

SECURUS TECHNOLOGIES, LLC
4000 International Parkway
Carrollton, TX 75007

September 23, 2021

VIA ELECTRONIC FILING SYSTEM

Hon. Michelle L. Phillips
Acting Secretary to the Commission
New York Public Service Commission
Empire State Plaza
Agency Building 3
Albany, New York 12223-1350

Re: Securus Technologies, LLC
Proposed Tariff Revisions

Dear Ms. Phillips,

Please find the following proposed tariff revisions to Securus Technologies, LLC's ("Securus") New York Public Service Commission Tariff No. 1. The revisions proposed in this tariff filing are to comply with the recent Federal Communications Commission ("FCC") order regarding incarcerated calling services ("ICS"). In 2021, the FCC issued new ICS call rate caps applicable to most ICS and requiring the application of an end-to-end analysis to determine call jurisdiction, as well as new disclosure requirements for customer bills.¹ Except for reducing the rate caps applicable to ICS calls from prisons and jails, these revisions neither affect the current authorized ancillary service charges under this tariff nor change the underlying services Securus is providing under the tariff. Accordingly, Securus respectfully requests the filing be allowed to take effect by the end of the statutory notice period with an effective date of October 26, 2021 (the effective date for implementing the FCC requirements).

Leaves affected by this filing include the following:

- Section 1 Leaf 1 Revision 2 adding the definition of Average Daily Population (ADP).
- Section 1 Leaf 3 Revision 1 adding the definition of Site Commission.
- Section 5 Leaf 3 Revision 1 updating the Federal Cost Recovery Charge percentage rate.
- Section 6 Leaf 1 Revision 1 adding a new provision to Section 6.0 RATES AND CHARGES regarding the FCC's exercise of jurisdiction over ICS calls of indeterminate jurisdiction, Securus' compliance with FCC ICS call rate cap requirements, adding a table of the FCC's rate caps, and removing the existing rates.

¹ *Rates for Interstate Inmate Calling Services*, WC Docket No. 12-375, Third Report and Order, Order on Reconsideration, and Fifth Further Notice of Proposed Rulemaking, FCC 21-60 (released May 24, 2021).

The requested effective date for this filing is October 26, 2021.

Securus sincerely appreciates your attention to this matter. If for any reason this tariff filing is suspended, Securus requests it be allowed to go into effect on an interim basis. If you have questions regarding this filing, please contact me at (972) 277-0565 or by email at mlozich@securustechnologies.com. You may also contact Debbie Conde, Senior Regulatory Analyst at (972) 277-0395 or by email at dconde@securustechnologies.com.

Respectfully submitted,

/s/ Michael S. J. Lozich

Sr. Corporate Counsel & Director of Regulatory and Governmental Affairs