

# EXHIBIT 13

Comments re Second Further Notice of Proposed Rulemaking:  
Single Call Programs, January 12, 2015

*Complaints to the Better Business Bureau about Securus single-call products*

**PRISON**  
POLICY INITIATIVE

05/30/2014

Billing / Collection Issues | [Read Complaint Details](#)



### Complaint

False advertising

on April 1st I set up an account with Securus. I paid with my Visa credit card. I based my purchase on that fact that I was quoted by the Securus website rate calculator, that each call would cost \$3.15 for 15 minutes to my phone number. However when the first call came through the automated voice said the charge for the call was \$9.95 plus taxes for 5 mins. I declined that call. The following calls came in stating the same \$9.95 + tax for 5 mins. I then contacted Securus. It is impossible to speak with a human however, I managed to chat with a rep (I have a printout of the chat conversation) during which the rep said everything was set up ok and I shouldn't be experiencing this problem. However, future calls came in stating the cost for the 5-min call would be \$9.95 plus tax. I did not accept the calls.

Since no calls were ever accepted by me I request a full refund to my Visa account.

### Desired Settlement

I made my decision to purchase call time based on false info contained in their website (again I have a picture of what was quoted) yet what they charge in actuality are much higher, I want a full refund of \$36.95 credited to my Visa account.

### Business Response

May 27, 2014

Dear Dir. \*\*\*\*\*

Securus Technologies, Inc., with its customer service department, Securus Correctional Billing Services, (collectively, "Securus"), hereby responds to \*\*\*\*\*'s complaint regarding her account involving collect

calls accepted from Mercer County Sheriff's Office located in Celina, OH. Securus is an inmate telephone service provider that handles inmate collect calls from this confinement facility.

According to Ms. \*\*\*\*\*'s complaint, she indicates calls to her telephone number have been blocked and she would like the issue resolved.

Investigation into this matter finds AdvanceConnect prepaid account number XXXXXXXX was established in the

name of \*\*\*\*\* on May 2, 2014 for billed telephone number XXX-XXX-XXXX.

Ms. \*\*\*\*\* created her account via the web on May 2, 2014 and made a payment adding \$30.00 to the account.

The account was set up and billed telephone number XXX-XXX-XXXX was ready to receive calls. The telephone number XXX-XXX-XXXX was inadvertently not added to her account. Her loved one was calling telephone

number XXX-XXX-XXXX which was not on the account.

Securus then provided calls through its Instant Pay program. It allows customers an opportunity to receive calls from their loved ones if they do not have a Securus account or are blocked.

The Instant Pay program called "Text2Connect" is put into place when a detainee attempts to make a call and

the call cannot be connected because either the called party does not have an account with SCBS or the prepaid account balance is insufficient to pay for the call. In Ms. \*\*\*\*\*'s case, when there are insufficient funds in her account to accept a collect call, Securus automatically provides a method of continuing to get calls

under Instant Pay™ Program with Pay Now™ and Text2Connect™. When an inmate at a Securus-

managed corrections facility places a collect call to friends or family (F&F), the called party pays for the call using a credit

card or they may choose to open an account with Securus for future calls. Prior to accepting the charge, the inmate's name and the name of the correctional facility from where they are calling are announced to the called party through the ADS. Prior to the acceptance of each call, the called party is advised of the cost of the

call and the maximum allotted call time as dictated by the correctional facility from which the call originates. If

the called party does not wish to accept the call or set-up an account for future calls, they simply hang-up and

no charges are incurred.

This program is able to connect a call made to a mobile phone through the acceptance of a text message. Charges for the messages are billed by their mobile provider on their mobile phone bill in the amount of \$9.99.

To ensure that they don't get blocked from future calls due to max call limits with this service, the consumer is

also made aware that Securus is the inmate telephone service provider for that confinement facility that connects inmates to Friends and family if they open an Advance Connect account.

It is also important to note the difference in the way her calls were charged. If the call came through as Text2Connect, her mobile phone provider would charge her \$9.99 for each call. We have nothing to do with the billing of those calls. However, if she accepted a collect call, then we would bill her Advance Connect prepaid account.

She has not accepted any of the Text2Connect calls. Her loved one has chosen to make his calls through the Inmate Debit platform. Multiple good calls have been made using this calling option.

On May 12, 2014, Securus added billed telephone number XXX-XXX-XXXX to her account per this BBB complaint. From that point forward, the calls will be funded from the \$30.00 that still remains on her account

if her loved one chooses to call collect and not through the Inmate Debit platform.

Securus will be reviewing the handling of Ms. \*\*\*\*\*'s chat into its call center to make sure it was being handled

in an accurate and a professional manner. If any problems are uncovered, corrective actions will be taken.

Securus sincerely regrets Ms. \*\*\*\*\*'s confusion and frustration regarding the number issue pertaining to her

account. If there should be any other questions or concerns, she may contact us at XXX-XXX-XXXX or via chat at

www.securustech.net.

Sincerely,

\*\*\*\*\* \*\*\*\*\*

Escalations Specialist

#### **Consumer Response**

(The consumer indicated he/she DID NOT accept the response from the business.)

Dear Director \*\*\*\*\*

Thank you for your attempt to resolve this matter. However, I do not accept Securus's reply for the reasons listed below.

1. The problem should have been resolved during the 'chat session'.
2. Please review my complaint. Is Securus able to find anywhere in the complaint where I said "calls to telephone number have been blocked"?
3. In an attempt to get help with fixing the problem, I immediately notified Securus via the chat on May 2nd. When I was unable to get them to resolve the problem, I notified the BBB on May 8th. They choose to ignore both of us.
4. In their reply to the BBB they state on May 12th they took (unauthorized) liberty of 'fixing' the problem by adding the 'billed' telephone number XXX-XXX-XXXX to my account. Here's an interesting question....if the wrong number was truly the issue why then why didn't the Securus Chat rep address this at the time of the chat?
5. If what they state is factual and that is that (XXX)XXX-XXXX was in fact the number on the account, who authorized Securus on May 12th, to arbitrarily add a phone number to the account? They state that the 'billed' telephone number was (XXX) XXX-XXXX which indicates they knew the correct number from the time of account set-up.
6. Why did they wait until May 12th (ironically the inmate was released that very day), especially since the issue was brought to their attention beginning on May 2, and again on May 9th and again on May 27th?
7. As a matter of interest, either of the phone numbers would be a charge of \$3.15....not \$9.95.

Again, thank you for your help.

Regards,  
\*\*\*\*\* \*\*\*\*\*

<http://www.bbb.org/dallas/business-reviews/telephone-companies/securus-technologies-in-dallas-tx-4100098/complaints>

08/04/2014

Billing / Collection Issues | [Read Complaint Details](#)



### Complaint

Billed for services never received.

I opened an account today and was charged \$14.45. \$6.95 was some processing fee and \$7.50 was the pre-paid balance I put on the account. However, they charged me for a call in the amount of \$4.84 even though the call was never connected to me. I was told to choose option 1 which I did and that the call would then be connected. I kept saying hello and waiting but never was connected to anyone. Then was told I needed to put more money on the account and refused to credit the account back after I explained no call was ever connected. They also give a phone number to call \*\*\*\*\* that states if you need a refund but when you call that number its some other company and claims they do not issue refunds for Securus Tech. I apparently still have a balance of \$2.66 on the account and cannot get anyone to explain how to even refund that. I made several phone calls and submitted a form online and have got no where. I did close the account online but that was all I got accomplished.

### Desired Settlement

I would like \$14.45 for a full refund as I was never able to use their service and was charged for services never received.

### Business Response

July 22, 2014

Dear Dir. \*\*\*\*,

Securus Technologies, Inc., with its customer service department, Securus Correctional Billing Services, (collectively, "Securus"), hereby responds to \*\*\*\*'s complaint regarding her account involving collect

calls accepted from Denton County Pre-Trial Facility located in Denton, TX. Securus is an inmate telephone

service provider that handles inmate collect calls from this confinement facility.

According to Ms. \*\*\*\*'s complaint, she indicates they were unable to hear each other on a call to her telephone number and she would like a refund.

Investigation into this matter finds \*\*\*\*\* prepaid account number \*\*\*\*\* was established in the

name of \*\*\*\* on July 5, 2014 for billed telephone number \*\*\*\*\*. She requested that her account be closed later that day.

The one call that was made was reviewed and Ms. \*\*\*\*\* could not hear her loved one. The actual cause of the low volume could not be determined.

Date Time Orig. City, ST Term. ANI Term. City, ST Type Mlns Cost Tax Total

7/5/2014 16:00:00 DENTON, TX \*\*\*\*\* LOC 4 \$2.50 \$0.35 \$2.85

Ms. \*\*\*\*\* disputed the payment with her financial institution in the amount of \$11.79 which was the \$14.45

payment and fee minus the available balance on her account of \$2.66. Securus removed the \$11.79 from her account leaving an outstanding balance of \$4.84.

As a one-time courtesy, Securus has credited her account for the one call at \$2.85 and the \$1.99 Wireless Administration Fee for July totaling \$4.84. Her outstanding balance went from \$4.84 to \$0.00.

Ms. \*\*\*\*\*'s loved one began calling on July 5, 2014 and made multiple attempts through July 6, 2014.

Securus provided calls through its Instant Pay program. It allows customers an opportunity to receive calls from their loved ones if they do not have a Securus account or are blocked.

To provide some background about our business, inmate collect call are traditionally completed from Securusmanaged

correctional facilities only when if there is a way for the called party to be billed by the local exchange carrier ("LEC") or if money exists on a prepaid account with Securus. If the calls cannot be billed they

are blocked by the inmate telephone system and in most cases the called party is not aware that an attempt has been made by an inmate to contact them. As an additional billing option, Securus may offer the "Pay Now"

program for the un-billable call attempts. The "Pay Now" program provides an additional option for the called

party to instantly accept a single call in real-time as the call is being initiated. Additionally, the "Pay Now" program and is only offered for calls that would normally have been blocked and doesn't change the way in which prepaid and post-paid calls are processed today.

Under the "Pay Now" program, when an inmate at a Securus-managed corrections facility places a collect call

to friends or family (F&F), the called party pays for the call using a credit card or they may choose to open

an account with Securus for future calls. Prior to accepting the charge, the inmate's name and the name of the correctional facility from where they are calling are announced to the called party through the \*\*\*. Prior to the acceptance of each call, the called party is advised of the cost of the call (a flat rate of \$14.99) and the maximum allotted call time as dictated by the correctional facility from which the call originates. If the called

party does not wish to accept the call or set-up an account for future calls, they simply hang-up and no charges are incurred.

The \*\*\*\*\* telephone number provided was for Instant Pay Support. No Instant Pay - Pay Now or Text2Connect calls were accepted and billed. No funds would have been paid using her credit card and needed to be refunded.

Securus sincerely regrets Ms. \*\*\*\*\*'s frustration regarding the troubled call. If there should be any other questions or concerns, she may contact us at \*\*\*\*\* or via live chat at [www.securustech.net](http://www.securustech.net).

Sincerely,

\*\*\*\*\*

Escalations Specialist

**Consumer Response**

(The consumer indicated he/she DID NOT accept the response from the business.)

I have no credit on my account for the \$11.79 from Securus that they claim in this response was removed from my account. My bank issued a temporary credit for this amount pending their own investigation. The only credit Securus issued on my account was the \$2.66 that was the balance on my account. I'm still waiting for the \$11.79 to be credited.

05/12/2014

Problems with Product / Service | [Read Complaint Details](#)



### Complaint

The service is not easy to use. It takes you part way through setting up the account online, then you have to call because the site doesn't work correctly. It took 3 times to set up the account. When trying to use the service, it would not work. I asked to talk with someone about refunding my money and processing fee of \$9.95 because the service did not work. I was told to just go on the website to request to chat with someone, they could not do this over the phone. The only way The phone service would work is if I accepted a \$15 charge for each time the phone was used.

Account\_Number: Customer Number: C-

### Desired Settlement

I would like the refund for the \$9.95 processing fee, and the \$15 charge that I had to accept to receive a phone call that lasted a minute. I also would have it required that the website is redesigned so it works like the find answer/ help section says to do it.

### Business Response

May 2, 2014

Dear Dir. Stallings,

Securus Technologies, Inc., with its customer service department, Securus Correctional Billing Services, (collectively, "Securus"), hereby responds to \*\*\*\*\*'s complaint regarding his refund request involving

collect calls from Brown County Work Release Center located in Green Bay, WI. Securus is an inmate telephone

service provider that handles inmate collect calls from this confinement facility.

According to Mr. \*\*\*\*\*'s complaint, he indicates he requested a refund for the funds he was unable to use. Investigation into this matter finds Advance Connect Prepaid account number XXXXXXXX was established in the

name of \*\*\*\*\* on April 4, 2014 for billed telephone number XXX-XXX-XXXX.

Mr. \*\*\*\*\*'s account was funded in the amount of \$15.00 on April 4, 2014. He closed his account and requested

a refund for the available balance on April 9, 2014. On April 24, 2014, the refund of \$15.00 was researched and

fully processed. It was credited back to the credit card (xxxxxxxxxxxx1873) that he used to make the payment on

April 4, 2014.

Mr. \*\*\*\*\*'s loved one was attempting to call using his own Inmate Debit account which did not have any funds

to make calls. He then attempted to make a collect call to Mr. \*\*\*\*\*'s telephone number but was diverted to the Instant Pay - Pay Now platform due to the fact that there was no Securus account set up to pay for the calls.

Mr. \*\*\*\*\* set up and funded his AdvanceConnect account. He was ready to receive calls. However, his loved

one went back to making his call attempts with his Inmate Debit account which still did not have any funds. He

did try making a collect call which would have gone through but he incorrectly entered his inmate PIN number.

Securus sincerely regrets Mr. \*\*\*\*\*'s confusion and frustration regarding the processing of the calls and the handling of his refund. If there should be any other questions or concerns, he may contact us at XXX-XXX-XXXX

or via chat at [www.securustech.net](http://www.securustech.net).

Sincerely,

\*\*\*\*\*

\*\*\*\*\*

Escalations Specialist

01/02/2014

Billing / Collection Issues | [Read Complaint Details](#)



### Complaint

Im being charged by text collect 9.99 for a collect call when securus service this facility and i already have an exsiting account with securus

I am an existing account holder with Securus tech. A love one is in Jackson County Jail in Michigan.I received a collect call from her and as told I will be charged 9.99 thru text connect and i accepted the call. I then went on line an seen that Securus service this facility. I called Securus to see why was I charged by text connect if they service this facility and I already have an advance connect account.I was told by a Secure rep that I need to open another account, therefore she started me an online account and told me I can just go an add the michigan jail to my account. I was on the website for over 2 hours trying to figure out how to add a account. I called securus back and now I am being told by a different rep that it is only 1 account per house hold and that inmates are given options and she must be selecting the text to connect. When the inmate called me again I asked her is she is given option before the call go thru and she said no. Now I called Securus back for the 3rd x to talk to someone else, now this rep tell me she can just add the michigan call herself to my account and it should be deducted from my bill. IM waiting to see if that was the case I have not received another call from Michigan yet to see if it was done correctly. ThIs company along with text to connect doesn't have no oversight it should be against the law for any company to charge this much money to speak to an inmate over the phone. This company along with text connect are praying on the poor and vurnaable and no senator or representative from any state is doing anything about it. Please someone look into the business practices of this company. When you call to speak to a manager they will not let you speak to anyone. I even sent an email to customer care and received an email back from Tasha stating I need to contact text to connect since they are billing me. I contacted them first and was told to contact Securus. MY complaint is why am I being charged by a different company when I have and advance connect account already (and yes money is in my account)9.99 when i talk to the first rep for Securus she told me it will be 4.95 to set up another account and I will be charged 89 cents a minute . it still a steep price to talk to some one in jail but its better than being charged 9.99 for five minutes.I will be contacting the attorney general and getting a petition started for someone to take a second look at this and other companies like this .Securus has 99% of all jail account therefor they don,t have much competition so there customer service is rude and the prices are ridicules. Please help ,we are just trying to provide support to love ones. And please don't tell me its because i received the call on my cell phone i receive my other calls that are collect on my cell phone and it comes thru as saying this is Securus .

### Desired Settlement

I am requesting the settlement I paid for @ collect call Im also requesting a manager look into what they representative a telling customer. i should not have to call your company an email your company to get a different answer from everyone i talk to. Since you service Jackson County Jail In Michigan I should have be charged thru my account that I already have.^m quite sure im not the only customer who is experirncing this problem with your company.

### Business Response

December 24, 2013

Dear Dir. Stallings,

Securus Technologies, Inc., with its customer service department, Securus Correctional Billing Services, (collectively, "Securus"), hereby responds to Ms. \*\*\*\*\*'s complaint regarding payment issues to her

account involving collect calls accepted from Illinois Department of Corrections (IL DOC) - Sheridan Correctional

Center, located in Sheridan, IL. Securus is an inmate telephone service provider that handles inmate collect calls

from this confinement facility.

According to Ms. \*\*\*\*\*'s complaint, she indicates that she paid for a Text2Connect™ call she received from her

loved one. She also mentions in her complaint that she received she received conflicting information from Customer Care representatives in the customer service center. She would like the matter investigated.

Investigation into this matter finds AdvanceConnect prepaid account number XXXXXXXX was established in the

name of \*\*\*\*\* on July 18, 2013 for billed telephone numbers XXX-XXX-XXXX and XXX-XXX-XXXX.

The two telephone numbers that Ms. \*\*\*\*\* has on her account are being called from inmates at multiple facilities. As long as there are sufficient funds in her AdvanceConnect account, calls will be automatically made

using the funds in her account. For her convenience, the rates are being provided below.



The rates for her Intralata collect calls from the IL DOC - Sheridan Correctional Center to her two telephone

numbers are as follows:

IL DOC - Sheridan Correctional Center

Located in Sheridan, IL

XXX-XXX-XXXX

XXX-XXX-XXXX

Operator Service Charge: \$3.55 (per call) Operator Service Charge: \$3.55 (per call)

Usage Charge: \$0.00 (first minute) Usage Charge: \$0.00 (first minute)

\$0.00 (ea additional minute) \$0.00 (ea additional minute)

For a 30-minute maximum duration call, the charge would be \$3.55 plus applicable taxes and fees.

The rates for her out of state collect calls from the Jackson County Jail to her two telephone numbers are as follows:

Jackson County Jail

Located in Jackson, MI

XXX-XXX-XXXX

XXX-XXX-XXXX

Operator Service Charge: \$4.24 (per call) Operator Service Charge: \$4.24 (per call)

Usage Charge: \$0.89 (first minute) Usage Charge: \$0.89 (first minute)

\$0.89 (ea additional minute) \$0.89 (ea additional minute)

For a 24-minute maximum duration call, the charge would be \$25.60 plus applicable taxes and fees.

The rates for her out of state collect calls from the Wayne County Jail - William Dickerson Detention Center to

her two telephone numbers are as follows:

Wayne County Jail - William Dickerson Det Center

Located in Hamtramck, MI

XXX-XXX-XXXX

XXX-XXX-XXXX

Operator Service Charge: \$0.00 (per call) Operator Service Charge: \$0.00 (per call)

Usage Charge: \$0.48 (first minute) Usage Charge: \$0.48 (first minute)

\$0.48 (ea additional minute) \$0.48 (ea additional minute)

For a 20-minute maximum duration call, the charge would be \$9.60 plus applicable taxes and fees.

The Instant Pay program called "Text2Connect" is put into place when a detainee attempts to make a call and

the call cannot be connected because either the called party does not have an account with SCBS or the prepaid

account balance is insufficient to pay for the call. In Ms. \*\*\*\*\*'s case, when there are insufficient funds in her

account to accept a collect call, Securus automatically provides a method of continuing to get calls under Instant

PayTM Program with Pay NowTM and Text2ConnectTM. When an inmate at a Securus-managed corrections facility

places a collect call to friends or family (F&F), the called party pays for the call using a credit card or they may

choose to open an account with Securus for future calls. Prior to accepting the charge, the inmate's name and

the name of the correctional facility from where they are calling are announced to the called party through the

AOS. Prior to the acceptance of each call, the called party is advised of the cost of the call and the maximum

allotted call time as dictated by the correctional facility from which the call originates. If the called party does

not wish to accept the call or set-up an account for future calls, they simply hang-up and no charges are incurred.

This program is able to connect a call made to a mobile phone through the acceptance of a text message. Charges for the messages are billed by their mobile provider on their mobile phone bill in the amount of \$9.99.

To ensure that they don't get blocked from future calls due to max call limits with this service, the consumer is

also made aware that Securus is the inmate telephone service provider for that confinement facility that connects inmates to Friends and family if they open an Advance Connect account.

It is also important to note the difference in the way her calls were charged. If the call came through as Text2Connect, her mobile phone provider would charge her \$9.99 for each call. We have nothing to do with the billing of those calls. However, if she accepted a collect call, than we would bill her Advance Connect prepaid account is.

As an additional billing option, Securus may offer our "Pay Now" program for the un-billable call attempts. The

"Pay Now" program provides an additional option for the called party to instantly accept a single call in real-time as the call is being initiated. Additionally, the "Pay Now" program and is only offered for calls that would normally have been blocked and doesn't change the way in which prepaid and post-paid calls are processed today.

Under the "Pay Now" program, when an inmate at a Securus-managed corrections facility places a collect call to

friends or family (F&F), the called party pays for the call using a credit card or they may chose to open an account with Securus for future calls. Prior to accepting the charge, the inmate's name and the name of the correctional facility from where they are calling are announced to the called party via an Interactive Voice Response (IVR) system. Prior to the acceptance of each call, the called party is advised of the cost of the call (a

flat rate of \$14.99) and the maximum allotted call time as dictated by the correctional facility from which the call

originates. If the called party does not wish to accept the call or set-up an account for future calls, they simply

hang-up and no charges are incurred.

Ms. \*\*\*\*\* also stated that she would like the opportunity to choose a different provider and believes she and

others are forced to utilize our service. Securus would like to clarify for Ms. Warden that IL DOC, Wayne County,

MI and Jackson County, MI all participated in a competitive bidding process to select an inmate telephone service provider. In compliance with this process, Securus was one of the inmate phone providers that submitted a competitive proposal to the facility. They then used their own criteria for evaluating all competitive

bids, which resulted in Securus being selected as the inmate telephone service provider. Securus is far from controlling 99% of the market place as she stated in the complaint. The inmate telephone service industry has

multiple competing companies that have various accounts across the country.

Securus will be reviewing the handling of Ms. \*\*\*\*\*'s telephone calls into its call center to make sure they were handled in a professional and accurate manner. If any problems are uncovered, corrective actions will be taken.

Securus sincerely regrets any inconvenience and frustration Ms. \*\*\*\*\* has endured relative to this matter. If

she has any further questions or concerns, she may contact us at XXX-XXX-XXXX or via chat at [www.securustech.net](http://www.securustech.net).

Sincerely,

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Corporate Escalations Specialist