

SECURUS TECHNOLOGIES, LLC
4000 International Parkway
Carrollton, TX 75007

February 25, 2021

VIA ELECTRONIC FILING SYSTEM

Received: 02/25/2021

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. Leaves affected by this filing include the following:

- Section 0 Leaf 3 Revision 1 updating the Table of Contents.
- Section 1 Leaf 1 Revision 1 updating the definition of Authorized Fee and adding the definition of Consumer.
- Section 1 Leaf 2 Revision 1 adding the definition of Mandatory Tax or Mandatory Fee to conform to the Federal Communications Commission ("FCC") definition at 47 CFR § 64.6000(n).
- Section 5 Leaf 2 Revision 2 replacing Section 5.6 (Taxes) with a new provision stating that Securus' practices regarding charging and collecting governmental taxes and fees will comply with FCC incarcerated calling services ("ICS") rules; clarifying that Securus will charge and collect any applicable federal, state, or local tax or fee; and describing Securus' general practice of applying taxes and fees in addition to tariffed rates and charges. Securus' is making this change in connection with the FCC's expansion of the Telecommunications Relay Service Fund contribution base to include intrastate call revenues¹ and Securus applying the Federal Cost Recovery Charge for purposes of passing along these charges to consumers (without markup) as an Authorized Fee in conformance with the FCC's ICS rules, and updating the Universal Service Fund percentage.
- Section 5 Leaf 3 Revision 0 adding new Section 5.8 (Federal Cost Recovery Charge).

¹*Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, Report and Order, FCC 19-118 (released November 25, 2019).

- Section 5 Leaf 3 Revision 0 adding new Section 5.9 (Ancillary Service Charges) reflecting the FCC's determination that ICS ancillary service charges are considered jurisdictionally mixed and subject to FCC jurisdiction, and Securus' compliance with FCC ICS rules applicable to those charges.²
- Section 9 Leaf 1 Revision 1 removing language regarding the application of taxes and fees to Prepaid Calling Cards and Debit Accounts, now addressed in Section 5.6 (described above).
- Section 9 Leaf 3 Revision 1 rebranding the Inmate Debit product as Securus Debit and removing language regarding the application of taxes and fees to that product, now addressed in Section 5.6 (described above).
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- Section 9 Leaf 4 Revision 1 removing language regarding the application of taxes and fees to AdvanceConnect Accounts, now addressed in Section 5.6 (described above).

The requested effective date for this filing is March 29, 2021.

Securus sincerely appreciates your attention to this matter. 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,



Michael S. J. Lozich

Sr. Corporate Counsel & Director of Regulatory and Governmental Affairs

²Rates for Interstate Inmate Calling Services, WC Docket No. 12-375, Report and Order on Remand and Fourth Further Notice of Proposed Rulemaking, FCC 20-111 (released August 7, 2020), ¶¶ 34-46, 53.