



July 31, 2014

**Re: RFP No. ADOC 14-00003887/14-066-24
Inmate Telephone System
Request for Clarification dated July 18, 2014**

Dear Ms. Yaw:

CenturyLink thanks the State of Arizona and the Department of Corrections for the opportunity to submit these answers to the State's clarifying questions.

As part of a Local Exchange Carrier serving most of Arizona's population, we are uniquely positioned to provide the highest level of service in addition to a very competitive financial offer. In addition, we believe we are able to consistently meet or exceed all the State's requirements and desired features/services.

Please do not hesitate to contact me or Senior Account Manager Vicki Johnson at 859.734.9424 if you require any additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul Cooper".

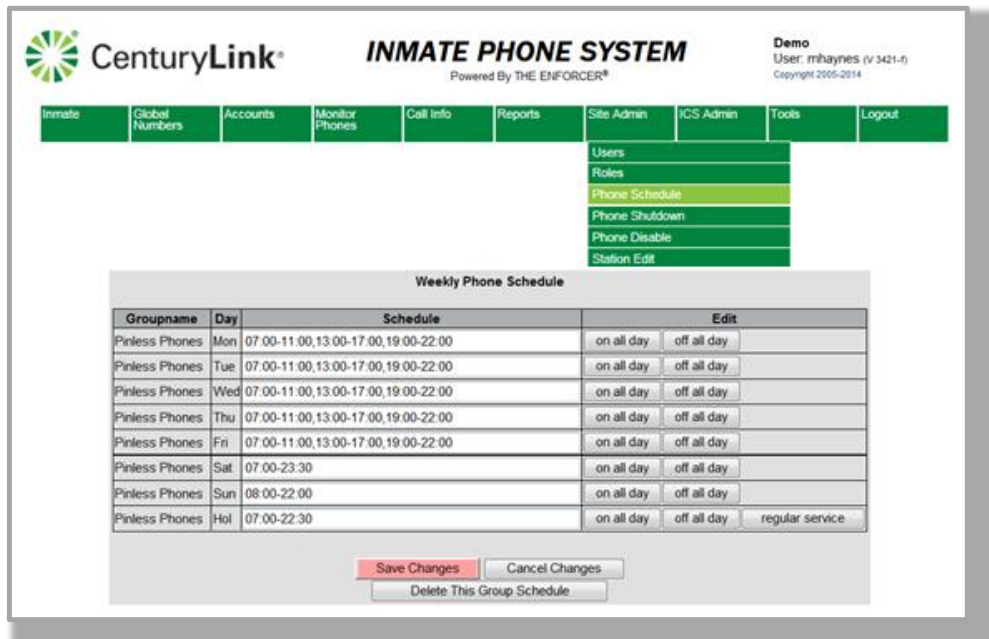
Paul Cooper, General Manager
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Tab 3 Scope of Work-Technical Requirements

- 1) Section 2.4.3.10 On the daily automatic turn on and off, does it has the ability to set for multiple time per day?

CenturyLink response: Yes. The following example illustrates a group of phones that are turned off during lunch and dinner periods (11:00 – 13:00 and 17:00 – 19:00) Monday through Friday, but are available during lunch and dinner on Saturday, Sunday, and holidays. These time blocks are simply separated by a comma in the fields within the phone schedule screen.

The “Groupname” is a specific group of inmate telephones defined by the Department. Typically a physical facility will have several groups defined, for example, Dayroom 2A, Medical, Segregation, etc. Each Department facility can have their own defined groups, and there is no limit to the number of groups that can be implemented.



Weekly Phone Schedule Screen

- 2) Section 2.4.3.24 Please explain the automatic deletion of numbers for family members who block future calls from the inmate (page 25 of your proposal).

CenturyLink response: When a called party answers the phone, they receive automated voice prompts that offer several options, including the options to “block all future calls from this facility” by dialing the designated single-digit code on their telephone dial pad. The called party is prompted twice to prevent accidental blocking. The voice prompts that the called party would hear are included to illustrate the “double” prompting:

Hello, you have a collect\prepaid\debit call from [*inmates name*], an inmate at [*facility name*]
 To accept this call, Press 5”
 To refuse this call, hang up now”
 To block this call and future calls from this facility, Press 9

If called party presses 9 on keypad:
 To block this call and all future calls from this inmate, Press 7
 To Block this call and all future calls from this facility, Press 9

If called party presses 7 on keypad:
 You have chosen to block calls from this inmate, Press 1 if this is correct. Press 3 to return to the previous menu

If called party presses 9 on keypad:
 You have chosen to block calls from this facility, Press 1 if this is correct. Press 3 to return to the previous menu

If the called party selects the option to block future calls from this inmate, their telephone number is automatically blocked (placed in “keypad block” status) from future calling from that inmate, with no Department staff intervention necessary. The number is not deleted, but placed in “block” status.

If a number is blocked, the family member can simply call our call center to get their number unblocked. Information on how to get numbers unblocked is on our website, and should the Department wish, the State’s website can be linked to our website.

The following screen illustrates an active number and a number that is in keypad block status. The blocked number can quickly be unblocked by selecting “Not Blocked” from the drop-down menu.

Personal Allowed/Blocked Numbers (PANs)													
Edit PANs...		PAN History											
Pan Num	Phone Number	Active	Speed Dial	Name	Relationship	Block	Global Entries	Call Type	Date Approved	Approved By	In Use	Address	Description
1	1-210-581-8105	<input checked="" type="checkbox"/>				Not Blocked		All	07/23/2014 06:17:31	johng	1		
Inactive PANs are shown below		Hide Inactive PANs											
2	+79788074147	<input type="checkbox"/>				Keypad		All	07/24/2014 09:50:04	Isteger	1		

Personal Allowed/Blocked Numbers Screen

If the Department would like to be notified of these blocking events, the IPS can be configured so that the database entry event (blocking future calls from the inmate) triggers an alert that automatically notifies designated Department staff.

Summary:

- The called party is double-prompted prior to either refusing a single call from an inmate or blocking all future calls from an inmate or facility. This reduces the probability that family members incorrectly or inadvertently block all future calls from Department facilities.
- If a called party refuses all future calls, history is preserved by placing the number into keypad block status for review by authorized staff.
- Business rules for automated blocking, notifications to designated staff, etc. can easily be configured from within the system.
- If a called party incorrectly or inadvertently blocks all future calls from an inmate or the Department, our call center or on-site administrators are always available to unblock the number in a timely fashion.

3) Is continuous voice biometric monitoring available and is it at an additional cost?

CenturyLink response: Yes, continuous voice biometric monitoring is available to the Department. Because it involves third party royalty payments, the implementation of continuous voice biometrics would impact our commission offer. “Pre-call” or “voice print” voice biometrics is also available, and at no impact to our commission offer.

With over 50,000 inmates using continuous voice biometrics on the Enforcer system, CenturyLink and ICSolutions are the most experienced implementers of this technology and have built the required server infrastructure to accommodate this resource-intensive service.

4) Section 2.4.10.1 Can CenturyLink provide a WinTel 7090SSE telephone? Is there a security reason why this phone should not be used?

CenturyLink response: Yes, the WinTel 7090SSE can be provided for Department facilities. There are no security issues with using the 7090SSE and its installation would not impact our financial offer.

5) Section 2.4.17.14 Payment options - Is this direct billing with CenturyLink or with incumbent local exchange companies (ILECs) and competitive local exchange companies (CLECs)?

CenturyLink response: These collect billing arrangements are with CenturyLink, Inc.’s traditional phone service unit as *well* as other ILECs and CLECs.

If we do not have a third-party billing arrangement for an end-user’s telephone service (such as a cell phone company), the called party will be automatically routed to a call center representative who will walk the called party through the simple

process for setting up a prepaid account. Per RFP requirements, there will be no setup or other transaction fees for managing collect services or prepaid accounts.

6) Would CenturyLink provide the Department a list of facilities that use the ICS platform?

CenturyLink response: The table below provides information on state DOC accounts that have the ICS Enforcer currently installed. In addition, CenturyLink is in the process installing the Enforcer platform at the Idaho Department of Correction under a five year contract. This installation will support approximately 7,300 inmates at 15 sites with 550 phones. Note that the contracts for Iowa, New Hampshire, and Wyoming are held directly by ICSolutions.

The Enforcer was also installed at the Illinois Department of Corrections under a contract with Illinois-based LEC Consolidated Communications, before the contract was lost due primarily to pricing. Illinois DOC has 30 facilities and approximately 49,000 inmates. A letter describing the Enforcer's historical performance in Illinois is attached at the end of this response.

Finally, the platform is in use at an additional 150 county facilities that house close to 100,000 inmates.

CenturyLink uses the Enforcer platform exclusively on all new business due to its proven revenue performance (due to its unique prepaid collect call routing and setup process), rich feature set, stability, and support from developer ICSolutions.

State Departments of Correction with Enforcer Inmate Telephone System			
Account	Sites	Population	Phones
Alabama DOC	29	25,000	1,171
Kansas DOC	13	9,500	967
Nevada DOC	18	12,800	678
Iowa DOC	9	8,500	415
New Hampshire DOC	4	2,550	246
Wyoming DOC	5	1,950	87

7) Does CenturyLink have the ability to import call data and recordings from the previous vendor for use?

CenturyLink response: Yes. This process requires only (1) a standard readable file format including historical call detail records and (2) recordings in a non-proprietary playable format from the outgoing vendor. Based on the sample file formats received, CenturyLink would translate/normalize the outgoing vendor's data format to the Department's new IPS platform. Prior to actually deploying the IPS, we will perform a robust series of tests to

ensure accuracy of all data transferred.

CenturyLink would not charge the Department or the outgoing vendor for performing this work. This importing of historical data is in addition to the standard process of transferring over data such as PINs, allowed numbers (PANs), and global numbers such as attorneys from the previous provider.

Should CenturyLink be awarded this contract and subsequently lose it at a later date, we commit to work with the incoming vendor to transfer all of the State's data to the new vendor. CenturyLink would not charge the State or the incoming vendor for this service.

8) Does the Department have the ability to view commission reports online?

CenturyLink response: Yes. The Department would have the ability to view all historical commission reports online. The Department would also have access to real-time gross revenue reports throughout the month so staff could forecast commission performance using mid-month data.

9) Does CenturyLink block for uncollected calls when billed through a LEC or CLEC?

CenturyLink response: CenturyLink does not "block" calls without a customer being given an opportunity to be brought to "current" status. If a LEC/CLEC-billed call comes back to us as unpaid, we place a "soft block" on the line, so that next time the person receives an inmate call, the family member is routed into our call center to pay their bill and be brought to current status.

The bottom line is that with the Enforcer call routing engine, no customer is ever "hard blocked" – that is, blocked without being given the opportunity to bring their account to cleared/current status to continue receiving calls.

Another billing rule to note is that if the inmate is utilizing their debit account to pay for the call and the called party's account is still in bad payment status, CenturyLink will allow that call to go through. This is because the party in non-payment status is the family member, not the inmate paying for the call.

10) Please confirm in detail the assistance in repair of infrastructure of inmate telephone post installation at no additional cost to the Department.

CenturyLink response: As part of a Local Exchange Carrier (LEC) serving most of Arizona's population, CenturyLink provides a unique set of capabilities in this area.

First, CenturyLink's ADOC-dedicated service technicians are available for use by the Department in whatever capacity they are needed by the Department – including the repair of ADOC-internal telecommunications infrastructure.

Second, CenturyLink management has an expedited escalation channel within

CenturyLink, Inc.'s Arizona LEC operations should the Department experience issues with any CenturyLink, Inc. services.

Finally, as discussed in our conference call and for those facilities in CenturyLink, Inc. LEC territory, we are able to provide labor and consultation for cable maintenance issues (materials excluded, except by mutual agreement) at Department facilities. These services would be provided even if the cable is ADOC-owned, and would broadly include use of our equipment for cable location, consultation regarding splicing or routing, etc. as required by the particular situation. For contractual purposes, we request the ability to cap this assistance to no more than three (3) instances per year. However, we commit to working with the Department if further assistance is needed.

For out-of-territory facilities, CenturyLink cannot expressly commit to this type of assistance. However, we offer to assess each out-of-territory situation on a case-by-case basis with the Department. All ADOC facilities except for ASP-Apache, ASP-Ft. Grant, and the Kingman facility are in CenturyLink, Inc. LEC territory.

All services described above would be at no cost to the Department and no impact to our financial offer.

11) Please confirm there are no transaction fees, ancillary fees, billing fees, nor any other types of fees billed to the Family and Friends.

CenturyLink response: Confirmed. CenturyLink will not charge any of these fees to Family and Friends. In addition, we have successfully operated a no-fee billing program at Kansas DOC since 2007. Our compliance with this no-fee policy is tested regularly by internal and external resources, and we have never been found to be out of compliance with this requirement.

12) Does FCC allow commission to be paid on interstate calls and are they included in your offer?

CenturyLink response: Yes. Commission is allowed on all call types, including interstate, under currently implemented FCC rules. Two points comprehensively summarize this conclusion:

1. In the FCC's *Report and Order* (FCC 13-113, released September 26, 2013), the FCC's commentary expressly states that the Commission declines to prohibit commissions on any call types:

"We do not conclude that ICS [inmate calling service] providers and correctional facilities cannot have arrangements that include site commissions. We conclude only that...such commission payments are not costs that can be recovered through interstate ICS rates." (¶ 56) [emphasis added]

2. Further and very important, the *Report and Order* was appealed at the D.C. Circuit

Court of Appeals. As part of the appeal, critical components of the *Order* were stayed by the Court. In particular, the rules that ICS rates must be “cost-based” were stayed and as a result, the determination that site commissions are not recoverable costs currently has no legal effect. That is, the rules that certain providers use to claim that interstate site commissions cannot be paid are not in effect today.¹

Finally, on July 21, 2014 the FCC reiterated its position on commissions in its brief for the Circuit Court appeal. The full document is available at:
http://transition.fcc.gov/Daily_Releases/Daily_Business/2014/db0722/DOC-328365A1.pdf.
See especially:

(p. 17) “...the Order does not bar inmate calling providers from having ‘arrangements’ with correctional facilities ‘that include site commissions’...”

(p. 63) “...the Order neither bars inmate calling providers from continuing to pay site commissions out of their profits, nor restricts how correctional facilities spend such payments.”

CenturyLink takes compliance with FCC rules, as well as its inmate communications contracts, very seriously and conducted lengthy and thorough analysis of the *Report and Order* and the Circuit Court’s partial stay. That analysis concluded that we could not refuse to pay interstate commissions based on the portions of the FCC *Report and Order* that were allowed to go into effect. This conclusion was made despite the fact that refusing to pay interstate commissions would clearly be in CenturyLink’s financial interest.

Regarding commission on interstate calls, interstate commissions were not included in our original offer in order to maximize our evaluation under the RFP’s rules.

¹ Pages 1-88 of the *Report and Order* are simply commentary and explanation from the FCC regarding the actual rules to go into effect. The actual rules, six in total, are on pages 89-91 of the document - three of which were importantly stayed by the Court. The stayed rules were:

- §64.6010 (“Cost-Based Rates for Inmate Calling Services”) which states rates must be based on costs “reasonably and directly related to providing ICS services”;
- §64.6020 (“Interim Safe Harbor”) which defines safe harbor rates at which providers are “presumptively in compliance with §64.6010”; and
- §64.6060 (“Annual Reporting and Certification Requirement”) which defines annual reporting requirements as well as providers’ certification that they are compliant with rules including §64.6010

See full text at https://apps.fcc.gov/edocs_public/attachmatch/FCC-13-113A1.pdf. The Circuit Court’s partial stay is at https://apps.fcc.gov/edocs_public/attachmatch/DOC-325090A1.pdf.

ADDITIONAL INFORMATION



P.O. Box 7001, Mattoon, IL 61938-7001
www.consolidated.com
Tel 800 235 4416

January 15, 2013

Re: Inmate Calling Services

Dear Procurement Officer:

Consolidated Communications Public Services, Inc. (CCPS) is the contract holder to provide inmate telecommunications services to the Illinois Department of Corrections (IDOC). This covers 46 facilities, which houses 49,000 inmates and provides services to over 2,000 inmate telephones.

CCPS searched for a business partner with an exceptional service record and advanced technology to meet the ever changing needs to the corrections market. After a thorough evaluation, ICSolutions was chosen in December of 2009. The ICSolutions ENFORCER[®] system was successfully implemented statewide and all site personnel trained by May of 2010.

CCPS has been very pleased with ICSolutions' service and support during the implementation and in the subsequent years of service. They continue to enhance their services by making new technologies available and tailoring them to fit our specific needs for the IDOC. Their prepay product design has increased the overall revenue stream, which results in higher commissions to the state of Illinois.

The IDOC continues to praise the ENFORCER[®] system for its ease of use and reliability. The investigators are extremely pleased with all the features that streamline the live monitoring and recording capture. The ability to rapidly search and download recordings has been critical to the shrinking investigative workforce in Illinois.

If you have any further questions, please do not hesitate to contact me at my office at (217) 258-2986 or via email at kelly.cole@consolidated.com.

Sincerely,

A handwritten signature in black ink that reads "Kelly J. Cole". The signature is written in a cursive, flowing style.

Kelly J. Cole
CCPS General Manager