EXHIBIT D

Summary of Intrastate Local Rate Restrictions

Summary of State Local Rate Restrictions

State	Local Call Rate	Average % Local Calls	Average % Local Minutes	Authority for Rate Limitation
North Carolina	$1.71 per call	85%	87%	**North Carolina Public Utilities Commission Rate Cap:** NCUC Rule R13-9(d), approved May 1, 2008, capped local rate for ICS providers at Windstream Concord Telephone Rate.
Georgia	$2.70 per call	71%	72%	**Georgia Public Service Commission Rate Cap:** ICS local rate capped at current level in Docket 14530-U and affirmed in Docket 18870-U.
Virginia	$1.00 - $1.25 per call	86%	86%	**Market regulation:** No state-imposed rate cap in place directly applicable to ICS; but jails require rates which are comparable to dominant ILEC collect calling rates in Virginia, which are among the lowest in the nation.
South Carolina	$2.60 per call	74%	76%	**South Carolina Public Service Commission Rate Cap:** The South Carolina PSC caps ICS local rates based on LEC operator assisted rates. The BellSouth rate for local collect calls ($2.50 surcharge plus $0.10 local dial rate) was established as the rate cap in Docket No. 90-305-C Order No. 91-122 in 1991. While the order stands, the SC PSC continues to enforce the $2.50 per call rate, but does not enforce the $0.10 per call message rate. However, virtually every jail facility in SC requests local rates at or below the AT&T/BellSouth tariffed rate.
Florida	$2.25 per call	86%	88%	**Prior PSC Rate Cap Followed by Market Regulation:** The Florida Public Service Commission established a local rate cap of $2.25 per call, which remained in effect until July 1, 2011, when legislation removed this authority from the PSC. Existing contracts carry forward the prior restriction and Florida jails continue to require local collect rates at or below this level.

Client	15 Minute Local Collect Calls						
	Client	ST	Rate	Per Minute	Percent Calls	Percent Minutes	Summary
1	[redacted]	FL	$2.25	$0.15	77%	81%	Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the Florida Public Service Commission and the Federal Communications Commission." LEC operator assisted rates tariffed at $1.75 plus $0.50 local dial rate.
2	[redacted]	FL	$2.50	$0.17	78%	81%	Contract specifically establishes local rate of $2.25 for local calls. Otherwise, contract provides: "Call rates shall be fair and reasonable and in compliance with all federal, state, and local telecommunications regulations." LEC operator assisted rates tariffed at $1.75 plus $0.50 local dial rate. Facility has permitted $0.25 additive to defray specific technology costs.
3	[redacted]	FL	$2.50	$0.17	86%	88%	Contract specifically sets local rate cap of $2.25. Otherwise, contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the Florida Public Service Commission and the Federal Communications Commission." LEC operator assisted rates tariffed at $1.75 plus $0.50 local dial rate. Facility has permitted $0.25 additive to defray specific technology costs.
4	[redacted]	FL	$2.50	$0.17	84%	86%	Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the Florida Public Service Commission and the Federal Communications Commission." LEC operator assisted rates tariffed at $1.75 plus $0.50 local dial rate. Facility has permitted $0.25 additive to defray specific technology costs.

5	[redacted]	FL	$2.25	$0.15	87%	87%	Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the Florida Public Service Commission and the Federal Communications Commission." LEC operator assisted rates tariffed at $1.75 plus $0.50 local dial rate.
6		FL	$2.25	$0.15	97%	98%	Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the Florida Public Service Commission and the Federal Communications Commission." LEC operator assisted rates tariffed at $1.75 plus $0.50 local dial rate.
7		FL	$2.25	$0.15	84%	89%	Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the Florida Public Service Commission and the Federal Communications Commission." LEC operator assisted rates tariffed at $1.75 plus $0.50 local dial rate.
8		FL	$2.25	$0.15	92%	95%	Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the Florida Public Service Commission and the Federal Communications Commission." LEC operator assisted rates tariffed at $1.75 plus $0.50 local dial rate.
9		FL	$2.25	$0.15	86%	89%	Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the Florida Public Service Commission and the Federal Communications Commission." LEC operator assisted rates tariffed at $1.75 plus $0.50 local dial rate.
10		FL	$2.50	$0.17	85%	90%	Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the Florida Public Service Commission and the Federal Communications Commission." LEC operator assisted rates tariffed at $1.75 plus $0.50 local dial rate. Facility has permitted $0.25 additive to defray specific technology costs.

11	[redacted]	FL	$2.25	$0.15	83%	87%	Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are equal to or less than the tariffed rates regulated by the Federal Communications Commission and any similar State agency." LEC operator assisted rates tariffed at $1.75 plus $0.50 local dial rate.
12		FL	$2.25	$0.15	87%	90%	Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the Florida Public Service Commission and the Federal Communications Commission." LEC operator assisted rates tariffed at $1.75 plus $0.50 local dial rate.
124	[redacted]	SC	$2.60	$0.17	87%	88%	Local surcharge for ICS calls is capped at LEC tariffed rate of $2.50 plus LEC local dial rate of $.10 per call. Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the South Carolina Public Service Commission and the Federal Communications Commission."
125		SC	$2.85	$0.19	88%	92%	Local surcharge for ICS calls is capped at LEC tariffed rate of $2.50 plus LEC local dial rate of $.10 per call. Facility has approved $0.25 additive to support specific technology.
126		SC	$2.60	$0.17	86%	93%	Local surcharge for ICS calls is capped at LEC tariffed rate of $2.50 plus LEC local dial rate of $.10 per call. Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the South Carolina Public Service Commission and the Federal Communications Commission."

127	[redacted]	SC	$2.60	$0.17	84%	84%	Local surcharge for ICS calls is capped at LEC tariffed rate of $2.50 plus LEC local dial rate of $.10 per call. Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the South Carolina Public Service Commission and the Federal Communications Commission."
128		SC	$2.60	$0.17	22%	23%	Local surcharge for ICS calls is capped at LEC tariffed rate of $2.50 plus LEC local dial rate of $.10 per call. Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the South Carolina Public Service Commission and the Federal Communications Commission."
129		SC	$2.85	$0.19	81%	85%	Local surcharge for ICS calls is capped at LEC tariffed rate of $2.50 plus LEC local dial rate of $.10 per call. Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the South Carolina Public Service Commission and the Federal Communications Commission." Facility has approved $0.25 additive to support specific technology.
130		SC	$2.60	$0.17	86%	91%	Local surcharge for ICS calls is capped at LEC tariffed rate of $2.50 plus LEC local dial rate of $.10 per call. Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the South Carolina Public Service Commission and the Federal Communications Commission."
131		SC	$2.60	$0.17	83%	84%	Local surcharge for ICS calls is capped at LEC tariffed rate of $2.50 plus LEC local dial rate of $.10 per call. Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the South Carolina Public Service Commission and the Federal Communications Commission."

132		SC	$2.60	$0.17	77%	80%	Local surcharge for ICS calls is capped at LEC tariffed rate of $2.50 plus LEC local dial rate of $.10 per call. Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the South Carolina Public Service Commission and the Federal Communications Commission."
133							Facility contract is no longer in place.
134		SC	$2.60	$0.17	76%	87%	Local surcharge for ICS calls is capped at LEC tariffed rate of $2.50 plus LEC local dial rate of $.10 per call. Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the South Carolina Public Service Commission and the Federal Communications Commission."
135		SC	$2.60	$0.17	39%	33%	Local surcharge for ICS calls is capped at LEC tariffed rate of $2.50 plus LEC local dial rate of $.10 per call. Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the South Carolina Public Service Commission and the Federal Communications Commission."
136							Facility contract is no longer in place.
140		VA	$1.75	$0.12	97%	97%	Contract provides: "The Vendor shall provide rates that mirror or are lower than the dominant carrier rates."
141		VA	$2.25	$0.15	90%	91%	Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the Virginia State Corporation Commission and the Federal Communications Commission."

142	[redacted]	VA	$2.25	$0.15	95%	97%	Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the Virginia State Corporation Commission and the Federal Communications Commission."
143		VA	$1.50	$0.10	79%	81%	RFP Specified $1.50 local rate; Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the Virginia State Corporation Commission and the Federal Communications Commission."
144		VA	$2.25	$0.15	82%	84%	Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the Virginia State Corporation Commission and the Federal Communications Commission."
145		VA	$2.25	$0.15	79%	81%	Contract requires adherence to the RFP. RFP requires "Contractor shall agree that the rates charged for inmate calls shall not exceed the Dominant Carrier rates…"
146		VA	$2.25	$0.15	96%	97%	Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the Virginia State Corporation Commission and the Federal Communications Commission."
147		VA	$2.25	$0.15	95%	96%	Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the Virginia State Corporation Commission and the Federal Communications Commission."
148		VA	$3.10	$0.21	9%	9%	Rate was specified during the RFP process and included in the Contract.
149		VA	$2.25	$0.15	94%	95%	Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the Virginia State Corporation Commission and the Federal Communications Commission."
150		VA	$2.40	$0.16	69%	73%	Rate was specified during the RFP process and included in the Contract.

151	[redacted]	VA	$1.50	$0.10	94%	96%	Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the Virginia State Corporation Commission and the Federal Communications Commission." Parties agreed to charge the Verizon rate of $1.00 plus a $0.50 local message rate.
152		VA	$2.25	$0.15	93%	95%	Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the Virginia State Corporation Commission and the Federal Communications Commission."
153		VA	$1.50	$0.10	93%	94%	Contract provides: "3.2.1 Local Collect Call - $1.50 flat rate per call…."
154		VA	$1.25	$0.09	95%	96%	AT&T Rate was specified during the RFP process. Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the Virginia State Corporation Commission and the Federal Communications Commission."
155		VA	$2.25	$0.15	88%	90%	Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the Virginia State Corporation Commission and the Federal Communications Commission."
156		VA	$2.25	$0.15	87%	88%	Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the Virginia State Corporation Commission and the Federal Communications Commission."
157		VA	$2.50	$0.17	88%	90%	Contract provides: "Pay Tel agrees to charge operator assisted rates for inmate phone calls that are tariffed rates regulated by the Virginia State Corporation Commission and the Federal Communications Commission." Facility has approved $0.25 additive to support specific technology.

158	[redacted]	VA	$1.75	$0.12	84%	85%	Contract provides: "The Vendor shall provide rates that mirror or are lower than the dominant carrier rates." Facility has approved $0.25 additive to support specific technology.