six (6) Universal Forensic Extraction Devices (Cellbrite or equivalent); and off site examination of data - maintaining a defendable chain of custody;

Securus will provide six (6) Universal Forensic Extraction Devices and off site examination of data while maintaining a defendable chain of custody. Securus proposes to provide the Department with six CelleBrite UFED forensic extraction devices to be delivered to the Department's location(s) of choice.

Utilizing this new technology will result in substantially more rich information available to investigators. CelleBrite and UFED are the recognized leaders in cell phone extraction capabilities; however, not all cell phones are capable of being decrypted with these devices alone. Securus will provide you access to utilize additional tools such as Encase, the leading software-based solution capable of extracting electronic media in addition to cell phones, through your dedicated Investigative Service Specialist working with our partner, Guarded Exchange. Upon extraction, cell phone forensics data will be loaded into THREADS for immediate availability and Departmental access. Information can also be submitted directly to the Department via FTP or other preferred medium. Usage of Securus' Forensic Analysis Program eliminates the need to hire incremental staff to administer such programs being considered for development. Also, through Securus' exclusive partnership with Guarded Exchange, Certified Forensic Examiners are fully trained and available in order to maintain Chain of Custody for evidentiary purposes.

The six CelleBrite UFED forensic extraction devices were offered at no charge to the Department in the Securus ITN response and will continue to be offered at no charge to the Department in this RBAFO response.

Guarded Exchange Forensic Services

Guarded Exchange is fully certified to use the CelleBrite Universal Forensic Extraction Device Touch Ultimate. The CelleBrite UFED Touch Ultimate currently supports physical and logical extraction of over 3000 mobile devices. Guarded Exchange can also provide training and support for directly importing extracted data into the Securus data analysis tool THREADS, for use by Department investigators.

The Department, at its option, can ship confiscated cell phones to the GEX Forensics lab located in Jefferson City, Missouri, using the GEX Chain of Custody protocols. GEX will perform a data extraction of the device at no additional cost to the State. Information recovered, at the Department's option, will be made available via secure FTP site for download, within 3 business days of receipt of the device. The device, along with a certified copy of the extracted information on CD, will be shipped back to the originating location following Chain of Custody protocols.

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Along with the Off-Site examination option, Guarded Exchange will also offer its expertise and assistance to the department for the purpose of developing a Departmental Digital Forensics Unit, if desired.

Guarded Exchange forensic services also has access to numerous industry standard Computer Forensic programs (Encase, Internet Evidence Finder, Passware, Oxygen Phone Forensic Suite, Forensic Explorer) that are also able to perform data extraction on mobile devices as well as Forensic software and hard ware to perform in depth forensic analysis on images/acquired devices as well and any form of digital media, at no additional charge to the State.

Guarded Exchange currently employs CelleBrite UFED Touch certified users as well as a certified Digital Forensic Examiner and Missouri Licensed Private Investigator with over 4 years of experience in the field of data extraction, data analysis and cyber crime.

The combined experience of the Guarded Exchange staff combined with the Industry leading hardware and software would ensure that the highest quality of digital forensic services on mobile and any digital media.

The policies and procedures for maintaining a chain of custody that were approved by the Missouri Attorney General were modified for the private sector and adopted for Guarded Exchange Forensic Services. These polices for chain of custody and data extraction and analysis were tried and tested polices based on Law Enforcement cyber crime programs. These Policies were designed and implemented to maintain strict chain of custody doctrines and maintain them throughout the process from receiving of the evidence, data extraction and return of the evidence. Mobile Device policies and procedures are also based upon industry recognized polices as recommended by CelleBrite. A copy of Guarded Exchange Forensic Services Policies and Procedures, including all forms and documents will be made available to the Department.

Every item received by Guarded Exchange Forensic services in entered into an electronic spreadsheet as well as individually labeled and attached to an Acquired Property form, where custody within the Guarded Exchange offices is maintained and documented. All received evidence is secured in a locked room with access to a signal proof Faraday cage to maintain original data on all evidence.

The Guarded Exchange forensic lab and evidence is a locked, secure room with access limited to staff approved by the Forensics Services Coordinator.

Personnel Training and Staff Education

As well as secure, professional off site data extraction of mobile devices and digital media forensic analysis, Guarded Exchange staff is also available to provide training to Department staff. This training may be provided in house at Department facilities or via a live or prerecorded webinar. Staff will be trained on the correct procedures for securing seized mobile devices or other digital media so as to ensure the integrity of the device and any contained evidence. Staff will also be trained on correct packing and shipping procedures for seized/recovered mobile devices or other digital media.

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Guarded Exchange is also partnered with H11 Digital Forensics to provide CelleBrite UFED Certification Training to select staff at an approved Department training location. Guarded Exchange will provide a week long Certification Class to be conducted by H-11 for up to 9 Department staff at a Department training facility of the Departments choice.

Certified CelleBrite Training Courses and Cell Phone Forensics

These certified CelleBrite training courses begin with the core components of the CelleBrite UFED Ultimate system and advance for comprehensive mobile device forensic examinations. Participants will learn how to perform the following extractions: Logical, File System, Passcode Recovery, and Physical. These CelleBrite training courses are not a glorified repeat of the user guide or merely imaging lots of phones. The H-11 Certified CelleBrite training courses are engineered, updated, and modeled for those cell phone forensic examiners who want to learn sound methodologies and comprehensive skills. Participants will learn proper extraction processes, how to read HEX dumps, PDU encoding, and specialized techniques to better utilize the CelleBrite UFED Ultimate & CHINEX systems to their full potential and capabilities.

- Video visitation: Pilot program at five (5) facilities, identified by the Department, with an option for statewide implementation, at the Department's discretion.

Securus will provide a Video Visitation Pilot program at five (5) facilities, identified by the Department, with an option for statewide implementation, at the Department's discretion.

During the pilot program Securus will work with the Department to help develop policy and procedures for a potential roll out of a statewide solution. A successful pilot should generate sufficient volumes of paid visitations; an average of one visit per inmate per month is the norm for a successful pilot. Securus proposes to provide the Department with this statewide Securus Video Visitation Services at no cost to the Department.

The price for visitors using the system and proposed commission rate to the Department is identified in Attachment 1. – Additional Negotiated Services Cost Proposal - Video Visitation (5 pilot sites).

This new service can provide the Department with additional revenues through new commissions as well as positively contribute to the Department goal of reducing recidivism. The deployment of Securus Video Visitation will also have a positive impact on friends and family members who can now conduct a visit from their home instead of traveling across the state of Florida or even from outside of the state. Similarly, families who struggle to afford to travel to prisons for visits will now have a way to communicate with inmates without incurring the cost of hotel rooms, fuel costs and tolls.

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All video visitation sessions can be monitored and recorded, providing a video record of the visit. All visits can be immediately terminated by supervisor staff during visit if necessary.

The Securus Video Visitation system enables you to conduct visitations safely, securely, and with fewer burdens on facility staff. This advanced solution provides the Department with multiple benefits, including:

- Enhance facility security by reducing the possibility of inmate confrontation
- Enhance facility operations by reducing transport of inmates
- Improve the ability of the inmate to communicate with legal representation//family, and any other persons authorized by the Department administration
- Reduce contraband infiltration
- Reduce inmate and visitor movement through a facility
- Increase security for visitors
- Increase inmate and visitor morale with increased opportunities to visit
- Reduce man-hours needed to escort inmates and visitors to visiting areas
- Generate income for the facility as a shared revenue producer

The Securus Video Visitation solution is a centralized system, similar to the SCP system, that allows automatic technology and feature upgrades. After the system has been implemented, it is easy for Securus to enable new features and modules by activating the feature in the centralized system.

How it Works

The Securus Video Visitation solution allows user fees to be assessed and collected by the system. As friends and family or members of the public elect to conduct remote visitation sessions, they pay for the visit on a per-session basis.

Inmates' friend and family members access a simple website via the Internet, designed with the look and feel of access to other Securus services. The inmate's friend or family member schedules and pays for a video-visitation session by going to www.securustech.net website.

Using the video visitation website, they can select the facility and inmate they wish to participate in the video visitation session. The scheduling application automatically schedules visits according to the housing location of the inmate in the facility, which terminals are available to that specific housing location, and available times for video visitations to be held. Fees are accessed and collected at the time the visit is scheduled via credit or debit card.

At-Home (Remote) Video Visitation

This method allows remote visitors, such as friends and family, probation officers, and attorneys to securely communicate with inmates from outside the facility via a broadband Internet connection.

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Remote visitors access Securus Video Visitation through the www.securustech.net website. The visitor selects the facility and inmate they would like to visit. The visitor is able to do the following:

- Create, edit, and/or delete scheduled video sessions with inmates
- Pay for the scheduled session with a credit or debit card
- Start sessions with inmates (no officer intervention required)

Remote users will need to use personal computer or laptop with a built-in or exterior USB camera, a microphone and speakers, or a headset.

Securus Video Visitation is a **100 percent** Web-based video visitation and integrated inmate kiosk solution specifically designed for correctional facilities.

Our video visitation service provides Securus clients the very best in video visitation without the burden and costs of managing the system. We maintain the video visitation system 24 hours a day, 7 days a week, 365 days a year. The Department benefits from a quality of service that is fast, accessible, and secure.

- Free Calls: In 5, 10 and 15 minute increments. Calls will be authorized at the Department's discretion.

Securus proposes to provide 10,000 free calls annually at no charge to the Department for the purposes of free inmate calling. During the Negotiation session, there we very good reasons given for the need to allow for free calling. Securus believes that 10,000 free calls on an annual basis will give the Department the flexibility needed to accomplish its goals. Securus will set up an account for each inmate in which the Department may authorize free calling in increments of 5, 10 or 15 minutes. The calls may be placed on the inmate's accounts directly by an authorized Department official or the request to add time to an account may be emailed to Securus and the call will be credited to the inmates free call account.

Pricing for Free Calls is included in Attachment 1 – Additional Negotiated Services Cost Proposal - Free Calls.

Securus will also provide the ability to use this free call allowance to designate certain called numbers as a free call.

Authorized Department staff can add numbers to the free call list through the SCP user interface, as shown in the following figure:

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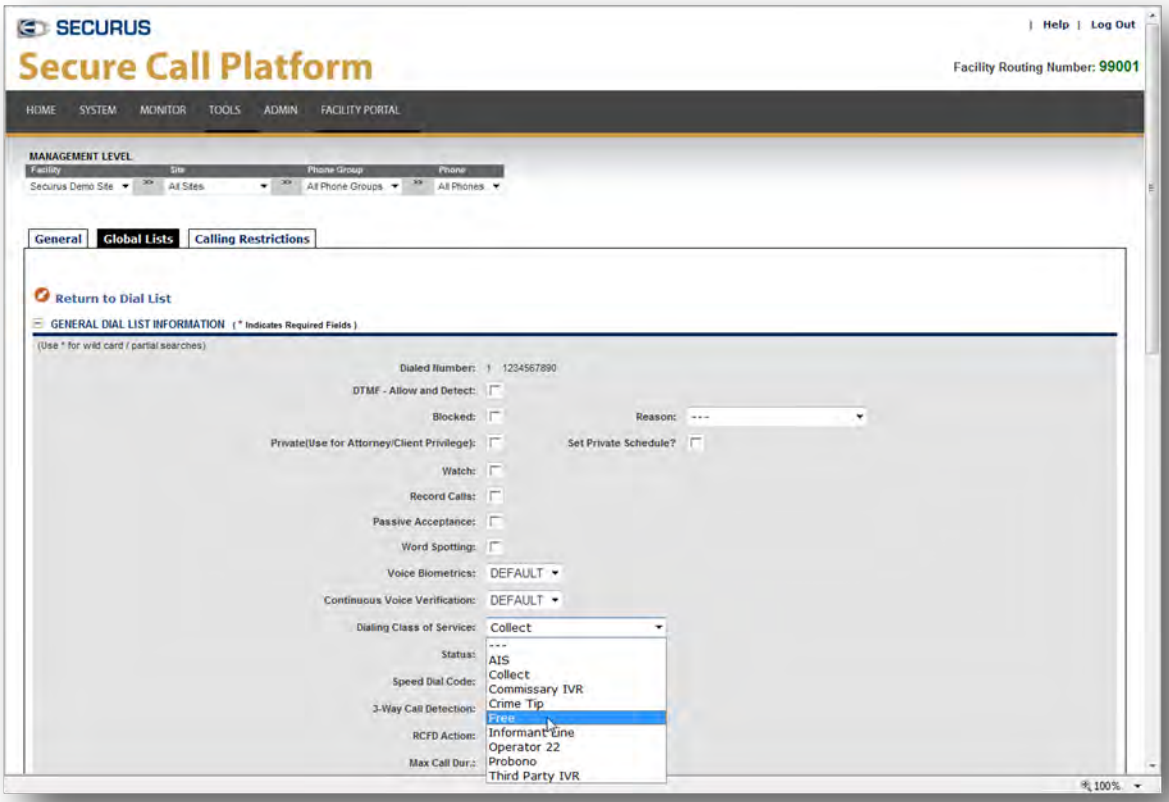
Configuring Free Calls

Proprietary and Confidential



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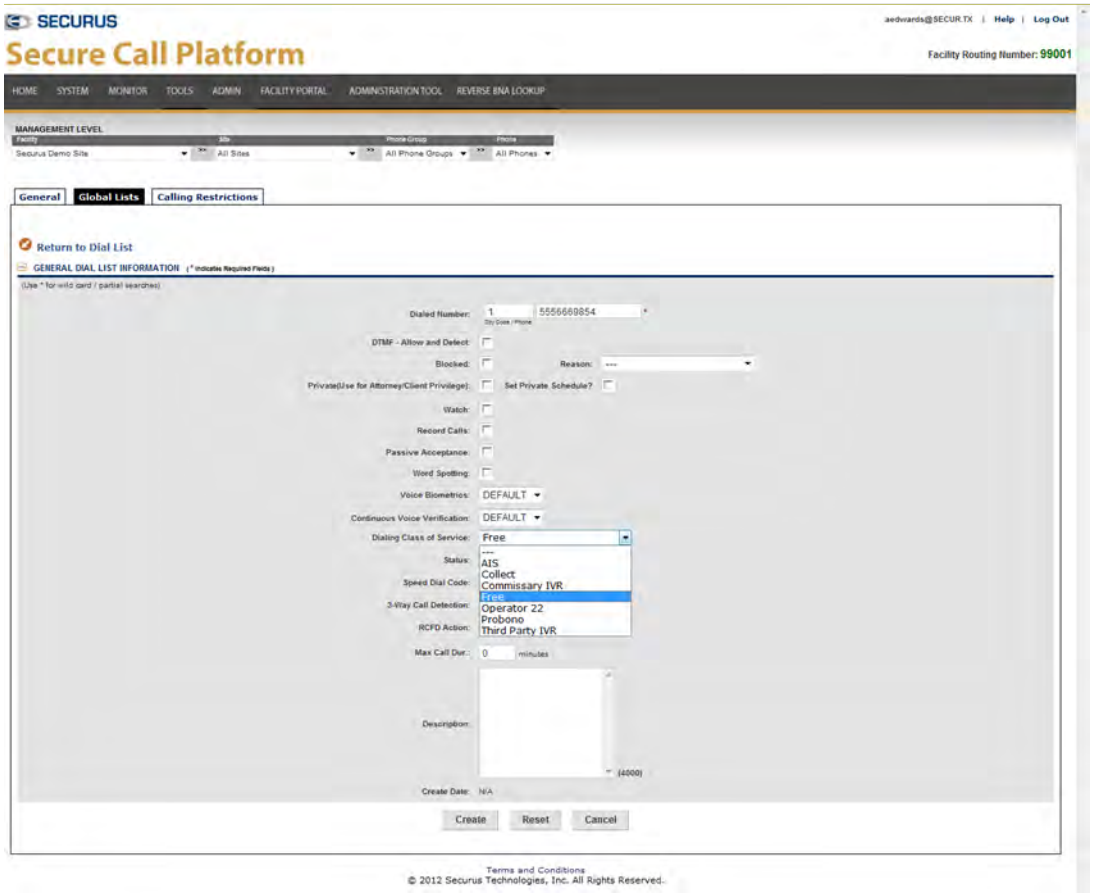
Free by Dialed Phone Number

Any phone number can be set up as "Free" with appropriate permissions, through the global list. The following screen shot identifies how an authorized user can set the phone number with a Free dialing class of service.

Setting Free Calls in Global Lists

Proprietary and Confidential



- Cell phone detection: Minimum of 15 detection units (cellsense or equivalent).

Securus is proposing the deployment of 15 MetraSens CellSense full body scanning units across the State at no cost to the Department. The 15 MetraSens CellSense devices were offered at no charge to the Department in the Securus ITN response and will continue to be offered at no charge to the Department in this RBAFO response.

Securus is also offering through the Additional Negotiated Services process to provide the Department with another 115 CellSense devices.

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Pricing for these additional 115 units is included in Attachment 1 – Additional Negotiated Services Cost Proposal - Cell Phone Detection.

Immediately upon execution of a contract with the Department, Securus will place the order to purchase the Cellsense units on behalf of the Department. These units are being offered to address the growing issue of cell phone proliferation within prisons and we believe they have the potential to be a critical perimeter-based first step in assisting the Department with identification of contraband cell phones in your facilities. These units will be shipped directly to the locations designated by the Department and can be immediately operational.

Cellsense is a proven, highly effective system that detects all cell phones even when they are switched off and with or without batteries. Modern cell phones increasingly contain minimal amounts of metal and conventional archway metal detectors struggle to detect them. Cellsense detects essential cell phone components and the human body is unable to mask the presence of cell phones to Cellsense so that internally inserted cell phones are readily detected.

Cellsense is capable of scanning large numbers of inmates in a short time, much quicker than utilizing hand wands. It's innovative technology and portability allows it to be deployed anywhere in the prison and set up in less than one minute.

- Interactive Voice Response (IVR) scheduling: appointments, grievances etc.

Securus uses the services of Telerus to provide our inmate Interactive Voice Response capabilities using its Automated Information Services (AIS) 2.0. Securus will provide the services described below for the price provided in Attachment 1 – Additional Negotiated Services Cost Proposal - Cell Phone Detection.

The IVR offering is a robust offering which handled more than 6.5 million interactions over the last year with a very efficient average session time of one minute and twenty two seconds.

Automated Information Services is the industry's first and only hosted interactive voice response (IVR) system that automatically provides general facility information and inmate-specific information to inmates over the phone. All of this functionality is automatically available around the clock, so that inmates can always get the information they need when they need it.

Examples of information that AIS can automate information, such as:

- Court Dates, Times, and Locations
- Projected Release Date
- Commissary Balance
- Visitation Eligibility
- General Scheduling
- Grievance Processing
- Setting and Managing Appointments

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AIS provides unmatched secure access into facility and inmate information. This information is pulled from a facility's various Management Information Systems (MIS) including the Department's management system every 15 minutes. The service offers an English and Spanish interface, text-to-speech playback of inmate names, and touchtone and speech recognition interface.

The proposed IVR will be custom designed to provide for all the inmate information the Department is able to make available to the AIS system which can be accomplished using IVR technology. The following is a typical implementation schedule for turning up our AIS system:

AIS Preliminary Project Plan

Milestone	Description	Participant(s)	Completion Target
Execution of Agreements	Identification of Needs and Requirement	Securus/Telerus, Facility	Week 1
Site Configuration Document	Project "blueprint" including Scripts, Flow Charts, Data Requirements, Sign-off by facility.	Securus/Telerus, Facility	First Draft: Week 2 Final: Week 3
Test Plan	Plan provided to your facility with all Use Cases and Test Data requirements identified.	Securus/Telerus, Facility	Week 3
Core Development	Application Programming, FTP configuration, Voice File Recording.	Securus/Telerus	Week 6
Quality Assurance	Execution of Test Plan, Load testing, Voice Files Double-Checked, Bugs Resolved.	Securus/Telerus	Week 7
User Acceptance Testing	All parties confirm system performs to exact specifications.	Securus/Telerus, Facility	Week 8
Go-Live	Cutover to production architecture; Securus/Telerus Development team available 24/7.	Securus/Telerus, Facility	Week 9

- Continuous Voice Biometrics

Securus has one of the largest base of customers using voice biometric services. Customers in Arizona and Texas represent over 150,000 inmates using the Securus voice biometric service. This service will be provided on all calls at no charge to the Department.

As an option, Securus is also making the Investigator Pro application from JLG available to the Department at a commission reduction of 7%. Pricing for these optional services are detailed in Attachment 1 - Additional Negotiated Services Cost Proposal - Continuous Voice Biometrics.

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Securus has also included a third optional continuous voice biometrics solution (Echo™ Voice Biometric Solution) that was included in the Guarded Exchange proprietary software under the Investigative Functions section above.

- Inmate voice mail: Maximum of thirty (30) seconds for friends, family and staff

Securus is one of the only inmate telecommunication vendors to provide secure voicemail opportunities to the facility. Voicemail provides a new path of communication for the inmates, their friends and family members, and attorneys. In addition to communication options, it provides investigative opportunities. This service will be provided at the price provided on Attachment 1 - Additional Negotiated Services Cost Proposal – Inmate Voice Mail, with a maximum of 10 messages per month per inmate. Additional messages can be made upon mutual agreement.

Securus' Voice Mail has the capability for two-way messages, meaning the inmate can leave messages for site administrators, corrections officers, their attorneys, or friends and family, and receive a response by voice mail. This benefits inmates and other involved parties because it allows communication even when the called party isn't at the phone to receive the call.

Voice Mail

In the past, facilities have hesitated to offer a voice messaging system because of the lack of system capabilities and security concerns. Accordingly, one-way telephone calls are still the primary form of communication. If a call is placed and the called party does not answer, communication is not possible and the call is terminated.

Limited communication options have caused complaints to be filed by inmates and friends and family members resulting in increases in staff labor due to the handling of complaints, as well as a reduction in facility operational efficiencies due to the loss of contact availability.

How It Works

Securus has simplified the process for using Voice Mail. Any caller that has a Voice Mail account with the existing platform can leave a voice message. Messages can be left for individual inmates or multiple inmates in multiple facilities. Using their existing PIN, inmates can retrieve Voice Mail's on the SCP system.

System Security

Since messaging runs on Securus' SCP, facilities have the same control of recording and monitoring as with their inmate telephone system. Only the inmate, the sender, and approved facility personnel can access Voice Mail messages.

Increased Investigating Capabilities

Messaging provides investigators with the same recording and monitoring capabilities as any call. However, with friends and family member's new capability to call and leave a message, investigative possibilities are increased substantially

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- Ability to search calls by keywords.

Securus is proposing to provide Word Spotting application which provides the ability to search for keywords at no charge to the Department. The Securus Word Spotting solution was developed specifically for the corrections environment. Securus built and tested this technology in our development lab using actual calls placed by inmates with feedback and direction from real investigators. This approach ensures that the Department will be using an investigative tool to compliment the other investigative suite of services provided by Securus. This includes the potential of incorporating Word Spotting into the suite of investigative tools for Guarded Exchange monitoring services.

SCP's Word Spotting features include the following components:

The default dictionary has more than 7,500 search words, which can be customized to meet the facility's needs, including slang and jargon not found in standard dictionaries.

As security threat groups expand their code word vocabulary and new intelligence is gained, new keywords can be easily added.

- User-friendly interface where suspicious inmates or phone numbers can be selected for ongoing searches.
- The Word Spotting search engine automatically processes offenders based on their custody account number or based upon a target phone number with no additional involvement from facility staff.
- Integrated reporting that allows users to identify calls where specified keywords were identified.
- Unique feature that allows users to select suspicious recordings from the standard Call Detail
- Report and send them through the search engine with a single mouse click.

- Capability to capture inmate to inmate telephone communications

Securus will capture inmate to inmate telephone communications using the ICER Investigative application for JLG. The ICER technology identifies inmates communicating with other inmates within and between participating facilities, including all of the facilities served by Securus as well as those served by other inmate calling providers in the ICER consortium.

Securus will provide the ICER application at no charge to the Department.

ICER works by creating a "compact biometric model" for each call by collecting voice data points plus call information available from Call Detail Records (CDRs) to generate a "call signature" – which is then compared to other call signatures to determine a match. When an inmate is identified as talking to another inmate ICER generates an automatic email notification.

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- Location based services of called cell phones.

The Securus Location Based Services (LBS) will be provided at 15 facilities at no cost to the Department. LBS was offered at no charge to the Department in the Securus ITN response and will continue to be offered at no charge to the Department in this RBAFO response.

Location Based Services for all other facilities are offered at the price provided on Attachment 1 - Additional Negotiated Services Cost Proposal, - Location Based Services (cell phones called).

The following is a description of Securus' Location Based Service offering featuring GEO Fencing and On-Demand location identification of cell phones.

Customer feedback, from the Department uncovered a need to identify the location of the cell phone an inmate is calling. We took that feedback and worked to develop a solution that went beyond what was requested. With Securus' proprietary Location Based Services (LBS), the Department can determine the true location of a cellular phone that is called by an inmate. LBS will also track the location of the cell phone during the inmate call and identify the distance of the cell phone from the correctional facility. This allows the Department to place a perimeter around all of your facilities and block calls to cell phones if they are located within a certain radius of your facility.

Integrated with SCP, Location-Based Services can:

- Provide the called party's true location at the time of an inmate's call via a link in the Call Detail Record (CDR)
- Set up a "Geo Fence" perimeter around a location to notify investigators when an inmate calls a cell phone that is within the Geo Fence perimeter
- Identify the real-time location, on demand, of a suspect's cell phone (requires appropriate
- warrant/subpoena documentation)

Securus has recognized that Department investigators have had to contact cellular carriers to find the location of cell phones during investigations. This can be time consuming and challenging. Securus addresses this issue by offering as an integrated feature which is now available on our Securus SCP inmate calling platform, our Securus Location Based Services (LBS). With the cooperation of cellular carriers, Securus has developed LBS that will provide the Department with immediate access to identify the location of a cell phone called by an inmate by simply logging into the SCP inmate calling system. This will provide immediate access to our LBS service and the ability to identify the location of the cell phone in question.

With Securus' proprietary Location-Based Services (LBS), the Department can determine the true location of a cellular phone that is called by an inmate. LBS will also track the location of the cell phone during the inmate call and identify the distance for the cell phone from the correctional facility. This allows the Department to place a perimeter around all of

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your facilities and block calls to cell phones if they are located within a certain radius of your facility.

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- Identify the real-time location, on demand, of a suspect's cell phone (requires appropriate
- warrant/subpoena documentation)

With roughly 80 percent of calls being placed from wireless devices nationwide, this presents a tremendous challenge to corrections, law enforcement, and investigators. Securus is the first communications company to offer a product to address this issue with Location Based Services.

SCP's Location Based Services provide correctional facilities, investigators, and law enforcement with the following:

- **Cell phone termination location** at call acceptance and end
- Geo-fence perimeters – or unlimited custom boundaries that allow users to **identify call termination locations within that "fence"**
- Covert alerts that provide **real time notifications of call termination within a geo fence**
- **CDR mapping of call terminations to wireless phones**
- **Real time location identification**
- **On demand location identification**

Reports generated from the CDR contain an icon that identifies calls to a wireless number. Location Based Services provides an additional link that maps the location of a wireless number when the inmate placed the call.

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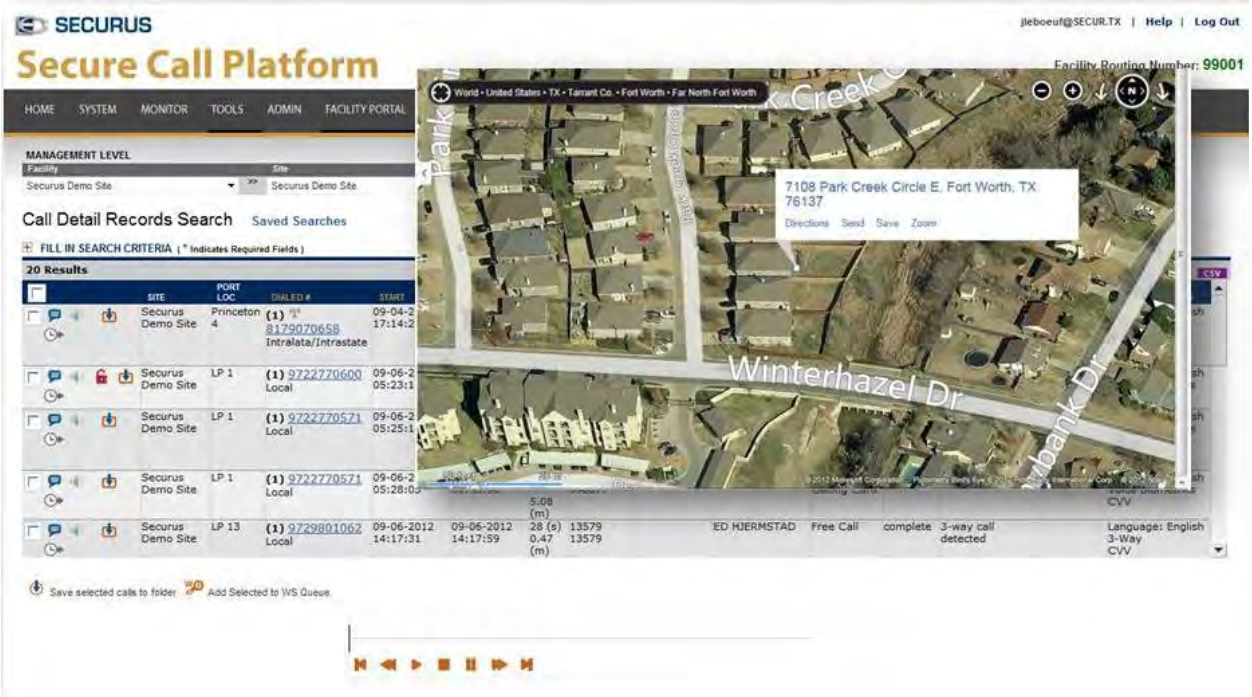
Wireless Location on Call Detail Records Report



GEO Fencing

With Geo Fencing, the Department can set up a perimeter around Department facilities that identifies when an inmate calls a cell phone that is located within that perimeter at the time of the call. Geo Fencing can generate a Covert Alert notification to investigators that allow them to act quickly on real-time information. This valuable capability helps protect your perimeter and is helpful in preventing escape attempts or the introduction of contraband items.

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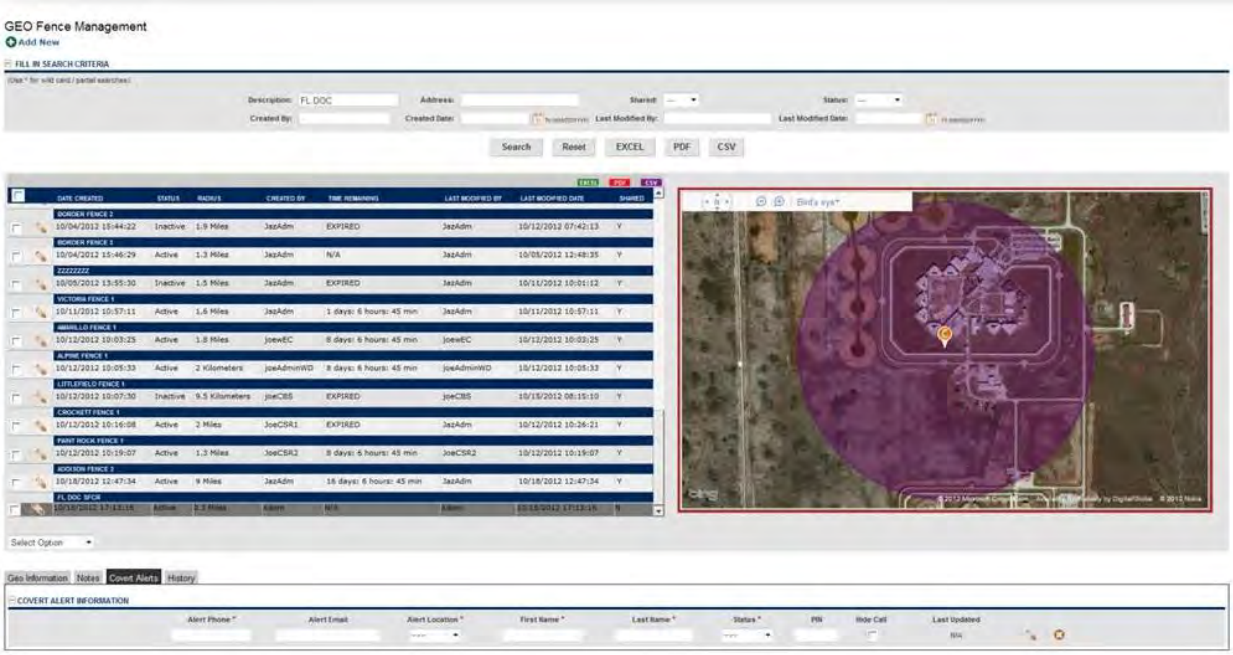
Geo Fence Management



Covert Alert connects a call to an authorized remote number for dialed numbers, phones, inmates PIN, or Geo Fence perimeters that are under surveillance. Authorized personnel can monitor a call from any designated location, while the call is in progress.

The investigator enters a telephone number (such as cellular, home, or office), which is where he or she wants the call sent to for live monitoring. When a call is placed by an inmate that meets the Covert Alert trigger criteria, it automatically routes to the pre-designated investigator phone number(s). A call can be sent to multiple numbers simultaneously allowing several investigators to listen into the call.

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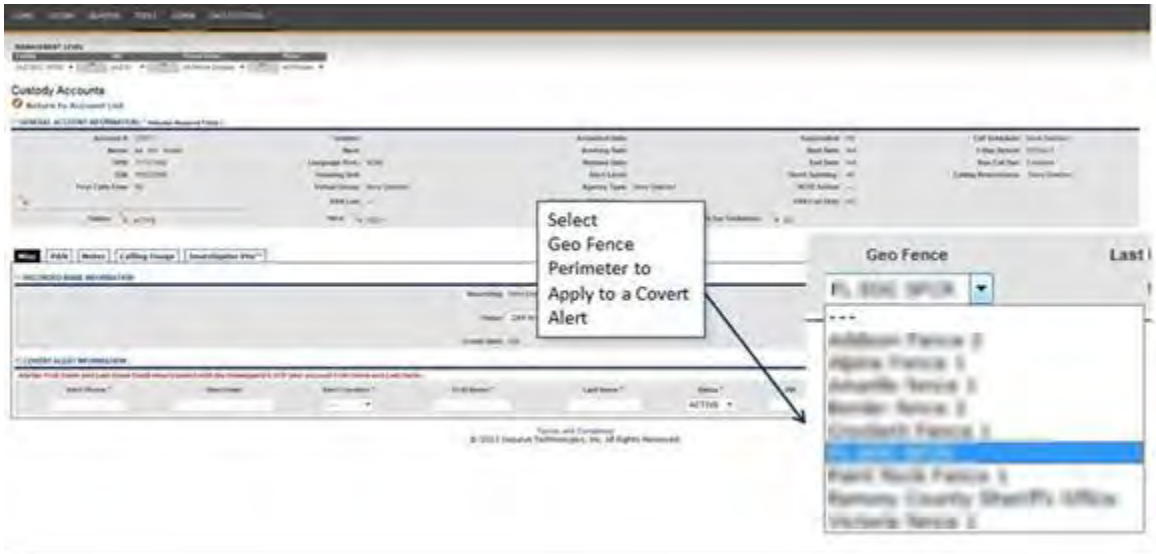
Covert Alert on Geo Fence Perimeter



On Demand - Real-time Location Based Services

On Demand cell phone location identifies the location of a suspect's cell phone, in real-time, regardless of whether a call is in progress. This feature will aid investigators, with appropriate warrant documentation, in locating persons of interest faster and requiring fewer resources.

Location-Based Services

Securus' proprietary Location-Based Services will

- Increase the efficiency of your investigative staff
- Prevent and minimize contraband at your facilities
- Increase the safety and security of your community

No other inmate communications service provider can deliver this kind of identification of call terminations. Without it, corrections officers and law enforcement personnel are left in the dark; not knowing where the calls are being placed as was commonplace with traditional landline telephone service.

- In order to provide the best value to the state, the Department reserves the right to accept or reject any or all of the additional negotiated services.

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C. VALUE-ADDED SERVICES

Value-added services include any services, including additional services that the Contractor offers to provide as part of the Contract resulting from the ITN that is either not required to be provided in the ITN or RBAFO or clearly exceeds the minimum requirements of required service. The Respondent shall provide a detailed description of each value-added service, system and/or equipment functionality, in narrative form. If included in the Contractor's BAFO and accepted by the Department, "Valued-Added Services" shall be provided as part of the contracted service at no additional cost to the Department and with minimal impact to family and friends.

Inmate PAN Automation

Securus currently employs 17 Site Service Representatives dedicated to the Florida Department of Corrections, whose primary function includes daily Personal Allowed Number (PAN) management for inmates. We have re-committed each of the 17 headcount in support of the ITS ITN. However, as technology has evolved the Department may wish to utilize automated technology in order to improve PAN management efficiencies. Currently, correctional staff and paper are required to process inmate PAN requests and updates. Through Securus' Inmate Managed PAN feature the inmate would be able to initiate the PAN request changes via telephone, bypassing the need for paper and correctional officers involvement.

The Securus Inmate Managed PAN application allows inmates to manage phone numbers on their list, such as adding a new number, removing a number, checking the status of a phone number, or hearing, which phone numbers are on their list. When an inmate adds a phone number to their list, the automated system conducts a real time Billing Name and Address (BNA) lookup on the phone number. If a valid BNA is found, the automated system calls the phone number requesting to be added and asks the called party if they wish to be placed on the specific inmates PAN list.

This eliminates Site Service Representative's requirement for manual entry and lookup of BNA creating greater efficiencies and improved overall productivity. Any number which is validated for addition to the inmate's PAN list may still be subject to manual approval should the Department elect to implement a secondary approval process which will be carried out by the Securus Site Service Representative at the direction of the Department.

After the automated PAN system has been in place, if the Department agrees that the efficiencies created have lead to an opportunity to reduce the number of Site Service Representatives, the overall headcount will not be reduced but may be reallocated, with the Department's approval, to programs such as a Security role in support of our proposed Forensic Extraction program. Ultimately, the reassigned role would be conducted at the Department's discretion. The Inmate Managed Pan is available to the Department at no cost and requires little or no training because of the easy to follow voice prompts. The Inmate Managed PAN application is already part of the SCP platform and simply needs to be enabled on the provisioning page by Securus.

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Inmate Debit Calling Accounts

Securus understand that the Department has stated that Inmate Debit Calling is not a service included in this contract.

However because the contract has the potential to run up to ten years, and due to on-going pressures to allow Inmate Debit through the FCC Proposed Rulemaking process, Securus is offering to enable Inmate Debit Calling at any time during the contract. The Department could benefit significantly from the implementation of Inmate Debit Calling. Securus Inmate Debit accounts are inmate-owned phone accounts that allow inmates to fund phone calls to numbers on the Department approved allowed list. Because the calls are funded by the inmate, there is no cost to the called party. An inmate can transfer funds from the commissary system to his Inmate Debit calling account. The inmate initiates the funds transfer from the commissary system to his Inmate Debit calling account at the commissary. The inmate will provide his inmate identification at the point of sale and request the transfer of funds. The transfer amount will be deducted from the inmate's trust or commissary account and added to his Inmate Debit calling account. Debit transactions will include inmate ID and the dollar amount transferred, and will be sent electronically from the commissary to the Securus secure FTP server. The resulting electronic data exchange immediately updates the inmate telephone system to show the inmate identification and amount of debit time added to the phone account (by each inmate).

As an added advantage, Inmate Debit accounts can also be funded by friends and family members. This creates more revenue—inmates can make more calls because they now have additional funds. In addition, unlike traditional prepaid collect accounts, the inmate owns his Inmate Debit account and is not limited to calling only the numbers funded by friends and family members. Inmate Debit accounts increase the inmate calling opportunities, thereby increasing revenue and commissions for the Department

This new calling method will result in increased call volume and additional commission dollars. DOCs across the country have implemented inmate debit and have found that the increased call volume has resulted in more friends and family communication between inmates and outside parties.

Commissary Order by Phone

Securus proposes to provide a unique and time saving feature of our SCP inmate calling system; Commissary Order by Phone. This feature will increase commissary ordering efficiency and at the same time save staff time. Securus' Commissary Order by Phone product provides inmates with the ability to order commissary items using the same inmate telephones used to place calls to friends and family members.

Benefits for Your Facility

This product saves facility staff time processing commissary orders and handling commissary order complaints. Commissary Order by Phone frees up your staff to focus on important activities like safety and security. Orders can be placed when needed by inmates, and as frequently as needed, thereby reducing complaints. Increased sales on commissary items by offering an additional point of sale, may also increase the Department's commissionable revenue.

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Benefits for Inmates

Inmates also benefit from using Commissary Order by Phone. If Department policy permits, Inmates can place orders when they want to, as frequently as they want to without having to wait on facility staff. It is convenient, easy, and accessible.

To place an order using Commissary Order by Phone, inmates can simply go to any inmate telephone and dial a designated number. The call then connects to the commissary's IVR where the inmate can place their order by following the voice prompts and pressing keys on the key pad of the phone.

Benefits for Commissaries

Commissaries also benefit. Our Commissary Order by Phone product opens up another point-of-sale for commissary companies, helping to increase their revenue through the sale of more products and/or through improving inventory turn times as more orders are placed more frequently because it is more convenient for inmates.

Officer Check-In

Securus proposes to provide the Securus Officer Check-In function as a fully integrated feature of our SCP inmate calling platform. This feature will provide the capability for correctional officers to "check in" from any offender telephone without the need for specialized buttons or magnetic wands. Each officer will simply lift the receiver of any inmate telephone; enter his or her unique Officer Check-In PIN and record observations during their rounds to the SCP phone system. At the end of their rounds, the authorized users will have the ability to search Officer Check-In calls, as well as accounts providing exact date and time of entry into each cell location as well as playback of the recorded conversation of any observations during their rounds.

For staff convenience, the Officer Check-In feature is always active regardless if the telephone set is automatically programmed to be off during their rounds. However manual cutoff switches are required to be in the "on" position enabling connectivity between the telephone and the SCP.

SCP is quite flexible in allowing officers to "check in" from any telephone. Each officer is provided a unique PIN as well as a personalized mailbox to record an observation during duty rounds. All information can be obtained simply by generating a report for a single officer PIN or a group of officers by selecting Officer Check-In report module. Once the report is generated, personalized messages can be retrieved by authorized personnel from any workstation with access to the SCP user interface secure Web site. This efficiency enhancing capability provides audit capabilities that help indemnify your facility and provide savings on costs related to stand alone check in systems.

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Re-Entry Assistance

Jobview is a small business based in Minnesota producing software that operates in public access terminals placed in high traffic locations to assist in finding jobs. Jobview has been one of only a few providers of this niche job search service for nearly 20 years. Jobview offers a specific job finding service designed for use in correction re-entry programs.

The financial incentive for prisons utilizing job service is compelling. If only one offender finds a job in three years of using their product, it pays for itself in reduced recidivism costs. Over the past three years, Jobview has grown the Federal Corrections business to now 15 prisons who host our service. This is over 15% of the total federal prison market. In 2012 over 65,000 job search sessions were conducted with the offenders looking at over 450,000 jobs. This service is a success by any measure. Nearly 650,000 people are released from state and federal prisons yearly and far greater numbers re-enter from local jails. Each of them needs a job.

Securus is proposing to make Jobview available to the Department at up to three of its current re-entry centers.

JOBview 2nd Chance gives inmates a 30-60 day head start on finding a job.

Jobview 2nd Chance is a computer terminal or kiosk that allows people returning to the community from prisons to search for statewide and nationwide jobs without direct access to the internet. Jobview 2nd Chance kiosks are "prison-ready" because the user does not have access to a keyboard or to the internet. Job listings are accessed through a secure wireless connection from the kiosk to the Jobview datacenter via a virtual private network. Jobs can only be searched on the kiosk using a touch screen user interface which controls and limits what the user can see and do. Job descriptions, along with job application requirements and instructions, can be printed directly from the kiosk to assist the user with later follow-up. The JOBview program is self-service and requires no user training. The kiosk is ready for use the minute you plug it in.

JOBview 2nd Chance provides access to nearly 2 million job listings. The listings are updated daily so users are always searching current jobs. A "disconnected" version of the kiosk is also available and job listings are updated through a JOBswap media device on a regular basis. A "software only" version of the JOBview 2nd program is available for facilities that already have a secure computing environment that is accessible by inmates.

Inmate Benefits

- Get a 30-60 day head start on a job search
- Browse state and nationwide jobs that are current and updated nightly
- Start thinking about jobs before release; putting their mind on something positive and productive
- See what skills and specific requirements they will face well ahead of release
- Match educational programs they are using to the types of jobs they may be qualified for

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- Practice electronic job searching which is technology they will commonly see upon release
- Job listings of interest can be printed and used for reference after a kiosk session

Correctional Facility Benefits

- No job-seeker training costs because the JOBview 2nd Chance user interface is self-explanatory
- Staff no longer needs to find and print job listings for their transitioning inmates
- Job listings for all types of jobs and levels of experience in cities nationwide
- Turnkey service; Jobview takes care of everything
- No long-term contracts; annual renewal option

TouchPay—Payment Systems and Related Services

TouchPay Payment Systems has existing payment locations within the state of Florida and across the United States that can be used by friends and family members to make payment to the Department.

TouchPay has also developed the interface requirements between Securus and TouchPay for investigations, transactions, customer service, and maintenance purposes.

TouchPay's core competencies, when combined with the Securus capabilities, differentiate us from similar service providers and position us as the industry leader in delivering convenient funding solutions through:

- **Ability to Accept Phone Payments** – TouchPay has a strategic partnership with Securus. Providing it's convenient payment system, including Kiosk-based cash transactions, has proven to drive incremental phone revenues.
- **Ability to Accept Multiple Payments** – In addition to accepting inmate trust deposits, TouchPay can also accept visitation, background check, parole, alternative sentencing, work-release, fines, fees, and any additional payments that would be of value to the Department.
- **Release Cards** – TouchPay's Release Card is available to the Department at no cost, and it would eliminate the need for the Department to issue checks or cash to inmates at release. A PIN number is issued with the Release Card, giving the released offender immediate access to their funds.

Online Payments

TouchPay's online payment-portal accepts Visa and MasterCard credit/debit cards for a variety of transactions. TouchPay provides a secure web-payment server, and our existing infrastructure easily allows additional facilities to be added so they can begin taking payments immediately. Utilizing the existing TouchPay merchant-account network provides instant transaction postings to the Department's back-office reporting system.

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Walk-in Retail Payments

Cash customers can safely and securely make deposits with TouchPay's Walk-in Retail Payment service. In-store deposits can be made at select retailers who participate in the bill-pay network, which provides great convenience for cash depositors.

WellCard Prescription Discount Card

Securus proposes to provide WellCardRX brochures to appropriate Department facilities where they can be distributed to inmates upon release. These small, simple brochures include a prescription card that provides savings of up to 50%, and sometimes more, on quality prescription and health care services for employees, inmates and family members, which inmates can use upon release to purchase prescriptions at a discount.

Securus will provide this without any charge and will provide the Department's inmates with a valuable tool in their ability to assimilate back into the general population, helping improve recidivism rate, and at the same time provide substantial savings to them for prescriptions, lab tests and other medical procedures. Department employees, family and friends will also benefit by enjoying the same benefits.

Facts:

- This is a free prescription discount program for all customers.
- Cardholders receive discounts on more than 60,000 name-brand & generic prescriptions.
- Many nonprescription, specialty and lifestyle medications are also included.
- The overall national average discount is 45%.
- The overall national savings per prescription is $24.25.
- Each month, 24% of cardholders save 70+%.
- The card can be used at over 60,000 pharmacies nationwide.
- The card is accepted by all Major pharmacy chains and 95% of independent pharmacies.
- Cardholders also receive a 50% - 80% discount on lab & imaging tests.

Who does this benefit?

- The uninsured.
- The underinsured.
- Those with Health Savings Accounts (HSA's).
- Those who have high deductibles.
- Those who have not reached their annual deductible.
- Those whose medications are not included in their insurance formularies.
- Those whose insurance benefits do not extend to lifestyle medications.

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- Those whose insurance does not cover prescriptions while they are in another state.
- Those whose insurance does not cover medications for pre-existing conditions.

Eligibility Requirements:

- Everyone.
- No applications, registration, approval process, or waiting periods.
- No restrictions, exclusions, or limitations.
- No one is turned down regardless of age, health, or pre-existing conditions.

Easy to Use:

- Simply present the card and prescription to any participating pharmacy.
- There is nothing to sign, no pre-authorizations, or claim forms.
- There is no expiration date.
- There are no restrictions or limits on how much or often a card is used.
- One card can be used by an entire family.
- All cardholder information is confidential and not sold or used for any other purpose.

D. EVALUATION PROCESS INFORMATION

Phase 8 - Best and Final Offers

Respondents will be asked to submit to the Department their Best and Final Offer in accordance with revised specifications, if applicable, as set forth in the Department's Request for Best and Final Offers. The vendors' Best and Final Offers shall contain the best pricing option the vendor is prepared to offer as specified in Section A, Pricing, however, after submission of Best and Final Offers, the Department reserves the right to clarify any element of required service or further negotiate pricing with a single or all qualified respondents prior to final award. After receipt of BAFO's, the Negotiation Team will prepare a summary report of negotiations and enter a recommendation as to which respondent provides the best value to the state. Award will be made in compliance with Section 287.057 (3) (b), Florida Statutes.

E. BEST AND FINAL OFFER RESPONSE INSTRUCTIONS

Responses to this Request for Best and Final Offer shall be received no later than close of business (5:00 p.m. ET), Tuesday, June 18, 2013. Responses may be emailed (preferred), faxed or sent hard copy sent via mail. If submitting via email, please submit to hussey.julyn@mail.dc.state.fl.us with a cc to wright.kelly@mail.dc.state.fl.us. Faxed responses may be sent to 850-488-7189

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F. SIGNED STATEMENT OF ACCEPTANCE OF MINIMUM SPECIFICATIONS, TERMS AND CONDITIONS AND FINAL CONTRACT

The Respondent shall include a signed statement acknowledging acceptance of the minimum specifications and their intent to comply with all terms and conditions indicated in the ITN, Respondent's Initial Response, the Request for Best and Final Offer and Respondent's Best and Final Offer.

When a contract is established between the Department and the successful Respondent, the ITN, the Initial Response to the ITN, the Request for Best and Final Offer and the Respondent's BAFO shall be incorporated into and thereby become a part of that contract. If there is a conflict in language, the Department's contract will govern.

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ATTACHMENT 1

Additional Negotiated Services Cost Proposal					
Additional Negotiated Services Requested	**Additional Charge Per Minute to Blended Telephone Rate Proposed* (i.e. $/01 increase)**	**"To Connect" Surcharge** (i.e. $.25% per call)**	**Percentage Change to Department Commission Rate Proposed *** (i.e. 2% reduction)**	**Video Visitation Only**	
				Blended Video Visitation Per Minute Rate Proposed (inclusive of surcharges)	**Department Commission % Rate Proposed**
1.) Video Visitation (5 pilot sites)	[redacted]			$1.00	20%
2.) Free Calls	NC	NC	NC	[redacted]	
3.) Forensics Extraction Options	NC	NC	NC		
4.) Investigative Function	NC	$0.25	6% Reduction in Commission		
5.) Cell Phone Detection	$0.003	NC	NC		
6.) IVR Scheduling	$0.003	NC	NC		
7.) Continuous Voice Biometrics	NC	NC	NC for Securus CVV Product; 7%reduction in Commission if FL DOC requests JLG Product		
8.) Inmate Voice Mail	NC	$0.05	NC		
9.) Ability to search calls by Keywords	NC	NC	NC		
10.) Capability to capture inmate to inmate telephone communications	NC	NC	NC		

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11.) Location Based Services (cell phones called)	N/C	$0.05	N/C	[redacted]

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EXHIBIT D

Global Tel*Link Corporation

Executive Offices
12021 Sunset Hills Road
Suite 100
Reston , VA 20190
ph: 703.955.3910
fax: 703.435.0980

Corporate Headquarters
107 St Francis St
32nd Floor
Mobile, AL 36602
ph: 251.338.8859
fax: 251.434.8695

June 18, 2013

Julyn Hussey - Procurement Manager
Department of Corrections
Bureau of Procurement and Supply
501 South Calhoun Street
Tallahassee, Florida 32399-2500

RE: INVITATION TO NEGOTIATE (ITN) FOR – STATEWIDE INMATE TELEPHONE SERVICES
SOLICIATION NO: 12-DC-8396 – Request for Best and Final Offer

Dear Ms. Hussey,

Global Tel*Link (GTL) is pleased to submit our response to ITN #12-DC-8396, for Statewide Inmate Telephone Services to the State of Florida, Department of Corrections Request for Best and Final Offer (RBAFO). We appreciate this opportunity to present our final offer for the Department's requirements and to demonstrate why GTL offers the best value to the State of Florida.

As required by RBAFO Section F., GTL acknowledges the minimum specifications and our intent to comply with all terms and conditions indicated in the ITN, GTL's Initial Response, the Request for Best and Final Offer and GTL's Best and Final Offer. GTL understands when a contract is established between the Department and GTL, the ITN, the Initial Response to the ITN, the Request for Best and Final Offer and GTL's BAFO response, shall be incorporated into and thereby become a part of that contract. If there is a conflict in language, the Department's contract will govern.

We believe we have prepared an overall response which provides the best value to the State Florida, all constituents and users of the inmate telephone system demonstrated as follows

1. 24% reduction in rates, which means more contact with friends and family
2. 41% increase in commissions compared to the current contract
3. 600+ Feature Centralized ITS
4. All New Network Infrastructure and Telephone Equipment
5. Full deployment of Additional Negotiated Services
6. Additional Value Added Services at No Cost to the Department including
    a. Visitation Scheduling Software for All Department Visits, including on-site as well as video visits
    b. Pilot for Wireless Devices for Inmate Education, Re-entry Programs and Secure Communication
    c. $100,000 Annual Technology Grant
    d. JLG Investigator Pro Technology
    e. Debit Calling Option
    f. Call Track – Parolee Monitoring Services

Global Tel*Link Corporation

Executive Offices
12021 Sunset Hills Road
Suite 100
Reston , VA 20190
ph: 703.955.3910
fax: 703.435.0980

Corporate Headquarters
107 St Francis St
32nd Floor
Mobile, AL 36602
ph: 251.338.8859
fax: 251.434.8695

7. Meaningul utilization of certified small, disabled veteran, minority and woman owned business including PRIDE and RESPECT
8. Project Team with unsurpassed DOC experience
9. Upon contract award, GTL will assume the risk of transitioning in less than 80 days, in spite of what other providers may do to delay the transition.

We reiterate our commitment to the Department to transition in 70 days or 10 days less than the ITN requirement.

If any clarification or additional information is needed about our response, GTL will respond immediately to any such request. Please contact your Account Executive, Andrew Merrill, at (916) 698-8343. As an alternative, you may contact Ms. Rae Pearson, our RFP director, at (317) 558-3151.

We are ready to implement our Best Value Solution for the State of Florida Department of Corrections!

Select a Partner with Today's Capabilities AND Tomorrow's Vision: Global Tel*Link.

Sincerely,

Jeffrey B. Haidinger
President and COO

State of Florida

Department of Corrections

REQUEST FOR BEST AND FINAL OFFERS (RBAFO)

FOR

STATEWIDE INMATE TELEPHONE SERVICES

In Reference To
INVITATION TO NEGOTIATE
ITN # 12-DC-8396

RELEASED ON
June 14, 2013

Responses to RBAFO Due By
Close of Business (5:00 p.m. ET) Tuesday, June 18, 2013

BY THE
DEPARTMENT OF CORRECTIONS
BUREAU OF PROCUREMENT AND SUPPLY
501 SOUTH CALHOUN STREET
TALLAHASSEE, FLORIDA 32399-2500
(850) 717-3679
FAX (850) 488-7189

The Florida Department of Corrections has issued this
REQUEST FOR BEST AND FINAL OFFER (RBAFO)
For
STATEWIDE INMATE TELEPHONE SERVICES

This is the Request for Best and Final Offer (RBAFO) in response to negotiations with three (3) respondents to the Department's ITN# 12-DC-8396. This RBAFO contains Pricing, Additional Negotiated Services, and Value Added Services as discussed during negotiation and outlined below. The other specifications of the original ITN, unless modified in the RBAFO, remain in effect. Respondents are cautioned to clearly read the entire RBAFO for all revisions and changes to the original ITN and any addenda to specifications, which are incorporated herein and made part of this RBAFO document.

Unless otherwise modified in this Request for Best and Final Offer, the initial requirements as set forth in the Department's Invitation to Negotiate document and any addenda issued thereto have not been revised and remain as previously indicated. Additionally, to the extent that portions of the ITN have not been revised or changed, the previous reply / initial reply provided to the Department will remain in effect.

A. PRICING

The Respondent shall provide their Best and Final Offer for rates on the below Cost Proposal Table. Costs should be submitted with the most favorable terms the Respondent can offer.

NOTE: Blended Telephone Rates for family and friends shall not exceed two dollars and ten cents ($2.10) for a fifteen (15) minute call.

The Department is seeking pricing that will provide the best value to the State. The Department desires that the resultant contract generates the highest percentage of revenue for the state and the lowest possible telephone call rate charges for inmate families and friends.

GTL Response: GTL's BAFO pricing is reflected below. The blended telephone rate per call represents a 24% discount compared to today's rates while our proposed commission offer will generate an additional 41% in annual commissions in the first 5 years and 52% in the renewal years.

Furthermore, if inmates take advantage of the lower rates and increase the number of calls made per month such that their total spend equals what it is today ($14.5mil/yr), your commission dollars will grow to $9.4mil in the initial term ($14.5M x 65%) or 85% more than you are being paid under the current contract. In the renewal years, this will grow to $10.2mil ($14.5M x 70%) or 100% more than you are being paid under the current contract.

COST PROPOSAL

	INITIAL Contract Term 5 years	ONE Year Renewal	TWO Year Renewal	THREE Year Renewal	FOUR Year Renewal	FIVE Year Renewal
Department Commission % Rate Proposed	**65%**	**70%**	**70%**	**70%**	**70%**	**70%**
Blended Telephone Rate for All Calls* (inclusive of surcharges)	**$0.096**	**$0.096**	**$0.096**	**$0.096**	**$0.096**	**$0.096**

B. ADDITIONAL NEGOTIATED SERVICES

The Department is interested in the following services that were addressed during negotiations:
The Respondent shall provide a detailed description of each of the below services, systems and/or equipment functionality, in narrative form. If included in the Contractor's BAFO and all, or a portion of, are accepted by the Department, these services shall be provided as part of the contracted service, and at the rates shown in the Cost Proposal (see Attachment 1) submitted in the respondent's BAFO.

GTL Response We have provided a detailed narrative for each of the additional negotiated services and additional Value Added services below. In addition to the Additional Negotiated Services and Value Added Services, GTL's core offer includes the following:

- ✓ 600+ Feature Centralized ITS
- ✓ All New ITS Network Infrastructure
- ✓ All New Telephones
- ✓ Unsurpassed DOC Staff Experience
- ✓ Meaningful utilization of certified small, disabled veteran, minority and woman owned business including PRIDE and RESPECT
- ✓ Upon contract award, GTL will assume the risk of transitioning in less than 80 days, in spite of what other providers may do to delay the transition.

- Investigative functions : An Investigative tool with the ability to import external sources of data and at least one (1) dedicated staff person to assist with analyzing investigative data;

GTL Response *"If you can think it, we can link it"*

With the same 'link charting' techniques used in the Boston Marathon Bombing investigations, GTL Data IQ provides the Department with the robust capabilities to analyze data beyond call analytics including the capability to analyze external data in addition to internal data such as the DOC's F.A.S.T system, OBIS, GTL's call data, video visitation, prepaid deposit data and data extracted from the Cellebrite cell phone forensics units. To maximize the power of GTL Data IQ, GTL will provide one dedicated staff person PLUS our staff located in our offices in Lake Butler, FL to assist with analysis regardless of the source of the investigative data. There are no limits to the analytical capabilities of GTL Data IQ: "If you can think it, we can link it".

Florida Department of Law Enforcement and Department of Financial Services

Both the FDLE and DFS are existing users of the underlying technology used to power GTL Data IQ providing the Department with the capability to access additional investigative data. Should the Department need to expand an investigation with the FDLE, investigators for both the Department and the FDLE are already familiar with the use of this technology saving time used for investigations instead of learning a different analytics tool.

GTL Data IQ Investigative Data Sources – Advanced Intelligence Gathering

GTL Data IQ is far more intelligent than other packages that just focus on inmate calling data. Inmates have 'touch points' with the outside through means other than telephone calls. GTL Data IQ was designed with these additional touch points in mind. Its comprehensive data investigation incorporates the following sources of data:

- ✓ Inmate Telephone Calls – **Basic Intelligence**
- ✓ Offender Management System Data – **Advanced Intelligence**
- ✓ Kiosk Data – **Advanced Intelligence**
- ✓ Financial Transaction Data – **Advanced Intelligence**
- ✓ Visitation Data - **Advanced Intelligence**
- ✓ Video Visitation Data – **Advanced Intelligence**
- ✓ Public Information Resources – **Advanced Intelligence**
- ✓ Cellebrite Forensic Cell Phone Data **– Advanced Intelligence**

Additional Information Data Sources: GTL Data IQ provides the Department with a unique investigative resource within the public domain. Within the State of Florida, investigators will be able to pull data from public information data sites across a wide cross section. The following is a partial listing of those public sites available to investigators:

- ✓ HIDTA (pending in Florida)
- ✓ Consumer Finance Businesses
- ✓ DIF Open Fugitives
- ✓ Health Facilities No License
- ✓ Loan Originators
- ✓ Mortgage Brokers and Lenders
- ✓ Retail Installment Sellers
- ✓ Securities Firms

Southwest Border Alliance
Correspondent Lenders
Health Department License
Home Improvement Sellers
Money Transmitters
Motor Vehicle Lenders
Sales Finance Businesses

Data mining technologies allow investigators to uncover *linkages* between telephone numbers and people/organizations to expose complex communication networks, identify investigative targets, and track chronological or sequential calling patterns.

Searching by inmate, depositor, phone number or visitor enables visualization of:

- ✓ Connections between inmates and those making deposits to inmate accounts
- ✓ Phone numbers being called by multiple inmates
- ✓ Visitors visiting multiple inmates
- ✓ Financial transactions made via kiosk
- ✓ Video Visitation system

Closer examination of some links might reveal no untoward activity; for example, a single phone number dialed by multiple inmates might belong to an attorney representing each of those inmates. Other links may provide valuable investigative benefit by revealing patterns and evidence indicative of ongoing criminal enterprise, gang activity and communication with former associates.

GTL Data IQ is one of the most powerful analytical packages available on the marketplace with a specific focus on Law Enforcement and public safety related interests. The system was designed to handle large volumes of data coming from multiple, disparate sources. The unique features of GTL Data IQ enable the Department to easily review and analyze the networks, relationships, and connections associated with their inmate population.

- Forensic extraction options: Minimum of six (6) Universal Forensic Extraction Devices (Cellbrite or equivalent); and off site examination of data - maintaining a defendable chain of custody;

GTL Response GTL is including a minimum of 6 Cellebrite forensic extraction devices with our offer. Off site extraction and examination of data while maintaining a defendable chain of custody is provided via our offices in Lake Butler, FL where our experienced investigative staff will supplement the Department's investigative staff. In addition to the minimum of 6 units to be provided to the Department, GTL will also purchase units to be held at the Lake Butler office for GTL's investigative staff. In addition to assisting with investigations, these units could be used as real-time replacement 'spares' should one of the DOC units fail. In that instance, Lake Butler would deliver the spare unit and have the damaged unit replaced so that investigators lose no productivity in their investigations.

Additionally, GTL offers the Department an annual technology grant, which could be used for additional Cellebrite units. The details of the annual technology grant are detailed in our response to Section C – Value Added Services.

- Video visitation: Pilot program at five (5) facilities, identified by the Department, with an option for statewide implementation, at the Department's discretion.

GTL Response GTL's offer includes a pilot program at five (5) Department facilities, identified by the Department.

GTL's unmatched experience and DOC customer base has given us unique insight into the needs of large State Departments of Corrections. While other providers may have experience implementing video visitation for small population facilities, GTL's video visitation product is the only hardened solution proven in high-volume environments, such as the LA County Jail. The number of visits at LA County alone eclipse those processed by all other video visitation providers combined. When comparing video visitation technology from your finalists, only GTL's video visitation technology has been deployed at a DOC – Colorado DOC.

As the leader in the corrections technology industry, we are confident our **VisManager Video Visitation (VVS)** service is the best solution for the Department.

GTL will provide the Department's needed services for:

- ✓ Complete Turn-Key Solution
- ✓ Web-based system
- ✓ Registering and Scheduling for on-site as well as remote video visits
- ✓ Security
- ✓ System Interface to OMS
- ✓ Staff Access
- ✓ Reporting

Advantages of GTL's Video Visitation Solution

- ✓ Studies and reports continue to support that recidivism can be significantly reduced by regular connection and communications between inmates, families and friends – **13% reduction in felony reconviction and a 25% reduction in technical violations.**
- ✓ Provides family and friends a secure visitation with an inmate, without having to travel long distances.
- ✓ Reduces the possibility of contraband being brought into the facility.
- ✓ The visitation backbone rides on the industry's leading scheduling software that can be used for even face-to-face visits.
- ✓ The granularity of the visitation management software is unmatched by any other offering in corrections, allowing for the most robust and personalized solution for the Department.

Revenue Generation

While the demands of your staff and facility continue to grow, budgets continue to shrink. As a result, correctional facilities have sought out ways to generate revenue to offset costs. Services such as inmate phones, commissary, and inmate deposits have helped to defray costs; but until now, there has not been an effective system to generate revenue from inmate visitation.

GTL's VVS Solution can optionally generate revenue, for example, by charging for *additional visits*; those beyond the number permitted at no cost during a specified time period. You might designate specific days, times of day, or locations for free visits and charge for any other visits. Whether you offer on-premise video visitation, Internet video visitation, face-to-face visitation or a combination of these, our VVS Solution's advanced revenue generation module gives you the option of generating revenue. Unique to our proposed software, GTL's visitation management is the only software that can schedule all types of visits.

VVS Revenue Option Features

- ✓ Generate revenue from internet, on-premise video visitation and/or face-to-face visitation
- ✓ Charge for visits in excess of inmates' "free visit" quotas
- ✓ Charge during specific days or times of the day
- ✓ Charge for specific locations (i.e. downtown visitation center)
- ✓ Set up unique fee structures
- ✓ Create override and refund polices
- ✓ Generate billing reports
- ✓ Automated refunds for inmate releases, movements, etc.

Managed Hosting

Industry leading visitation management without added expenses of servers and IT staff

GTL's hosted VVS Solution eliminates many of the financial barriers that can keep you from implementing a visitation management solution. Managed hosting gives you the same advanced functionality as our best-of-breed visitation management solution. Through managed hosting, you can dramatically reduce your up-front capital investment and in-house resource requirements.

Video Visitation Functional Overview

GTL's Video Visitation System, powered by Renovo, includes the **VisManager** visitation management scheduling software platform that provides correctional facilities the tools to manage and control all types of visits through a single web interface: contact, face-to-face, video, Internet (at-home) and professional. The software was first deployed in 2003 and has been expanding ever since. **VisManager** is the clear leader in the visitation management market. By incorporating customer feedback into development every year, the **VisManager** software continues to provide the most comprehensive and configurable visitation platform.

GTL recommends the Department source the very best in scheduling software when selecting their vendor. **VisManager** is an all-encompassing visitation management solution developed specifically for correctional facilities. The system's modular design allows facilities to install only the functionality that applies to their department and opt for a phased deployment. This unique approach allows facilities to add additional functionality as policies and other factors change over time.

Whether your solution includes on-premise video visits, internet video visits or simply scheduling and managing face-to-face visits, this modular-based platform will equip you with the tools to effectively manage your visitation environment. Our VVS Solution's flexible, scalable, easy-to-use interface allows you to deliver exceptional service to the community while cutting the chaos out of visitation.

Often times, facilities offer a combination of these types of visits based on the classification of inmates or the type of visit (public or professional). Based on the customer's needs, the platform can handle any combination of traditional contact or non-contact barrier type visits, video visits, remote (internet) video visits and professional visits.

VisManager is designed to allow each facility to configure the system with their own specific policies and procedures—without the need for custom development or other interventions on GTL's part. Policies can be set up globally or applied only to certain housing units (visitation quotas, restrictions, approved visitor lists, etc.).

This allows facilities to schedule, manage, and track all visits and visit history in one system. Utilizing **VisManager** results in tremendous labor savings and operational efficiencies for correctional institutions of all sizes.

Features of the VisManager Scheduling Software Solution

- ✓ Scheduling a visit
- ✓ Charging for visits
- ✓ Event and Conflict Checking
- ✓ Reports
- ✓ Warrant Checks
- ✓ Easy Visitor Check-Ins
- ✓ User Groups and Privileges

The modularity and hardware neutrality of this software helps protect investments and prevent technology obsolescence. This system will include all visiting stations, video monitors, web cams, handsets and codecs for both onsite and remote video visitation. Our flexible solution supports a variety of configurations:

- ✓ **On-Site Facility Visitation** – Inmate and visitor video visitation units are located within a facility; allowing visits at the facility without the need for additional security.
- ✓ **Multiple On-Site Facility Visitation** – Video visitation units are located at two or more facilities; allowing visitor at one facility to visit inmates at the two or more facilities.
- ✓ **External Visitation** – Video visitation units are located at a facility and at an approved remote location such as courthouse or visitation center to permit video visitation between these units.
- ✓ **Remote Visitation** – Video visitation units are installed at facilities, which allow visits with remote home computers.
- ✓ **In-Pod Video Visitation-** Video Visitation is also available on GTL's In-pod kiosk for use by inmates , if the county procures these services at a later date for inmate email, commissary ordering, media/education digital content distribution, or electronic inmate requests

Enclosure Features

- ✓ Off-the-shelf components
- ✓ High resolution cameras
- ✓ Corrections-grade handsets and lanyards
- ✓ standard monitors (minimum)
- ✓ Corrections-grade hardened steel
- ✓ Liquid and vandal resistant
- ✓ Optional features including: mobile enclosures, dual handsets, and hardened keyboards.

Internet Video Visitation

Reduce Costs… Reduce Crowds… Simplify visitation

Video chat is nothing new, but effectively managing the complexities of inmate visitations via the Internet requires an Internet visitation environment that accurately accommodates the increased need for security and tracking associated with inmate visitation. GTL's VVS Solution provides the restrictions, quotas, billing rules, warrant checks, and video check-in functionality that are specific to Internet video visits with incarcerated offenders.

With one simple, easy-to-use website, visitors can register, schedule, and complete visits from their PC, laptop or tablet PC (iPad and Android). Most importantly, when an Internet video visit is not an option for the visitor, your staff can use the system to schedule and manage both Internet and on-premise visits using the appropriate quotas, restrictions, schedules, monitoring, and recording rules.

- Free Calls: In 5, 10 and 15 minute increments. Calls will be authorized at the Department's discretion.

GTL Response GTL will provide free calls in 5, 10 and 15 minute increments. GTL understands free calls will be authorized at the Department's discretion.

- Cell phone detection: Minimum of 15 detection units (cellsense or equivalent).

GTL Response GTL is including a minimum of 15 Cell Sense units to be deployed at locations selected by the Department. In addition to the minimum of 15 units to be provided to the Department, GTL will also purchase units to be held at the Lake Butler office. These units could be used as real-time replacement 'spares' should one of the DOC units fail. In that instance, Lake Butler would deliver the spare unit and have the damaged unit replaced so that investigators lose no productivity in their investigations

Additionally, GTL offers the Department an annual technology grant, which could be used for additional Cell Sense units. The details of the annual technology grant are detailed in our response to Section C – Value Added Services.

- Interactive Voice Response (IVR) scheduling: appointments, grievances etc.

GTL Response GTL's offer includes both an 'internal' IVR for scheduling appointments, grievances, etc and an 'external' IVR for public information inquiries.

Internal IVR

GTL's 'internal' IVR provides inmate's with a speed dial option from the ITS to schedule appointments such as sick calls, more fully described below, lodge grievances and report troubles.

Sick Call Scheduling GTL has proactively contacted the state's selected inmate health care providers, Wexford and Corizon, for the purposes of defining the specifications for providing an automated, secure, and documented "sick' call IVR solution. Our Sick Call Scheduling solution will assist inmates in appointment scheduling thus decreasing staff time to managed paper and work flows. Our solution is PIN driven; an inmate would pick up the phone, dial his or her PIN, access the automated IVR, leave a message, which would then be sent to the appropriate staff to triage the severity of request. Our solution greatly simplifies appointment scheduling. This solution follows the current Department's sick call sheet DC4-698A Rule 33.402.101, F,A,C, or any other new form that may be revised during the course of the contract.

Grievances and Trouble Reporting GTL proposes to provide one-way IVR capability to the inmates for the purposes of reporting grievances or problems to minimize Department staff from handling calls or complaints that might otherwise demand facility staff attention:

- ✓ ***Inmate Complaint Line*** at which inmates may leave questions or messages about problems they encounter using the inmate telephone system.
- ✓ ***Called Party Help Line*** at which outside parties (families and friends) may leave questions or messages concerning inmate calls, for example: phones inoperable, blocked calls, et cetera.

The Inmate Complaint and Called Party Help Lines will be regularly checked by GTL Site Administrators, who will respond to each caller's question or complaint and take appropriate action to clear up any issues.

Hotline Signage

Easily readable signage, provided by GTL at locations approved by the Assistant Warden of Programs throughout and on the grounds of the institution, will inform inmates of the existence of the "hotlines"; explaining the purpose of each, and providing the toll-free number for each.

Each grievance or trouble report will be researched by GTL staff to determine if a valid condition exists. If a valid condition exists, GTL will provide Department staff with the appropriate information including the nature of the grievance or problem along with the inmate's name and our recommended course of action to remedy the grievance or problem.

External IVR - Automated Answers for Frequently Asked Questions

GTL's Facility Services Secretary (FSS) is an automated attendant system that allows families and friends of inmates to easily interact and access, through a single toll free number, facility information, inmate status and other available services such as court dates, release dates, facility address, etc. Department staff is no longer burdened with answering basic and repetitive questions and can redirect and focus on Department priorities such as managing inmates.

The FSS has the capability to provide answers to the following topics via a simple menu driven toll free IVR

- ✓ Court Dates
- ✓ Release Dates
- ✓ Facility Address and Directions
- ✓ Facility Rules and Policies
- ✓ Visitation Information and Hours of Visitation

Relocation Due to Hurricane?

We can automate answers to any topic the Department desires. For example, if the Department wanted to provide information about the relocation of inmates due to a pending hurricane, the FSS could be quickly programmed to provide this information for affected family members providing peace of mind about their loved one's whereabouts.

FSS Integration with OBIS

The power of FSS is greatly enhanced through the integration with the Department's OBIS system. Once the interface is established with OBIS, FSS automatically updates the answers to common questions based upon the automated updates from OBIS thus eliminating an additional step requiring human intervention.

GTL has extensive experience interfacing with Offender Management Systems nationwide. This is especially important to demonstrate we have the proven capabilities to interface with OBIS for the FSS. As evidenced below, we have interfaced with a variety of different technologies for 3rd party system interfaces including:

✓ XML	Web Services
✓ Direct Database Access	Shared File System
✓ FTP	Batch Export to File
✓ Watchdog Applications	Socket Communication
✓ Screen Scraping	Application Program Interfaces

Benefits to the Department

- ✓ Drastically reduces staff time answering frequently asked questions
- ✓ Reduces staff otherwise spent updating answers to frequently asked questions
- ✓ Re-purposes valuable staff time to Department Priorities
- ✓ No cost to the Department

Benefits to Friends and Family Members

- ✓ Toll Free Access to Important Information
- ✓ 7x24x365 Access to Important Information
- ✓ Instantaneous Access– no time on hold for Department staff

Benefits to the Inmates

- ✓ Personal information such as court dates or release dates available immediately to friends and family members
- ✓ Peace of mind during relocation due to a hurricane

- Continuous Voice Biometrics

GTL Response Utilizing the underlying technology for Apple's SIRI, GTL is able to provide the Department with our latest addition to the GTL Voice Biometric solution, which is a unique speaker verification system that enables verification and identification of an inmate in real time, using a simple spoken pass phrase. Totally language and accent independent, the GTL voice biometric feature provides a secure, efficient and extremely convenient method to verify an inmate's identity. Our voice biometric solution is fully integrated and is easy to deploy within Department facilities.

Designed exclusively to meet strict global security standards, GTL's voice biometric solution has successfully passed independent security audits. Our state-of-the-art voice biometric accuracy is used to secure access to remote services, telephony and Web applications, effectively combating identity fraud and enhancing the customer experience. GTL's voice biometric solution has been selected as the verification platform of choice by leading correction industry and security organizations.

Features

- ✓ Language and accent independent
- ✓ State-of-the-art accuracy
- ✓ Fully Integrated with ITS
- ✓ Straightforward deployment
- ✓ Integrated security
- ✓ Convenient and non-intrusive (no personal information required)
- ✓ Multi tenancy, scalability, and multi-site high availability
- ✓ Future proof affording the ability to expand capabilities
- ✓ Multi-engine architecture allowing further flexibility and interoperability

How It Works

GTL's voice biometric solution is an integrated component of GTL's ITS solution which provides secure access to initiate the verification process. The inmate's pass phrase is acquired by GTL's voice biometric solution in order to verify a claimed identity. A verification result is then returned to confirm the inmate's identity.

Enrollment

Enrollment in GTL's voice biometric solution is carried out by an inmate stating three consecutive renderings of the selected pass phrase, creating a unique voiceprint.

Verification

GTL's voice biometric solution verifies the inmate by comparing a single repetition of the enrolled pass phrase to the voiceprint stored in the system's voiceprint repository.

Continuous Voice Biometric:

Additionally, GTL will provide the Department the GTL Continuous Voice Biometric feature, which is a continuous scan for inmate, and called party phone swap control and prevention feature. The ITS continuous voice biometric solution is fully integrated with the ITS. GTL will deploy the continuous voice feature in conjunction with the initial voice verification biometric feature.

- ➢ Operates in Real-Time as opposed to other voice biometric products which are strictly post production.
- ➢ Resides as an integral component of the ITS and does not require 3rd party software to be opened outside of the ITS user interface.

- Also, as described below the technology is working throughout the call and will prevent fraudulent handover of the handset to a different inmate.

With our continuous voice search (Voice IQ) feature enabled, line-monitoring modules continuously tracks the inmates voice during the conversation; once system detects a 'Speaker Change' event, it triggers an event alert. The alert is capable of performing any combination of the following actions:

- ✓ Alert both parties that a "Speaker Change" event has occurred.
- ✓ Terminate the call.
- ✓ Store 'Speaker Change' event information in the ITS database.
- ✓ Alert designated Department personnel
- ✓ Mark recording for future search of speaker change events including location offset

Actions shown here are triggered in real time, which is a *GTL exclusive feature*. After call completion, the Speaker Change Events collect during the call are stored in the ITS database. All Speaker Change Events for all inmate calls at Department facilities are stored collectively in the ITS database for further search and retrieval.

Additional Features:

- ✓ Seamless Enrollment
- ✓ Feature can be enabled for inmate or called party audio
- ✓ Speaker Change Events are stored separately, not altering the original recording in any way.

Future Features on Product Roadmap

- ✓ Identify each speaker on the call
- ✓ Identification of former inmates on the called party side

Should the Department be interested in JLG's Investigator Pro with enhanced Continuous Voice Biometrics, we have included additional details in our Valued Added Services section.

- Inmate voice mail: Maximum of thirty (30) seconds for friends, family and staff

GTL Response GTL will include inmate voice mail for friends, family and staff with a maximum message duration of 30 seconds. Our inmate voice mail solution will be fully integrated within our ITS thus the Department retains security controls including monitoring and recording capabilities of inmate voice mails.

- Ability to search calls by keywords.

GTL Response

Nexidia™ Keyword Search

GTL has partnered with **Nexidia**™, a leader in voice and speech pattern recognition solutions, to provide word data-mining capabilities. The need to analyze data gathered from telephony audio sources, in multiple languages, is mission critical for corrections agencies and we are confident the Nexidia™ solution will exceed the Department's expectations in this area. Nexidia's Keyword search is far superior to in-house developed application using patented technology and support for more than 35 languages and dialects.

The Problem

A considerable amount of audio recorded is being analyzed using only metadata that is strictly a single dimension view into the contents of the overall audio, resulting in an unreliable and fragmented investigation. The sole use of metadata also leads to a very inefficient search process where significant time is spent listening to audio data that is not relevant to the focus of an investigation. Department staff responsible for identifying and assessing current and future threats understand that the information they uncover is time sensitive and loses its value if it takes too long to extract. Legacy audio search methods are not capable of operating at the same speeds and the indexing utilized by those methods results in call transcriptions being delayed and often skipped due to their inefficiencies. Nexidia provides the ability to stream, index and search spoken words in a matter of seconds after the call has been completed.

The Nexidia™ Solution

Nexidia™ will enable Department investigators to tap into the massive amounts of recorded audio communications at the fastest speeds, highest accuracy and with the most integrated deployment options. Department staff can now index large amounts of recorded audio from phone calls or computer voicemail making content instantly searchable directly from the same user interface where a call detail report is generated, further increasing the time saved. By eliminating the need to translate speech to text, and then mining that text, Nexidia™ provides indexing speeds never before imagined.

Nexidia™ can instantly search any spoken word, enabling the timely identification of relevant threats and trends, and empowering agencies to immediately respond with preventative, protective action. The patented phonetic search technology enables searches on proper names, inexact spellings, industry terms, jargons, slang and colloquialisms—all without extensive training, large dictionaries or vocabulary updates. Nexidia's extensive language capabilities leverage the linguist by delivering highly accurate results regardless of the speakers' gender, age, dialect, accent or speaking style.

Nexidia's Extensive Language Capabilities

Nexidia™ supports more than 35 languages and dialects. Language models are created with representative audio that provides a robust language recognition capability out of the box. Language support can also be further refined using Nexidia's extensible language tuning framework. Because the technology does not require a dictionary, new language capabilities can be developed relatively quickly.

How Nexidia™ Phonetic Search works

Nexidia™ technology is based on phonetics—the systematic study of the sounds of human speech. In all the languages of the world, there are about 400 distinct sounds (known as "phonemes") though most languages use only a fraction of that total. By using these tiny components of language, Nexidia is able to capture a true record of what is being said in an audio track, which can be searched more quickly, accurately and flexibly than with any other technology.

The process works in two phases. In the first phase, recorded audio is streamed into the system and a time-aligned phonetic index is created. Because phonemes are simply uttered sounds, the indexing is not affected by factors such as background noise, languages, dialects or speaking styles.

The second phase begins when a search is requested. Searches are performed directly on words or phrases, or using special operators such as Boolean strings or time-based proximity to other content. Nexidia's proprietary and highly efficient search engine identifies and matches the phonetic equivalent of the search string and returns relevancy-ranked results.

The result is a process that not only creates the truest representation of spoken audio, but also enables the fastest, most accurate access to the information contained within the audio files. Whether used to improve the tagging of audio for syndication, to perform ad hoc searching for audio discovery and evidence, or for analysis and reporting on large volumes of customer call data, Nexidia™ delivers advantages no other technology can match.

Key Benefits to the Department

Greater Speed: Phonemes are the tiniest building blocks of language. Using these small bits enables faster processing of audio and the ability to find words and phrases within context without requiring complex and difficult-to-maintain dictionaries.

Greater Accuracy: Today's languages are changing rapidly. New words, industry terms, blended words, proper names, slang, code words, brand names, and even the non-standard mixing of different languages are all easily processed with the phonetic approach.

Greater Flexibility: Because Nexidia technology is not dictionary-based, there is no need to train the system for dialects or accents. Additionally, Nexidia™ is unaffected by unique speaking styles, jargon and even audio quality that can impact the performance and accuracy of text-to-speech methodologies, so you get what you need faster and with less impact on your resources.

- Capability to capture inmate to inmate telephone communications

GTL Response As a member of the ICER consortium, GTL provides the Department the capability to capture inmate to inmate telephone communications. ICER (Inmate Communication Evaluation and Reporting) is an emerging technology offered by JLG Technologies, which attempts to detect inmate to inmate telephone calls. The ICER technology is a post call event analysis tool used to analyze call data to identify potential inmate to inmate telephone calls.

- Location based services of called cell phones.

GTL Response
Utilizing powerful and accurate GPS location based services, GTL Cell Point can access a consumer's cell phone location regardless of the network or device type. Using carrier network-based location and GPS, GTL Cell Point can help you locate cell phone users through pinpoint location, latitude/longitude coordinates or geo-fencing proximities. Investigators within our reporting application can select a 'Get Location' button, which will provide the user a map with the location of the cell phone user. Location based services are most effective with the major wireless carriers including ATT, Sprint and Verizon Wireless who provide a combined 83% of wireless service.

<u>Features of GTL Cell Point include:</u>

- GEO Fences
- Adjustable GEO Fences – User Defined
- Real time notifications
- Ad Hoc Queries
- Court order may be required for on-demand cell phone locations

What is Geo Fencing?

Geo Fencing is setting up a perimeter in an area of interest and determining if calls from a Department facility are going to said area of interest.

Example of Geo Fencing: Alerts if a cell phone was called by an inmate phone within a ½ mile of the facility and provides ability for administrator/investigator with proper rights to listen to that call LIVE. This is of interest to a facility where a suspect is about to bring in drugs at visitation, throwing any form of contraband over the wall or in the recreational area, etc.

Geo Fence can be established for an area around the facility, a known drug house, area of high gang activity, etc.

Ad Hoc/On Demand Search

Department staff enters a cell phone number and the system 'pings' the cell phone to determine its location. The degree of accuracy is dependent upon the number of towers near the cell phone – i.e. rural towers with fewer towers = lower accuracy while metropolitan areas with more towers = greater accuracy.

- ✓ Location information is derived from the longitude and latitude of the cell phone towers.
- ✓ GTL follows all applicable law enforcement guidelines for providing cell phone locations
- ✓ Location services provide a moment in time location snapshot
  - ➢ Historical locations and movements are available via a subpoena or court order.

In order to provide the best value to the state, the Department reserves the right to accept or reject any or all of the additional negotiated services.

GTL Response GTL understands the Department reserves the right to accept or reject any or all of the additional negotiated services.

C. VALUE-ADDED SERVICES

Value-added services include any services, including additional services that the Contractor offers to provide as part of the Contract resulting from the ITN that is either not required to be provided in the ITN or RBAFO or clearly exceeds the minimum requirements of required service. The Respondent shall provide a detailed description of each value-added service, system and/or equipment functionality, in narrative form. If included in the Contractor's BAFO and accepted by the Department, "Valued-Added Services" shall be provided as part of the contracted service at no additional cost to the Department and with minimal impact to family and friends.

GTL Response GTL is proposing a number of value added services beyond the minimum specifications of the ITN and Additional Negotiated Services, which further demonstrate the present and future value of our capabilities to the Department.

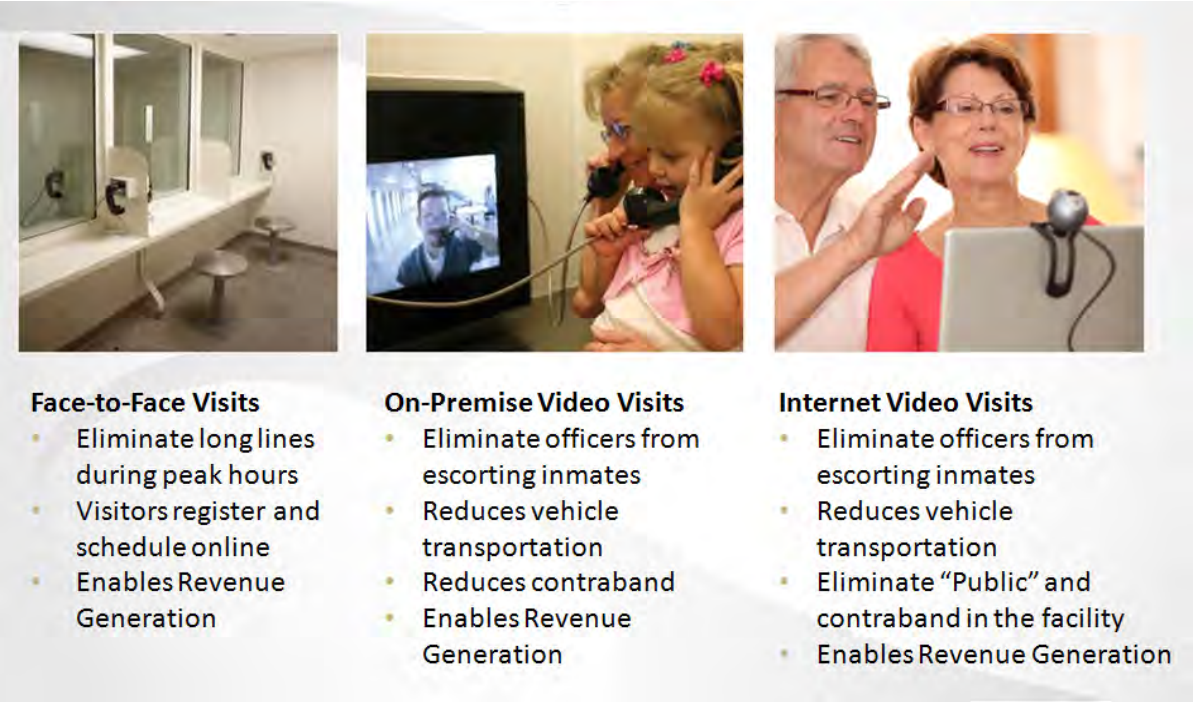
1. Visitation Scheduling
2. Pilot for Wireless Devices for Inmate Education, Re-entry Programs and Secure Communication
3. $100,000 Annual Technology Fund
4. Investigator Pro Technology with enhanced Continuous Voice Biometrics
5. Debit Calling Option
6. Call Track – Parolee Monitoring Services

Value Added Service #1 - Visitation Scheduling for All Department Visits

GTL's fully-integrated prison solution includes supplying the Florida Department of Corrections with the "best in class" **Visitation Scheduling Software powered by Renovo**. GTL's exclusive relationship with Renovo Software means that only GTL has the ability to provide the most powerful and comprehensive visitation management and scheduling software in the Country. This mature and fully proven solution will revolutionize how the Department manages visitation today. Friends and family will now schedule, track and receive notification of inmate visits without the hectic "first-come, first-serve" visitation policy. Visitations are scheduled online using a simple website that can be accessed at home or via Smartphone.

Visitation Scheduling & Automation

Inmate visitation management should not be one-size fits all – visitation management software must address your unique policies, challenges, and requirements. GTL's video visitation solution is designed to let you to create specific policies, quotas, and restrictions that allow for effective and accurate visitation scheduling – reducing costs, crowds, and conflicts.



GTL's Visitation Scheduling Software, is an all-encompassing visitation management system developed specifically for correctional facilities. The system's modular design allows facilities to use only the functionality that applies to them and opt for a phased deployment. This unique approach allows facilities to add additional functionality as budgets, policies, and other factors change over time. The software is designed to allow each facility to configure the system with their own specific policies and procedures—without the need for custom development or other interventions on GTL's part.

Policies can be set up globally or applied only to certain housing units (visitation quotas, restrictions, approved visitor lists, etc.). Often times, facilities offer a combination of these types of visits based on the classification of inmates or the type of visit (public or professional). Based on the customer's needs, our platform can handle any combination of traditional contact or non-

contact barrier type visits, video visits, remote (internet) video visits and professional visits. In addition, this software can be configured with rules and policies specific to each visit type. This allows facilities to schedule, manage, and track all visits and visit history in one system. The GTL Scheduling Software results in tremendous labor savings and operational efficiencies for the Department.

Benefits to the Department

- Friends and family can schedule visits on-line or on their Smartphone - reducing parking lot congestion, reducing public visitor conflicts, reducing staff stress and overall, automating all aspects of visitation scheduling and public communications.
- Components of the web-based and lobby scheduling software:
  - ✓ Multilingual web and kiosk interface
  - ✓ Professional web-based registration and scheduling allows the Department to set unique policies for professional visitors
  - ✓ The ability to provide visitor kiosk registration and scheduling via ID card reader
- Conflict checking to ensure inmate visitation availability, based on:
  - ✓ Inmate and station availability
  - ✓ Inmate and visitor quota verification
  - ✓ Inmate and visitor restrictions
  - ✓ Housing unit visitation schedules
  - ✓ Visitation center hours
  - ✓ Schedule events as exceptions to regular visitation schedule (holidays, lock-downs, maintenance, etc.)
  - ✓ Number of visitors allowed per visit
- Ability to automatically match visitors to wheelchair-accessible stations.
- Friends and family receive automatic confirmation of visits. When an inmate's housing unit or status changes, our solution will automatically reschedule affected visits. If visits cannot be rescheduled, they are cancelled and visitors are notified via email and automated phone messages.
- Automated inmate updates and cancellation notices
- Fully configurable policies and quotas that can be set:
  - ✓ For both inmates and visitors
  - ✓ By day or by week
  - ✓ Ability to set different quotas for different housing units
  - ✓ Custom visitation schedules for different housing units and visitation centers
  - ✓ Assign staff users to user groups with specific privileges
  - ✓ Inmate & visitor restrictions
  - ✓ Reconfigure policies at any time without redeployments or further development
- When the facility cancels a visit, friends and family are automatically notified via a pre-recorded telephone message (in English or Spanish) and email. This eliminates the need for staff to manually notify visitors.
- Seamless interface of the scheduling software into the Department's current Offender Based Information System (OBIS). Inmate bookings, movements, and releases are immediately propagated throughout the system, providing up-to-date visitation schedules, with visibility across the facility.
- Mass email of notifications to all active visitation scheduling users in the public visiting system.

- Revenue generation opportunities for how visitation is conducted today:
  - ✓ Charge for visits in excess of inmates' "free visit" quotas
  - ✓ Charge during specific days or times of the day
  - ✓ Charge for specific locations
  - ✓ Set up unique fee structures
  - ✓ Create override and refund polices
  - ✓ Generate billing reports
- Extensive reporting capability and intelligence tools for GTL's Data IQ product and for investigators across the Department.
- Ability to conduct pre-visit warrant checks, to support security and public safety.
- ID card readers for visitor registration, scheduling, and check-in.

The Department will be assigned a team of experts to install, configure, and train the Department and every facility on how to use the scheduling software. This solution empowers the Department to streamline visitation processes through increased efficiency. **GTL offers the Renovo Visitation Scheduling Software at no cost to the Department.**

Value Added Service #2 - Pilot for Wireless Devices for Inmate Education, Re-entry Programs and Secure Communications

Imagine a Department facility where inmates have a correction's grade tablet capable of offering Department approved curriculum toward completion of a GED or educational content aimed to improve the recidivism rate for inmates, all from their housing units.

Sound farfetched? In reality, these capabilities exist today. GTL has corrections grade wireless tablets and telephones ready to pilot with the Department. While a quality corrections grade device is important, it is only half the story. Through our relationship with Smart Horizons and Sandy Osteen of Critical Connections, we will have curriculum designed for inmate education and re-entry ready to deploy.

In addition to benefits of education, these wireless devices could also be used for telephone calls and video visitation sessions. If interested, GTL would work with the Department to safeguard these features and ensure only Department authorized communication takes place from these devices preventing inmates from impermissible internet access and unauthorized communication.

GTL is willing to jointly pilot with the Department wireless devices for use by inmates for inmate education, re-entry programs and future communication options such as video visitation and telephone calls. **GTL offers this pilot at no cost to the Department.**

Value Added Service #3 - $100,000 Annual Technology Fund

Each year, our customers are faced with tighter budgets and difficult choices in how to manage to these budgets. Beyond commissions, our $100,000 annual technology fund provides the Department with the flexibility to fund additional technology such as Cellebrite or Cellsense units, implement a cell phone interdiction program or any other technology deemed a priority by the Department. **This annual technology fund is offered at no cost to the Department.**

As an additional option to the Department, the amount of the yearly technology fund may be increased with minimal impact to family and friends.

Value Added Service #4 - Investigator Pro Technology with Enhanced Continuous Voice Biometrics

As an alternative option for the Department's need for inmate calling verification of identity, GTL is able to provide the JLG continuous voice biometric inmate identification system.

The Investigator Pro™ system is a powerful suite of investigative analysis tools that identifies inmates over telephone calls and exposes those who try to hide their identities to engage in criminal activity.

It automatically flags criminal calling patterns and other case sensitive issues, and alerts investigators to suspicious calls so they can quickly prioritize investigations. The system's dashboard automatically collects and analyzes a vast amount of information that would otherwise be labor intensive to gather and interpret.

The Investigator Pro system biometrically analyzes the entire phone call. The system then detects suspicious patterns across the entire call database, and automatically presents its findings. As a result, investigators no longer have to drill down through mountains of information to make the connections.

Investigator Pro Feature Highlights

High Interest Call Feature: *Automatically identifies and alerts investigators to high interest calls so they can spend less time monitoring and more time investigating.*

3-Way Call Detection: *Exposes inmates' attempts to disguise their identities and leave no trail behind.*

Intelligence Analysis: Proactively analyzes criminal calling patterns to intercept illicit activities.

Administrative Reports: Optimizes information so you can better manage your priorities.

Case Evidence Management Tools: Collects and organizes your evidence all in one place with state-of-the-art tools.

Interagency Intelligence Sharing: Gathers more credible intelligence information for you to share with other public safety agencies.

If the Department desires to implement the JLG continuous voice biometric solution, this technology is available with minimal impact to family and friends.

Value Added Service #5 - Debit Calling Option

Debit calling is a proven call option, which benefits the Department in the following ways

1. Increased contact between inmates and their friends and family members
2. Increase in annual commissions
3. The same security features as Collect and PrePaid Collect calling
4. Offered at no cost to the Department

For example, a large DOC with nearly 50,000 inmates experienced a doubling of call volumes since the implementation of an integrated debit calling option, which generated additional commissionable revenue while providing inmates another option for communication at affordable rates.

GTL's ITS provides traditional collect calling as well as prepaid call options to ensure that inmates have every possible opportunity to connect with their friends and loved ones. Roughly half of all telephone numbers in the United States, including almost all cell phone numbers, are restricted from receiving traditional collect calls. Prepaid calling options including debit calling overcome this limitation; enabling the completion of many more, otherwise approved, inmate calls. Debit calls are subject to the same ITS call restrictions and security functions as collect calls.

Debit calling allows inmates to pay for calls directly from their existing commissary/trust accounts, eliminating the need for calling cards that can be lost or stolen. This is accomplished via an interface between the ITS and the facility's Offender Management System or the Commissary Banking system.

Inmate Debit Calling

- Inmate debit can fund both **domestic** and **international** calling.
- Inmate debit allows access to many more phone numbers because so many numbers are blocked from traditional collect calling.
- Inmate debit provides international calling without the security and financial risks associated with international collect.
- Inmate debit calls are more likely to be accepted since the answering party does not have to pay for the call.

Fully Integrated Debit – This innovative approach allows inmates to make calls using money that exists in their commissary/trust accounts. Cardless (Seamless) Debit calling is offered at no cost to the Department. Inmates can easily fund debit calls through the inmate telephone system at a moment's notice and complete calls to any facility-approved telephone number he or she chooses. Family and friends may contribute to an inmate's debit calling ability by depositing money directly into the inmate's commissary or trust account.

Inmates use their confidential Personal Identification Numbers (PINs) to place debit calls. The advantage to Carless (Seamless) Debit calling is that it has proven superior to the selling of commissary time or calling cards and best of all **no** human intervention is required.

The advantages of **fully integrated debit** include:

- ✓ When GTL implements fully integrated debit the result is usually a substantial increase in call volumes and commission revenues for the facility.
- ✓ Less busywork for staff with greater system accuracy and fewer data entry errors.
- ✓ No calling cards to sell, monitor, or worry that they are being used for gambling.
- ✓ Inmates have access to their existing funds in real-time through the ITS to pay for debit calls.
- ✓ Quicker, easier debit calling through the OMS/accounting module.
- ✓ Automatic deactivation of an inmate's debit account upon the inmate's release from incarceration.

Value Added Service #6 - Call Track – Parolee Monitoring

Call-Track is a phone and web-based service used to track low-risk offenders while freeing up case managers to focus on higher-risk offenders and other tasks.

How it Works

The **Call-Track** program is a fully-integrated module within the GTL Case Management System (CMS), but can also operate as a stand-alone system for monitoring low-risk offenders via phone and web-based reporting services. The Call-Track service is no cost to the Department with low fees incurred by the offenders being monitored. Payments may be accepted via an IVR or directly through the web-reporting site itself.

Offenders are assigned to various reporting schedules, ranging from weekly to bi-weekly to monthly. Offenders may be assigned to phone and/or web reporting services. Each reporting method may have multiple services associated with it, each with its own set of custom-defined questions. A history of all recorded responses, both audio and web-based, is maintained for offenders enlisted in the Call-Track service.

Call-Track Alerts are generated when an offender responds to a question that triggers a change in data, such as a change in address, employment, recent arrest or admittance to violating their terms of probation. When an alert is triggered, case managers receive updated information in the CMS and can also choose to have notifications sent via email, phone, text message, etc.

Case managers supervise their Call-Track caseloads through the **Call-Track Management** module. This module utilizes a Dashboard utility to present users with information in an easy-to-analyze format. Color-coded notifications identify upcoming or past due calls, missed payments or offender reports that generate Alerts. In addition to reviewing reporting information, case managers can send mass voice and/or electronic communications to individuals or groups of offenders. Offenders may also receive additional reminders for things like upcoming reports, office visits, court dates, etc.

D. EVALUATION PROCESS INFORMATION

Phase 8 - Best and Final Offers

Respondents will be asked to submit to the Department their Best and Final Offer in accordance with revised specifications, if applicable, as set forth in the Department's Request for Best and Final Offers. The vendors' Best and Final Offers shall contain the best pricing option the vendor is prepared to offer as specified in Section A, Pricing, however, after submission of Best and Final Offers, the Department reserves the right to clarify any element of required service or further negotiate pricing with a single or all qualified respondents prior to final award. After receipt of BAFO's, the Negotiation Team will prepare a summary report of negotiations and enter a recommendation as to which respondent provides the best value to the state. Award will be made in compliance with Section 287.057 (3) (b), Florida Statutes.

GTL Response GTL has submitted its Best and Final Offer in accordance with the revised specifications and instructions.

E. BEST AND FINAL OFFER RESPONSE INSTRUCTIONS

Responses to this Request for Best and Final Offer shall be received no later than close of business (5:00 p.m. ET), Tuesday, June 18, 2013. Responses may be emailed (preferred), faxed or sent hard copy sent via mail. If submitting via email, please submit to hussey.julyn@mail.dc.state.fl.us with a cc to wright.kelly@mail.dc.state.fl.us. Faxed responses may be sent to 850-488-7189

F. SIGNED STATEMENT OF ACCEPTANCE OF MINIMUM SPECIFICATIONS, TERMS AND CONDITIONS AND FINAL CONTRACT

The Respondent shall include a signed statement acknowledging acceptance of the minimum specifications and their intent to comply with all terms and conditions indicated in the ITN, Respondent's Initial Response, the Request for Best and Final Offer and Respondent's Best and Final Offer.

When a contract is established between the Department and the successful Respondent, the ITN, the Initial Response to the ITN, the Request for Best and Final Offer and the Respondent's BAFO shall be incorporated into and thereby become a part of that contract. If there is a conflict in language, the Department's contract will govern.

GTL Response Please see the attached cover letter preceding our Best and Final response, which includes a statement that GTL, is acknowledging minimum specifications and our intent to comply with all terms and conditions indicated in the ITN, GTL's Initial Response, the Request for Best and Final Offer and GTL's Best and Final Offer.

ATTACHMENT 1

Additional Negotiated Services Cost Proposal					
				VIDEO VISITATION ONLY	
Additional Negotiated Services Requested	Additional Charge Per Minute to Blended Telephone Rate Proposed * (i.e. $.01 increase)	"To Connect" Surcharge** (i.e. $.25 per call)	Percentage Change to Department Commission Rate Proposed*** (i.e. 2% reduction)	Blended Video Visitation Per Minute Rate Proposed (inclusive of surcharges)	Department Commission % Rate Proposed
1.) Video Visitation (5 pilot sites)				$0.60	25%
2.) Free Calls	NC	NC	NC		
3.) Forensic Extraction Options	NC	NC	NC		
4.) Investigative Function	NC	NC	3.0% reduction		
5.) Cell Phone Detection	NC	NC	NC		
6.) IVR Scheduling	NC	NC	NC		
7.) Continuous Voice Biometrics	NC	NC	1.5% reduction		
8.) Inmate Voice Mail	NC	NC	NC		
9.) Ability to search calls by Keywords	NC	NC	1.5% reduction		
10.) Capability to capture inmate to inmate telephone communications	NC	NC	NC		
11.) Location Based Services (cell phones called)	NC	NC	4% reduction		

*If no additional charge per minute is being proposed respondent must indicate NC (no charge)

**If no surcharge is being proposed respondent must indicate NC (no charge)

***If no change to initial department commission rate is being proposed respondent must indicate NC (no change)

Attachments

cc: Kalpak Gude (via email)
Randolph Clarke (via email)
David Zesiger (via email)
Lane Johnson (via email)
Anjali Vohra (via email)
Melissa Kirkel (via email)
Diane Griffin Holland (via email)
Richard Mallen (via email)
Marcus Maher (via email)
Rebekah Goodheart (via email)

CERTIFICATE OF SERVICE

I hereby certify that, on November 6, 2013, the forgoing Opposition was served via electronic mail on the following persons:

Marlene H. Dortch, Secretary
Federal Communications Commission
Marlene.Dortch@fcc.gov

Chairman Tom Wheeler
Federal Communications Commission
Tom.Wheeler@fcc.gov

Commissioner Mignon Clyburn
Federal Communications Commission
Mignon.Clyburn@fcc.gov

Commissioner Jessica Rosenworcel
Federal Communications Commission
Jessica.Rosenworcel@fcc.gov

Commissioner Ajit Pai
Federal Communications Commission
Ajit.Pai@fcc.gov

Sean Lev
General Counsel
Federal Communications Commission
Sean.Lev@fcc.gov

Julie Veach, Chief
Wireline Competition Bureau
Federal Communications Commission
Julie.Veach@fcc.gov

Michael K. Kellogg
Kellogg, Huber, Hansen, Todd,
Evans & Figel, PLLC
1615 M Street, N.W., Suite 400
Washington, D.C. 20036
mkellogg@mhhte@com

By: /s/Deborah M. Golden
Deborah M. Golden, Esquire