

# PRISON POLICY INITIATIVE

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February 25, 2021

Marlene Dortch, Secretary  
Federal Communications Commission  
45 L St., NE  
Washington, DC 20554

**VIA EFCS ONLY**

Re: *Ex Parte* Submission  
WCB Dkt. No. 12-375  
Transaction Fees Reported by Global Tel\*Link

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 1.1206(b), the Prison Policy Initiative writes to highlight certain information that is relevant to the rulemaking pending in the above-referenced proceeding. Specifically, our examination of public filings by carrier Global Tel\*Link (“GTL”) reveals highly questionable practices regarding ancillary fees that are regulated under 47 C.F.R. § 64.6020.

We would point to the publicly-available annual report filed by GTL pursuant to 47 C.F.R. § 64.6060, and available at <https://www.fcc.gov/ecfs/filing/1023328412861>. As you know, this annual report contains redacted information about rates, fees, contracts, partnerships with ICS providers, site commissions, and disability access. We wanted to draw the Commission’s attention to the inexplicably high third-party financial transaction fees disclosed in this document in connection with 140 correctional facilities (we have listed details of these facilities in the attached summary).

These fees often approach \$10 per transaction — and in one case, rise to \$12.95 per transaction — which is concerning because we know of no bona fide payment processor that charges such high transaction fees for this type of routine consumer payment. Based on our investigation, it appears that GTL doesn’t accept MoneyGram, and as we found in *State of Phone Justice: Local jails, state prisons and private phone providers*<sup>1</sup>, Western Union charges consumers \$6.95 to send payments to GTL. Therefore, we are unable to conceive of a scenario in which third-party financial transaction fees would ever be higher than \$6.95.

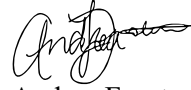
On January 21, 2021, we contacted GTL to meet and confer regarding this data, in an effort to narrow the issues in the pending rulemaking. As of the date of this letter, we have received no further clarification from GTL. For that reason, we

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<sup>1</sup> Available at [https://www.prisonpolicy.org/phones/state\\_of\\_phone\\_justice.html](https://www.prisonpolicy.org/phones/state_of_phone_justice.html)

suggest that the Commission investigate these cause of these suspiciously high fees and determine whether any of the revenue generated by these fees is shared with GTL.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrea Fenster", with a decorative flourish extending to the right.

Andrea Fenster  
Staff Attorney

## GTL Facilities Charging High Third-Party Financial Transaction Fees, 2019

*This table includes all facilities where the maximum third-party financial transaction fee charged was above \$6.95. Western Union charges consumers \$6.95 to send payments to GTL, so it is unclear why any third-party fees would be higher than this amount. This list was compiled using data from GTL's 2019 Annual Report to the FCC available at <https://www.fcc.gov/ecfs/filing/1023328412861>.*

Facility Name	Facility Type	ADP	Disclosed Third-Party Financial Transaction Fees
Aiken County SC	Jail	407	\$0.01 - \$9.99
Albany County WY	Jail	51	\$0.01 - \$7.95
Allegan County Corrections Center MI	Jail	196	\$0.01 - \$7.95
Aransas County TX (Rockport, TX)	Jail	212	\$0.01 - \$7.95
Austin County TX (Bellville, TX)	Jail	3	\$0.01 - \$7.95
Baker County OR	Jail	29	\$0.01 - \$7.95
Bandera County TX	Jail	53	\$0.01 - \$7.95
Bannock County ID	Jail	330	\$0.01 - \$7.95
Bingham County ID	Jail	119	\$0.01 - \$7.95
Blaine County ID	Jail	55	\$0.01 - \$7.95
Bonner Co Detention Center ID	Jail	122	\$0.01 - \$7.95
Bonneville County Jail ID	Jail	402	\$0.01 - \$7.95
Boyle County Detention Center KY	Jail	360	\$0.01 - \$8.95
Brevard County FL	Jail	1681	\$0.01 - \$7.95
Buffalo County NE	Jail	166	\$0.01 - \$7.95
Campbell County WY	Jail	179	\$0.01 - \$12.95
Canyon County ID	Jail	440	\$0.01 - \$9.95
Caribou County ID	Jail	36	\$0.01 - \$7.95
Caroline County MD	Jail	75	\$0.01 - \$7.95
CCNO, OH	Jail	630	\$0.01 - \$7.95
Charleston County SC	Jail	1050	\$0.01 - \$7.25
Chelan County WA	Jail	207	\$0.01 - \$7.95
City of Arlington TX	Jail	33	\$0.01 - \$7.25
City of Jacksonville FL	Jail	3363	\$0.01 - \$8.95
City of San Antonio TX Detention Center	Jail	200	\$0.01 - \$7.95
City of Zanesville OH	Jail	70	\$0.01 - \$8.95
Clackamas Co Jail OR	Jail	435	\$0.01 - \$7.95
Clarion County PA Correct Fac	Jail	102	\$0.01 - \$8.95
Clark County WA	Jail	701	\$0.01 - \$7.95
Coconino Co AZ	Jail	426	\$0.01 - \$8.95
Community Transitional Services	Jail	280	\$0.01 - \$7.95
Cumberland County NC	Jail	710	\$0.01 - \$8.95
Curry County Jail OR	Jail	35	\$0.01 - \$7.95
Davidson Co TN	Jail	3232	\$0.01 - \$7.95
Delaware County IN	Jail	280	\$0.01 - \$7.95

Deschutes County Adult Jail OR	Jail	286	\$0.01 - \$7.95
Dimmit County TX	Jail	84	\$0.01 - \$7.95
District 1 Juvenile Detention	Jail	15	\$0.01 - \$7.95
Douglas County Colorado	Jail	333	\$0.01 - \$8.95
Douglas County GA	Jail	683	\$0.01 - \$8.95
Effingham County Jail GA	Jail	190	\$0.01 - \$8.95
Effingham Prison, GA	Jail	192	\$0.01 - \$8.95
Elmore County ID	Jail	169	\$0.01 - \$7.95
Fayette County TX (La Grange, TX)	Jail	24	\$0.01 - \$7.95
Fayette County PA Jail	Jail	226	\$0.01 - \$9.99
Fremont County ID	Jail	40	\$0.01 - \$7.95
Gallatin County Jail MT	Jail	165	\$0.01 - \$7.95
Galveston County TX	Jail	844	\$0.01 - \$7.25
Genesee County Michigan Sheriff	Jail	617	\$0.01 - \$7.95
GEO Eagle Pass Correctional Facility	Prison	475	\$0.01 - \$7.95
Gillespie County Jail TX	Jail	88	\$0.01 - \$7.95
Glades County FL	Jail	500	\$0.01 - \$8.95
Gooding County ID	Jail	34	\$0.01 - \$7.95
Grant County WA	Jail	180	\$0.01 - \$8.95
Greene County Jail MO	Jail	754	\$0.01 - \$9.95
Hamilton County	Jail	498	\$0.01 - \$8.95
Hamilton County CC IN	Jail	498	\$0.01 - \$8.95
Harlan County Detention Center KY	Jail	225	\$0.01 - \$7.95
Henrico Co VA Sheriff's Ofc	Jail	1320	\$0.01 - \$8.95
Hood County TX	Jail	166	\$0.01 - \$8.95
Jefferson County ID	Jail	106	\$0.01 - \$7.95
Jerome County ID	Jail	107	\$0.01 - \$7.95
Jessamine County Detention Center KY	Jail	150	\$0.01 - \$7.95
Jones County TX	Jail	66	\$0.01 - \$7.95
Kalamazoo County Jail MI	Jail	420	\$0.01 - \$7.95
Kenosha County, WI	Jail	678	\$0.01 - \$8.95
Kentucky River Regional Jail KY	Jail	260	\$0.01 - \$7.95
Kirkwood P D MO	Jail	12	\$0.01 - \$9.95
Kitsap County WA	Jail	398	\$0.01 - \$7.95
Knox County Jail IN	Jail	297	\$0.01 - \$7.95
Kootenai County Jail ID	Jail	420	\$0.01 - \$8.95
Lafayette Parish Corrections LA	Jail	1030	\$0.01 - \$7.95
Lake County Jail IN	Jail	764	\$0.01 - \$9.95
Lane County Adult Corrections OR	Jail	442	\$0.01 - \$7.95
Latah County ID	Jail	35	\$0.01 - \$7.95
Lawrence County PA	Jail	197	\$0.01 - \$8.95
Lebanon County PA Corr Faculty	Jail	486	\$0.01 - \$8.95
Leslie County Detention Center KY	Jail	330	\$0.01 - \$7.95

Lewis County Jail WA CLOSED	Jail	228	\$0.01 - \$7.95
Linn County Jail OR	Jail	228	\$0.01 - \$7.95
Lucas County OH	Jail	389	\$0.01 - \$8.95
Luzerne County PA Corr Facil	Jail	520	\$0.01 - \$7.25
Madison Co IN Justice Center	Jail	170	\$0.01 - \$8.95
Madison County ID	Jail	110	\$0.01 - \$7.95
Madison County Jail KY	Jail	395	\$0.01 - \$7.95
Madison County TN	Jail	450	\$0.01 - \$7.25
Marion County KY	Jail	312	\$0.01 - \$7.95
Marshall County IN	Jail	254	\$0.01 - \$8.95
Meherrin River Regional VA	Jail	402	\$0.01 - \$8.95
Miami County IN (Closed)	Jail	186	\$0.01 - \$8.95
Miller County Jail GA	Jail	25	\$0.01 - \$8.95
Monroe County IN	Jail	239	\$0.01 - \$7.95
Montgomery County TN	Jail	550	\$0.01 - \$8.95
Montour County PA	Jail	40	\$0.01 - \$8.95
New Hampshire DOC	Prison	2520	\$0.01 - \$9.99
Nisqually Public Safety Complex WA	Jail	260	\$0.01 - \$7.95
NORCOR Adult Facility OR	Jail	168	\$0.01 - \$7.95
Nye County NV	Jail	143	\$0.01 - \$7.95
Okeechobee County Jail FL	Jail	270	\$0.01 - \$8.95
Oklahoma County OK	Jail	1605	\$0.01 - \$7.95
Orange County TX	Jail	201	\$0.01 - \$7.95
Outagamie County WI Sheriff	Jail	331	\$0.01 - \$7.25
Owyhee County Jail ID (Closed)	Jail	24	\$0.01 - \$7.95
Pamunkey Regional Jail VA	Jail	375	\$0.01 - \$7.95
Paulding County GA	Jail	300	\$0.01 - \$8.95
Payette County ID	Jail	78	\$0.01 - \$7.95
Pima County AZ	Jail	1926	\$0.01 - \$7.95
Pinellas Co FL	Jail	3113	\$0.01 - \$8.95
Polk County Jail OR	Jail	119	\$0.01 - \$7.95
Porter County Jail IN	Jail	337	\$0.01 - \$7.95
Power County ID	Jail	22	\$0.01 - \$7.95
Purgatory Correctional UT	Jail	430	\$0.01 - \$9.95
Robertson County TN	Jail	450	\$0.01 - \$8.95
Rock County WI	Jail	392	\$0.01 - \$8.95
Rusk County TX Jail	Jail	117	\$0.01 - \$8.95
Sanpete County Jail UT (Disabled)	Jail	109	\$0.01 - \$9.95
Santa Cruz County Jail AZ	Jail	400	\$0.01 - \$8.95
Seminole County GA	Jail	65	\$0.01 - \$8.95
Shoshone County Jail ID	Jail	45	\$0.01 - \$7.95
Shoshone-Bannock Tribes Corrections ID	Jail	25	\$0.01 - \$7.95
Somerset County PA	Jail	109	\$0.01 - \$7.95

South Correctional Entity WA	Jail	559	\$0.01 - \$9.99
Sutton County Jail TX (Sonora, TX)	Jail	30	\$0.01 - \$7.95
Sweetwater Detention Center WY	Jail	118	\$0.01 - \$7.95
Thurston County ARC WA	Jail	366	\$0.01 - \$7.95
Tillamook County OR	Jail	70	\$0.01 - \$7.95
Trumbull Co OH Jail	Jail	294	\$0.01 - \$7.25
Twin Falls ID	Jail	400	\$0.01 - \$7.95
Uintah County UT	Jail	222	\$0.01 - \$9.95
Umatilla County Jail OR	Jail	208	\$0.01 - \$7.95
Van Buren County Jail MI	Jail	172	\$0.01 - \$7.95
Vanderburgh CC IN	Jail	725	\$0.01 - \$7.95
Vanderburgh County IN	Jail	725	\$0.01 - \$7.95
Victoria Cnty. Jail, TX	Jail	340	\$0.01 - \$7.95
Victoria Juvenile TX	Jail	25	\$0.01 - \$7.95
Walton County FL	Jail	550	\$0.01 - \$8.95
Washington County ID	Jail	30	\$0.01 - \$7.95
Washington County OR	Jail	538	\$0.01 - \$7.95
Wayne County MI	Jail	1700	\$0.01 - \$7.95
Whitley County Jail IN	Jail	100	\$0.01 - \$8.95
Yellowstone County Detention Center MT	Jail	580	\$0.01 - \$7.95