December 20, 2013

Marlene H. Dortch, Commission Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-B204
Washington, DC 20554

Re:  In the Matter of Rates for Interstate Inmate Calling Services, WC Docket No. 12-375,
Further Notice of Proposed Rulemaking, “Inmate Calling Services for the Deaf and Hard of Hearing”

Dear Commissioners:

Helping Educate to Advance the Rights of the Deaf (“HEARD”)1 hereby submits this comment responding to the Federal Communication Commission’s (“Commission”) Further Notice of Proposed Rulemaking related to Inmate Calling Services (“ICS”) for deaf and hard of hearing prisoners.

Specifically, HEARD submits this comment on behalf of the nearly five hundred men and women in our Deaf & Deaf-Blind Prisoner Database, their family members, and countless deaf prisoners that we have yet to find in United States prisons and jails.4

HEARD unequivocally supports the establishment of “reasonable, just and fair” ICS rates for intrastate as well as interstate calls.5 However, we write today to note that even if the

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1 HEARD is an all-volunteer nonprofit organization that advocates on behalf of deaf and deaf-blind prisoners across the nation. HEARD created and maintains the only national database of deaf and deaf-blind prisoners.
2 Historically, “Deaf” has been used to refer to the Culture and Community of Deaf people collectively; while “deaf and hard of hearing” has been used to refer to the level of audiological function and hearing ability by any one individual. However, for the sake of this comment, “deaf” means: individuals with hearing levels that require auxiliary aids or accommodations.
3 This number includes four (4) prisoners who are hearing, but only communicate with their family through sign language. See HEARD’s Map of Deaf & Deaf Blind Prisoners here: http://bit.ly/RLySCJ.
4 It bears noting that the Commission, in its Further Notice of Proposed Rulemaking, incorrectly referenced HEARD’s database as a comprehensive database of deaf and hard of hearing prisoners across the nation. Ironically, the failure of prisons, jails and ICS providers to provide adequate access to telecommunication and other language access services for deaf prisoners means that most deaf prisoners have no way of contacting HEARD or anyone else outside the prison walls. To be sure, there are tens of thousands of deaf prisoners across the nation. For example, last year, Louisiana announced that it houses “at least 2,000 hard of hearing prisoners and three dozen deaf prisoners.” HEARD, however, only has two Louisiana prisoners in our Deaf & Deaf-Blind Prisoner Database.
5 The Commission has authority to regulate intrastate rates pursuant 47 U.S.C. §§ 201(b) and 276(b)
Commission decided to impose $.01 rate cap on all inmate calls, tens of thousands of deaf prisoners still would not benefit from the Commission’s decision. While we applaud the Commission’s decision to ensure that rates are just and reasonable, we remind the Commission that there is no fairness without equality.

For deaf prisoners and deaf family members of hearing prisoners, equality means affordable and accessible telecommunication devices—telephones, videophones, captioned telephones, TTYs and other auxiliary aids.

**IMPORTANCE OF ACCESSIBLE & AFFORDABLE INMATE CALLING SERVICES**

Al Jazeera America just aired a powerful three-part series, “Deaf in Prison.” In addition to exposing systemic abuse of deaf prisoners that necessitates contact with advocates and attorneys, the series revealed the glaring inequity that persists in access to prison telephone services for deaf prisoners. In one New York prison, staff admitted that hearing prisoners are granted a minimum of ten minutes per day on the telephone while deaf prisoners have to schedule an appointment with the city social worker to get the TTY when they want to use the telephone.

One mother recounted receiving the horrifying call from an Ohio jail that her son—who had requested interpreters and a TTY, but received neither for six days—had hung himself. He survived, she said, but upon his transfer to prison, he was denied access to a telephone for forty-two days at a facility where hearing prisoners can make calls anytime. The mother said that all she wanted was for her son to be treated as hearing prisoners are treated.

The journalists concluded—after an extensive three-year investigation—that as a result of prison and ICS failure to provide telecommunication access and interpreters, deaf prisoners “are left in their own silent prison behind bars.”

Studies demonstrate that incarcerated individuals who maintain contact with family members and the community have fewer infractions in prison (thus improving staff safety), and that they have more success when they return to the community. The recidivism rate for deaf prisoners far exceeds that of hearing prisoners in large part because deaf prisoners can rarely fully benefit from the inaccessible programs and services in prisons and on the road to reentry.

One social worker in the Al Jazeera America documentary emphasized that inaccessible telecommunication increases the likelihood of recidivism because it weakens deaf prisoners’ ties with the community and makes them feel as though family no longer loves or supports them. The current systems places deaf prisoners at more risk of abuse because staff and prisoners know that deaf prisoners have little recourse with respect to filing written grievances and obtaining outside support and advocacy via telecommunication. Deaf prisoners must have access to effective and affordable telecommunications so they can communicate with advocates.

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6 See HEARD Public Comment in FCC WC Docket No. 12-375, March 25, 2013. Hearing prisoner Larry T. Hill, on behalf of deaf prisoner Eddie Henry states that staff at the facilities cannot communicate with deaf prisoners, that the TTY is never in working order, and asks the FCC not to charge deaf prisoners to use the TTY and to consider replacing the TTY with videophones so deaf prisoners can have accessible communication with their families.
and attorneys. Deaf prisoners are often punished for their failure to obey oral commands, for using sign language to communicate, for failure to follow rules and procedures that were never communicated to them, for missing counts that they were unaware of, and for filing grievances about these persistent inequities. Advocates and attorneys need to be able to communicate in sign language with most of these individuals to assist them with the grievance processes and to provide meaningful support.

Accessible telecommunication also increases the likelihood of prisoners receiving needed access to rehabilitative services through video remote interpreting service that is accessed through videophone service hardware or software.

AUTHORITY TO REGULATE RATES & TECHNOLOGY

The Commission requests comments on whether section 276(b)(1)(A), which exempts “telecommunications relay service calls for hearing disabled individuals” from the Commission-established “per call compensation plan,” and section 225(d)(1), which requires the Commission to prescribe regulations that “require that users of telecommunications relay services pay rates no greater than the rates paid for functionally equivalent voice communication services,” provide sufficient authority to adopt a discounted rate for TTY calls.

Read individually or together, these statutes provide sufficient authority to the Commission to regulate rates charged to (and rates not charged to) prisoners for use of telecommunications relay services.

(1) Rates for TTY Calls

The Commission proposed a discounted rate of twenty-five percent less the safe harbor rate and expressed reservation that this rate may not allow for “ICS providers to recover the full cost of TTY calls.” Notably, numerous prisons and some ICS providers do not charge deaf prisoners or their families to use telecommunications relay services—each noting that 47 USC § 276(A) which exempts telecommunications relay service calls from compensation and the unreliable and tremendously time-consuming nature of these kinds of calls.

However, in September 2013, one HEARD advocate paid $63.49 for a thirty-three minute TTY-to-voice phone call. This is a clear violation of section 225(d)(1)(D) as this $2.00 per minute rate is the same rate that a hearing prisoner would pay for a voice-to-voice phone call. These unjust charges are the standard across the nation, not the exception. By statute, the Commission must act to remedy the disproportionate impact of these charges for individuals who use telecommunication relay services and those who accept calls from telecommunication relay services.

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7 Deaf prisoners are often punished for their failure to obey oral commands, for using sign language to communicate, for failure to follow rules and procedures that were never communicated to them, for missing counts that they were unaware of, and for filing grievances about these persistent inequities. Advocates and attorneys need to be able to communicate in sign language with most of these individuals to assist them with the grievance processes and to provide meaningful support.

8 See attached Purple Communications, Inc., White Paper on Video and Text Relay Services for Deaf Inmates in Prisons and Jails (stating that one set of equipment within the Virginia Department of Corrections allows for videophone and “emergency interpretation calls”).

9 Further Notice of Proposed Rulemaking, at 146.

10 Pay-Tel Communications, Inc., and numerous jails and prisons housing prisoners in HEARD’s Deaf & Deaf-Blind Database do not charge prisoners for TTY telephone relay calls.


12 47 USC § 225(d)(1)(D) require that “users of telecommunications relay services pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from point of origination to point of termination.”
In any case, the Commission’s proposed discounted rate does not take into account a number of factors mentioned by many commenters related to the time required to connect to the relay operator.13 These times can vary from two minutes to eight minutes. As such, there would necessarily need to be a greater discount on these calls depending on the facility, the condition of the TTY and telephone, background noise that causes feedback that results in garbled messages, etc.

Relatedly, deaf prisoners’ language access needs vary widely. The Commission’s proposed rate does not account for varying literacy rates of deaf prisoners—many of whom use sign language as their primary or only method of communication. Deaf prisoners will often require additional time, especially when they are attempting to communicate about complex issues. As stated in HEARD’s initial comment, prison TTY telephone calls are typically at least six to eight times longer than a hearing phone call.

As such, the Commission’s proposed rate does not sufficiently take into account factors that would lead to longer periods of time required for use of the TTY as compared to communication via traditional telephones.

(2) Technology Improvements

47 USC § 225 states that the Commission “shall ensure that regulations prescribed to implement this section encourage, consistent with . . . [47 USC § 157(a)], the use of existing technology and do not discourage or impair the development of improved technology.” Section 157 states, in pertinent part:

(a) It shall be the policy . . . to encourage the provision of new technologies and services to the public. Any person or party (other than the Commission) who opposes a new technology or service proposed to be permitted under this Act shall have the burden to demonstrate that such proposal is inconsistent with the public interest.
(b) The Commission shall determine whether any new technology or service proposed in a petition or application is in the public interest within one year after such petition or application is filed. If the Commission initiates its own proceeding for a new technology or service, such proceeding shall be completed within 12 months after it is initiated.14

The Commission’s Further Notice of Proposed Rulemaking states that the record indicates that despite the fact that using TTY equipment is not the preferred form of TRS for many deaf and hard of hearing individuals, the equipment is still in widespread use in correctional facilities. That ICS providers and prisons have resisted installing modern technology should not justify the continued exclusive use of obsolete technology that does not connect to the vast majority of the Deaf Community and that does not allow for equal communication access between deaf prisoners and hearing individuals outside of the prison walls.

13 See original comments of the American Civil Liberties Union, HEARD and the National Disability Rights Network (discussing the time required for connecting to relay operator).
The 2010 ADA standards specifically include videophones and captioned telephones within the definition of auxiliary aids and services, and the Commission’s own TTY Transition Subgroup of the Emergency Access Advisory Committee indicates that TTY usage is decreasing by about 10% per year, having cut in half over the past seven years. The same report indicates that TTY relay calls are only 12% of the total relay volume, and that 75% of all accessible calls made in the U.S. are made via videophone. Additionally, state departments of corrections from Vermont to Oregon have successfully installed videophones, demonstrating that there are no genuine barriers to installation. Prisons—largely due to lack of awareness and oversight—have resisted providing these necessary technologies.

Deaf people must have access that is equal to the service others enjoy and that is as effective as that provided to others. Improving rates for TTY use is an important step but it does not go far enough. Other communication methods are necessary to provide equitable access to deaf people.

**ACCESS TO 711 AND STATE TRS NUMBERS**

The Commission requests information about what it can do to promote the availability of assistive technologies in correctional facilities. HEARD’s original comment, provided data indicating that nearly half of deaf inmates surveyed did not have access to TTY at their facilities. Prisoners at numerous facilities report having a TTY but not being able to connect to relay services as a result of ICS providers blocking relay numbers, while others report having to file written requests days in advance to use the. In states where rates are cheaper during the evenings and on the weekends, deaf prisoners cannot take advantage of these rates because staff is not present during those times.

The Commission asks what actions it can take to promote the availability of videophones and other assistive technologies in prisons. The first step should be ensuring that facilities understand their responsibility to provide deaf prisoners equal access to telecommunication services on par with that of their hearing counterparts. The next step would be informing prisons and ICS providers about what technology exists. HEARD has fielded numerous requests for information since the Commission’s August 10, 2013, “Workshop on Reforming Inmate Calling Services.” That being said, without first mandating access, the Commission leaves thousands of deaf prisoners exactly where they were prior to their decision regarding rates—completely disconnect.

**TRS COMPLAINTS AND REPORTING**

Currently, no entity is held accountable for ensuring that access to telecommunications is provided to people with disabilities. The Commission can generate a genuine sense of accountability simply by requiring ICS providers to collect and report data on calls made using relay service, especially if prisoners and family members are paying for the service. ICS providers who consistently demonstrate that they have accessible telecommunication systems for all prisoners could be required to report less frequently than ICS providers that perpetually violate federal laws protecting the communication access rights of people with disabilities.
The Commission’s existing consumer complaint procedures are sufficient to accommodate complaints with some minor additions. Specifically, the Commission should ask how long the prisoner has been without relay service or access. Secondly, the Commission should find out if there was a recent change in the ICS provider that led to the problem complained about.

Regulations that force companies and individuals to consider universal accessibility at the planning stages do well to guard against accessibility-based litigation and make for a more inclusive society more broadly. In this case, mandated telecommunication accessibility would almost necessarily force departments of corrections to begin to track and provide other services to prisoners with sensory disabilities. This sort of accessibility would likely lead to less abuse of prisoners with disabilities and lower recidivism of the same.

A present, ICS providers have no incentive to provide quality service or accessible phone calls. The insertion of videophone companies would create competition that possibly would encourage ICS providers to develop new and affordable video calling options for all prisoners. Finally, there is a great deal of information about the use of TTYs and relay service that can only be answered by ICS providers and prisons. Should the Commission mandate the submission thereof, it could use these data to make more informed decisions related to accessibility and service quality compliance in the future.

AVAILABILITY OF ASSISTIVE TECHNOLOGIES IN CORRECTIONAL FACILITIES

In HEARD’s original comments we provided comments or statements from at least seventy deaf prisoners. At least fifty other deaf men and women submitted comments independent from HEARD. Scores of organizations, family members, advocates and attorneys also submitted comments illustrating the scope of the problem. Again, HEARD submits a letter to the Commission with more than seven hundred signatures and letters from yet more deaf prisoners noting the complete lack of access to telecommunications provided by ICS providers across the nation. The dire need for videophones is apparent. The group in California states:

“We are no longer interesting nor wanting to have TTY to be part of our accommodated need. Since the people at CDCR’s (Calif. Dept. of Correctional & Rehab.) attitude toward the telecommunicate device under the ADA law, which they are providing TTY is consider “reasonable” accommodation. It means we couldn’t expect to have everything, as long we have TTY, thus we are stuck with it. I am asking you to focus on the videophone exclusively, disregard an obsoleted TTY. Your reason may to have TTY be part of the letter for the inmates with hard of hearing and doesn’t know any sign language, however they may would prefer using a VCO telecommunication device, not with a TTY anyway.”

One deaf man who serves as a teacher’s aid at a very large unit in Huntsville, Texas, wrote to HEARD on behalf of deaf men there stating:

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15 See attached letters from two prisons with large deaf units—one in Texas, another in California. Neither has a working TTY.
16 See Attached Letter from the Deaf Inmates at California Substance Abuse Treatment Facility, G-Yard, dated December 8, 2013.
I collected most Deaf inmates’ information for the Sign On Letter, as they were very eager to know about your diligent efforts to help ensure the TDCJ to provide us videophones. We do have TTY here, but it’s inaccessible. I have tried to use it on a number of times, but I couldn’t get through the relay service because it is totally inaccessible. So we gave up and allowed it to become obsolete and untouchable and useless. But with videophone, we are going to pull up our sleeves and work together to achieve the fairness in the TDCJ’s system. I think there are over sixty Deaf prisoners on this unit. Yes, I know that many, so let us think about the fairness all the deaf prisoners do deserve, which is reconnect with their loved ones through an accessible telecommunications.

Men and women across this nation have gone for months, and sometimes years, without communicating with their loved ones because of their disability. More than a cap on rates is necessary for people with disabilities to benefit from the Commission’s historic vote to create “just, reasonable and fair” ICS rates. Until the Commission finds a way to address the serious and sweeping accessibility concerns related to the absence of videophone technology in all but a handful of prisons in this nation, children will still not be able to connect to their deaf parents and deaf parents will not be able to connect with their children.

RECOMMENDATIONS

The Commission must ensure that its regulations touch every prisoner. Countless prisoners, family members and advocates have expressed frustration with the current system. Multiple Video Relay Service companies have installed and maintained videophones in prisons and jails on both short and long term basis. Prisons and jails with videophones and other auxiliary should serve as models for other facilities. It is possible for videophones to become standard in prisons and jails across the country. We urge the Commission to develop a robust national accessibility standard to guide ICS providers and prisons across this nation down the path of universal accessibility.

We strongly urge the Commission to use its authority to ensure that spirit and the letter of the Americans with Disabilities Act and Rehabilitation Act are followed by ICS providers. If necessary, the Commission should collaborate with the Department of Justice to remedy this systemic injustice.

For the foregoing reasons, HEARD suggests that the Commission mandate the following:

1) ICS providers ensure that deaf and hard of hearing prisoners, prisoners with deaf family members, and prisoners with speech challenges have access to videophones, captioned telephones, TTYs or other auxiliary aids;

2) ICS providers immediately add all relay numbers, including Spanish relay numbers, to its list of approved numbers;

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17 See Attached Letter from the Deaf Inmates at Estelle Unit, dated December 4, 2013.
18 A large group of deaf men at the Georgia State Prison have not had TTY access for several years.
3) ICS providers assemble and report data regarding rates for and complaints from prisoners with disabilities and their family members;

4) ICS providers should be required to assemble and report data regarding the number of phone calls placed using TTYs and videophones;

5) ICS providers should file with the FCC, periodic reports regarding all telecommunications access grievances filed by prisoners with sensory disabilities;

6) ICS providers and prisons should extend limits on telephone calls for deaf and hearing prisoners who use videophones or TTYs accordingly; and

7) No prisoner should pay additional fees to use relay service.

We thank you for the opportunity to comment on Inmate Calling Services for prisoners with disabilities. Please contact me if you require more information regarding HEARD’s comment.

Sincerely,

/s/

Talila A. Lewis, Founder & President
HEARD
P.O. Box 1160
Washington, DC 20013
Falila Lewis,

Sorry, I didn't write you sooner since I had been so busy with my ok and some diligent commitments, and not a while ago I finally had my chance to reduce my clutters after I completed some of my projects.

As promised, I collected most Deaf inmates' information for the Sign On Letter, so they were very interested to receive your updated newsletters and also were eager to know about your diligent efforts to help ensure the TDCJ to provide us videophones we do have TTY here, but it's inaccessible. I have tried to use it on a number of times, but I couldn't get through the Relay Service because it is totally inaccessible so, we gave up and allowed it become obsolete and untouchable and useless. But with videophone, we are going to pull up our sleeves and work together to achieve fairness in the TDCJ's system as you can see it in the petition that I got you over thirty Deaf prisoners who want to see it happen. Contact them all, please.

I will get you 20 more Deaf prisoners' information for the Sign On Letter later, and I couldn't get their information and, most importantly, their signatures because they were asleep in their cells while I was already collecting all the Deaf prisoners who were in the dayroom. However, I'm going to ask the other twenty Deaf prisoners for their information and signatures, and then I'll send you the list.

I think there are over sixty Deaf prisoners on this unit. Yes, I know that many, so let us think about the fairness all the Deaf prisoners do deserve, which is re-connect with their loved ones through an accessible telecommunications.

OK, please let me know if there is anything you need. Here's my new figure of "sign" peech... "Actually, I do have a sling but a rock." If you are familiar with one real story from the Old Testament, then you will perfectly well know what and who I am talking about. Take care of yourself and wish you well with your
Community Sign On Letter

1. Renny Harvard, P.O. Box 468, TDCJ # 11781867
2. Juan Martinez, Cell # 245, TDCJ # 530545
3. Jeremy Barron, Cell # 321, TDCJ # 1085441
4. Jimmie L. Roberson Jr., Cell # 115426, TDCJ # 133944
5. Ciggo Chew, Cell # 133944
6. Tony McKnight, Cell # 781305
7. Rene Espinoza, Cell # 1769180
8. Melvin Easley, Cell # 795367
9. Darrell Fontenoy, Cell # 1810305
10. Jerry Belton, Cell # 1755867, Gerry Belton
11. Warden William Price IV, Cell # 1546567, Warden Price
12. Donald Lee Reese, Cell # 2338665, Donald Reese
13. Thomas Shawn, Cell # 1865562, Thomas Shawn
14. Frank Lewis, Cell # 1557856, Frank Lewis
15. Kevin Hudson Jr., Cell # 1843625, Kevin Hudson
16. Darrell Kentle, Cell # 1841480, Darrell Kentle
17. Jose Aguilar, Cell # 1514036, Jose Aguilar
18. Jerry Duques, Cell # 1381597, Jerry Duques
19. E. Yalcin, Cell # 1564681, E. Yalcin
20. Archie Smith, Cell # 1483862, Archie Smith
21. Charles Shoemaker, Cell # 1340905, Charles Shoemaker
22. David Anness, Cell # 1547113, David Anness
23. Sonny Garcia, Cell # 1830504, Sonny Garcia
24. William Bryant, Cell # 1873420, William Bryant
25. Kelsey Davis, Cell # 1211007, Kelsey Davis
Dear Talila Lewis, President of HEARD,

I really appreciate to have your help and voice at the FCC for the access to the videophone in the prison facility. We, the deaf inmates at CSATF, G-Yard agreed earnestly with the Community Sign-On Letter. We also have a couple of questions and concerning with the four fundamental components of universally accessible Inmate Calling Service.

We are no longer interesting nor wanting to have TTY to be part of our accommodate need. Since the people at the CDCR's (Calif. Dept. of Correctional; Rehab) attitude toward the telecommunicate device under the ADA law, which they are providing TTY is consider “reasonable” accommodation. It means we couldn’t expect to have everything, as long we have TTY, thus we are stuck with it. I am asking you to focus on the videophone exclusively, disregard an obsolete TTY. Your reason may to have TTY be part of the letter for the inmates with hard of hearing and doesn’t know any sign language, however they may would prefer using a VCO telecommunication device, not with a TTY anyway.
The videophone system required to have a High Speed Broadband internet line. It doesn't through a regular telephone system, so the videophone doesn't have a telephone billing system on the internet line. In the letter you requested to have the rates charged for the videophone Calls. It may complicated our access with the videophone since our family, loved one, or friend using the videophone wouldn't able to collect the billing over internet Calls. Why didn't you just leave it out, lessen the complication as well barrier upon the videophone system.

Thank you for the Quarterly Newsletter, my heart and thought to the family of McCay Vernon. I had an opportunity to read his book called "Deadly Charm" and some of his articles. We have been benefit the information with the habeas corpus, and variety legal process. I'm thankful for his devotion to our community.

I'm looking forward to receive your respond on the questions we asked you in this letter. I also want to let you know I will be released this March, 2014. Please continue stay in-touch with the deaf inmates at CSATF.

Sincerely,

[Signature]

ENCLOSED: HEARD's Community Sign-On Letter with inmates signatures
At base, the Commission must employ its authority to mandate that:

(1) ICS providers ensure that deaf and hard of hearing prisoners, prisoners with deaf family members, and prisoners with speech challenges have access to videophones, captioned telephones, TTYs and other auxiliary aids;

(2) ICS providers reduce rates charged for videophone and TTY such that family members of deaf prisoners pay the same amount for the same amount of communication;

(3) ICS providers immediately add all relay numbers, including Spanish relay numbers, to its list of approved numbers; and

(4) ICS providers assemble and report data regarding rates for and complaints from prisoners with disabilities and their family members.

Anything short of a Commission order mandating these four fundamental components of universally accessible Inmate Calling Services will leave countless prisoners and their family members exactly where they were prior to the Commission’s decision—disconnected. Universal accessibility is part and parcel of fairness and the rights of people with disabilities should not be disregarded for regulatory convenience.

The Commission has the authority to ensure that individuals with disabilities have equal telecommunication access and we are calling upon you to ensure that prison telecommunication is affordable and universally accessible—that fair reaches all, not some.

Sincerely,

Talila A. Lewis, President, HEARD

&

the Undersigned Individuals and Organizations

* Tyson Hopper T-96471  
 * Jay Baldridge AG-3432  
 * Clemente De Leon #AB4912  
 * Allen Fisher K75306  
 * Juan Rivera AD8230  
 * DuBose Scarbrough AE8111  
 * Chris Gomez F-1604  
 * Francisco Sotierre F69808  
 * Quentin Thompson AD 8538  
 * Robert Roselli G-57613  
 * K. Michael E-03947  
 * Steven Rodrigues T-44111  

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