

EXHIBIT 14

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

Executive Summary to Securus RFP response to Wayne County MI

PRISON
POLICY INITIATIVE

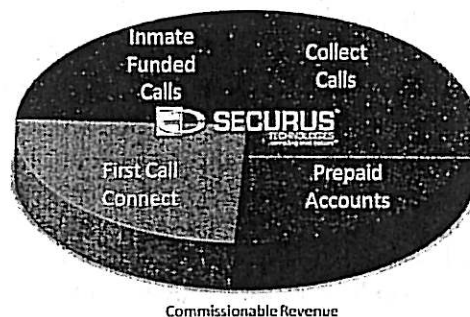
Executive Summary

Securus is pleased to provide our proposal to Wayne County, MI. Securus has spent over 25 years committed to becoming the premier inmate telecommunications provider. We will strive to build our partnership with the following proposal that will demonstrate:

- Securus will provide Wayne County with the best overall commission package.
- With the most robust national AND local support, Securus provides Wayne County with the best experience and qualifications.
- With the most widely deployed inmate calling platform and remote video visitation solution in the Country, Securus will provide the best network infrastructure and management to increase communications and decrease recidivism.
- As the industry leader in technology development Securus will bring the best technical solution both today and into the future AND we can deliver a best in class Jail Management System through our partnership with Archonix to meet a current County need.
- Securus is the vendor of choice for delivering our platform with a precision plan that is on time.

Best Overall Commission Package - Revenues that Go Beyond Percentage

During these difficult economic times Securus understands that every dollar of revenue is critical to our County partners. While many vendors are content with throwing out a commission rate, Securus has focused our total solution to optimize commissions across each and every calling opportunity. It is also critical to understand that no commission is made until a call is completed, so Wayne County will benefit from the vendor that provides the greatest number of call completions across each call category—*Securus is that vendor.*



Traditional Collect Calls – Our industry was founded on the collect call. As the largest provider of County inmate phone systems we have more collect billing arrangements than any other provider. More billing arrangements equates to more opportunities to connect those ongoing calls.

Prepaid Accounts – As more and more people have moved to non-traditional phone providers and cell phone services, the need for prepaid accounts has grown dramatically. Securus has kept up with that demand with myriad prepaid funding options, including our approximately 200 person

customer service center in Dallas, Texas. Additionally, we provide funding through our Web site, the U.S. Postal Service, 46,000 Western Unions, 35,000 MoneyGram locations, as well as lobby kiosks and Automated Information Services (AIS) funding. We even provide proactive marketing programs to ensure caring friends and family members can always take a call from those incarcerated. Once again, no vendor can match Securus when it comes to establishing and maintaining prepaid accounts.

Connecting That Difficult First Call and Calls to Cell Phones – In today's era of cell phones and non-traditional providers, connecting that first call to a phone number that can't receive a collect or prepaid call has proven difficult for most providers. Securus has developed multiple industry first solutions that optimizes the routing of all calls from your facility and provides the called party with promotional messaging and multiple options. For cell phones, we can provide the called party with an option to accept a promotional connection on their wireless phone and be billed by their wireless carrier. Additionally, we can provide the called party with a 20-second promotional call every 15 to 30 days at no charge, then offers the option to be transferred to our Customer Service center to Open an AdvanceConnect™ account or simply pay for the call right there via credit card. No vendor can come close to matching our ability to connect calls.

Inmate-Funded Calling Options - Enabling inmates to use their own funds to make their own calls has proven to be a high growth opportunity. Once again Securus provides multiple solutions. Prepaid cards and prepaid card kiosks are one solution. Securus provides these options but again goes above and beyond. Inmate Debit allows inmate calling to be accessed through their trust or commissary account. Securus uses a team of integration specialists to build custom solutions to enable debit calling and will work closely to customize an inmate debit program for Wayne County. Unlike competitors who will force a "one size fits all" solution, we provide multiple inmate debit options depending upon integration requirements. That flexibility ensures that if an inmate wants to make a call, that call can be completed.

Securus – The Best Experience, Qualifications Nationally and in Michigan

Serving approximately 2,200 correctional facilities and 850,000 inmates including 65 counties in Michigan and the Midwest's largest facility, Cook County, makes Securus the largest independent provider of inmate telecommunications services to correctional facilities in the United States and Canada. By developing and owning more than 90 technology patents along with approximately 35 patents pending with the U.S. Patent Office, Securus is without a doubt the leading technology innovator in our industry and has been providing inmate telephone system services for more than 25 years. Virtually every large inmate telecom provider in our industry relies on Securus for technology development and uses our patented technologies under our license agreements. Correctional facilities have come to rely on the technology Securus develops to not only provide inmates and friends and family members vital telephone service, but to assist the law enforcement community in solving and preventing crimes.

Securus' national presence is reflected in the following figure.