

December 17, 2013

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Subject: ATN, Inc. / AmTel Comments on Changes to Rules for Inmate Calling Services Docket #: 12-375

To Whom It May Concern:

ATN, Inc. is a supporter of the recommended changes and believes that the benefits will positively impact the government municipalities; inmates; called parties; and inmate telephone companies. We are working with each State's Public Service Commissions. We believe that the only way the change to the flat rates will work is the change be applied across the board for all call types at the Hard Rate Cap recommendation.

Listed below is information that pertains to both AmTel (Inmate Telephones), as well as Customer Service of America, "CSA" (Call Center). Both companies are subsidiaries of ATN, Inc. and we respectfully agree with all but two of the FCC recommended changes to rules for Inmate Calling Services. ATN, Inc. has been keeping abreast of the Wright Petition and our companies have already been preparing for the anticipated regulatory changes. AmTel has been providing information to correctional facilities and procurement offices for several years attempting to point out hidden fees that are being charged by some of the inmate telephone companies.

ATN, Inc. is a privately held corporation that employs nearly 100 people. The corporate office is located in St. Marys, GA. CSA in the final stages of development with regards to new Call Center software and all agents will be converting to the new system before the end of the year. The project has cost CSA more than \$500k to complete and will provide multiple options for lower priced inmate telephone calling alternatives.

- Both AmTel and CSA are two separate companies with two separate tax filings. AmTel does not receive any portion of the fees generated through Call Center payments.
- AmTel DOES NOT charge called parties or inmates, any taxes or fees on any calls. The existing price of the inmate telephone calls are based solely on AT&T telecom rates, and AmTel absorbs the taxes and fees for the customers. AmTel is in the process of revising all of the tariffs before February 11<sup>th</sup>, 2014 that will include several cost saving options.
- AmTel, in accordance with USAC, has recently changed in status to a Non-Interconnected VOIP.
- AmTel does not offer Text-to-Collect, Pay Now, or any other service similar to these.
- AmTel provides (1) free three-minute telephone call to all non-collect numbers and free five-minute calls in booking, as well as free inmate calls to the Consulates, PREA, State and Federal Public Defenders, and also free five-minute local calls in the facility lobbies.



- AmTel is in agreement with a flat rate of \$0.25 per talked minute for each call type (Collect, PrePaid, and Debit) for local, intra-LATA, and interstate calls. AmTel would like to begin making rate changes as soon as approval is officially granted from the FCC.
- AmTel is in agreement with a flat rate of \$0.50 per talked/video minute for each VVS session and will respectfully ask the Commission for permission to be granted additional VVS authority under our existing CPCN authority.
- AmTel 's intentions are to charge international rates at \$0.50 per minute.
- CSA respectfully disagrees with \$5.95 for Live Agent Phone Payment via credit or debit card. This is because CSA is the ONLY Inmate Telephone Call Center in the industry that provides LIVE, bi-lingual, (24x7x365), customer service to inmates, called parties, and facility personnel. The majority of other Inmate Telephone Call Centers will only allow their live representatives to take payments. CSA does much more than just take payments and the representatives spend more time on the phone providing customer support on non-revenue generating calls than they do taking payments. CSA provides the no-pay option of sending in money orders, but CSA believes that called parties should have the option of speaking with live representatives for reasons other than payments. However, CSA will only be able to continue providing the below free services if allowed to charge \$10.00 per live credit or debit card payment. This fee is what subsidizes the below free services and allows CSA to maintain personnel to accommodate a less than three-minute weekly average hold time. CSA does not believe in forcing customers to automated systems and/or voice mail. The main difference between CSA and the other Inmate Telephone Call Centers is our old-school customer service approach.

CSA Non-Revenue generating calls for 2013 include the following:

- a) *Inmate Hotline In-Touch* – CSA representatives pro-actively assist Inmates by contacting their loved ones and family members. Outbound calls are placed at CSA's expense in an attempt to contact the inmate's family members or loved ones and provide them with details for receiving future calls. At no time is the Inmate added on the line with a called party. ATN, Inc. understands the rule of not allowing any Live Operator assisted calls, and we do not.
- b) *Live Information Service Calls* – CSA has taken more than 10,000 free calls from the public answering routine questions about their loved ones that are incarcerated; (some ITS companies have Interactive Voice Response Systems and they in-turn charge the correctional facilities up to \$5.95 per call, per inmate, per month)
- c) *Spanish to English Translations* – At the company's expense, CSA representatives often act as a translator to the family members of Spanish Inmates and sometimes between a Spanish Inmate and a Correctional Officer.
- d) CSA, at the company's expense, handles thousands of Inmate Grievances and Sick Call reports for facilities annually.

Service brochures are attached for your review and all of the above is handled by CSA representatives at no cost to the municipality, inmate, or called party. All of these non-revenue generating calls are essentially funded by the \$10.00 payment processing charge.



A reduction to \$5.95 in the Live Agent Call Center approved fee will result in a substantial loss to CSA and could cause CSA to downsize some of its employees and would have a negative effect on the economy. CSA believes the Live Agent Call Center fees to be in line or lower than fees charged by Airlines, Utility Companies, Banks, Tax Offices, Mortgage Companies, Government Municipalities, etc. CSA respectfully requests that the FCC take the non-revenue generated service calls into consideration. These free calls help to save Sheriff Offices, Jails, and Detention Centers numerous man hours in answering mundane questions from the public.

- CSA is in agreement with a \$3.00 Kiosk payment via cash, credit, or debit card. CSA plans to offer Lobby Kiosk by 1<sup>st</sup> quarter 2014.
- CSA will be dropping the on-line web payment option from \$5.95 to \$3.00 before February 11, 2014.
- CSA respectfully does not agree with a prohibition of the Call Center receiving a portion of a payment from Western Union and CSA does not accept payments from MoneyGram. CSA representatives frequently have to make refunds for Western Union Quick Collect payments and this portion of a processing fee helps to recover the associated refund expense. Other companies require refund requests to be mailed, emailed, or any other number of 'rules' to the extent that customers would rather let the companies keep the refund than to go through all of the mandated red tape. CSA is pro-active with non-active accounts and attempts up to three (3) times to reach the account depositor. The Western Union Quick Collect Payment is presently at \$10.00 per transaction. In order to comply with new regulatory mandates, CSA will stop receiving Quick Collect payments from Western Union.
- AmTel does allow Collect Calls and does not charge any bill processing fees; AmTel absorbs the fees from the RBOCs for the customers.
- AmTel does not charge any additional fees for Debit, PrePaid, or Direct Billed Calls. Presently, AmTel provides a 10% across the board discount from collect calls for PrePaid and Debit calls.
- AmTel does not charge a fee for transferring trust/canteen accounts.
- AmTel does not charge a Paper Bill Fee.
- CSA does charge \$30.00 for returned checks.
- CSA does not charge for account set up or refunds.
- AmTel agrees that Provider or facility-assessed penalties for violation of confinement facility policies should be prohibited. Praeses, a middle management consultant company often used by some correctional facilities, imposes several fees to Inmate Telephone Companies and it is a requirement of their bids.
- CSA does not charge any Cost Recovery Fees.
- CSA and AmTel are in agreement to provide all items listed under the Website Information.
- AmTel is in agreement with all items under the Record Retention section.
- AmTel is in agreement with providing revised tariffs and welcomes a recommended format. All company tariffs will be revised before February 11, 2014.
- AmTel is in the process of setting up a Calling Plan system where customers can purchase a plan for a certain amount of calls per month. This will allow families to have a calling plan with no risk of unexpected expenses.





In closing, AmTel and CSA are definitely in agreement with the proposed inmate telephone rate reductions. Our Board of Directors does feel that the rate changes can be easily accomplished by companies that haven't predicated their business models and overhead/expenses on inflated non-commissionable fees. However, we do feel that correctional facilities should receive a modest commission because all of the money is re-used to help the inmates via the Inmate Welfare Trust Fund Accounts. As citizens, and taxpayers, we further believe that the recommended rates and fees are justified, in order to provide the security features and investigative tools that are necessary to keeping the society safe. We believe that AmTel and CSA business models can be a win-win for all involved parties.

Please feel free to contact me at (866) 882-2722 should you require clarification, or need additional information.

Respectfully,

/S/Karen Doss-Harbison  
President  
ATN, Inc.

