

# AN OPEN LETTER TO THE FCC

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Securus Technologies keeps incarcerated individuals connected to their loved ones by providing innovative technology to modernize correctional communications. Our goal is to provide **every incarcerated individual in the United States with smart devices** that connect them with communications tools, educational programming, job training, and other services **that prepare them to reenter society**. And we are in the process of lowering costs for our services to ensure they are truly accessible to everyone that needs them.

But to make that vision possible, we need a federal regulatory structure that ensures **consistency, transparency in pricing, and flexibility to meet the needs of local communities**. We are proud to work alongside the FCC to **drive real change** in our industry. We support the new regulations released by the FCC on July 28 and view them as a step in the right direction. The next step is for regulators, legislators, correctional agencies, justice-involved families, and technology providers to come together in a collaborative rulemaking process to create a final regulatory structure. In an effort to work collaboratively toward this goal, we are committed to the following:

## **Creating a Subscription Model**

Subscription calling plans, which allow incarcerated callers to pay a monthly fee rather than per-call, have been found to increase call time by 27% and reduce costs by 50% in a Securus pilot program. But outdated regulations currently prohibit subscription models in correctional institutions. **Securus believes the FCC should modernize its regulations to allow for a subscription model, as advocates and justice-involved families have been calling for, and we will be immediately filing for an exemption that will allow us to expand our existing subscription model.**

## **Phasing Out Site Commissions**

While many important corrections budgetary operations are currently funded by commissions on telecommunications, the increased costs run counter to our shared goals of affordability. Commissions currently account for 33 percent of the out-of-pocket consumer call charges on average and can rise to more than 70 percent in some jurisdictions. Securus wants to work with all stakeholders to eliminate commissions and we need to collectively find a way to honor affordability commitments and also raise funds for important programs. **Securus will pass the savings from the elimination of calling commissions and reductions in taxes and fees directly through to the consumer. The company will continue to honor our contractually established commissions and will work to find more transparent and direct budgetary funding for agency customers reliant upon those funds for rehabilitative and developmental needs.**

## **Capping Call Rates for Consistency**

Securus supports the FCC imposing caps on calling rates, as well as the government fees and taxes that drive up operating costs for providers, and therefore increase prices for consumers. For example, the Universal Service Fee supports critical infrastructure needs but is disproportionately impacting low-income families and has nearly doubled over the past three years. This would be a helpful step towards providing greater fairness and consistency across jurisdictions and create a level playing field for technology providers. **Securus will work with the FCC to create a data-driven model for call rates that serves incarcerated people and protects public safety after consulting with an independent third-party.**

The process of modernizing correctional communications will not be easy, but by working together, the FCC, state and local governments, and technology companies can create a system that provides essential communications, limits consumer costs, maintains public safety, and ultimately works better for all.