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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

**Order Instituting Rulemaking to Consider
Regulating Telecommunications Services
Used by Incarcerated People**

Rulemaking 20-10-002

**THE PRISON POLICY INITIATIVE, INC.
COMMENTS ON THE ORDER INSTITUTING RULEMAKING
TO CONSIDER REGULATING TELECOMMUNICATIONS SERVICES
USED BY INCARCERATED PEOPLE**

Peter Wagner
Executive Director
Prison Policy Initiative, Inc.
P.O. Box 127
Northampton, MA 01060
(413) 527-0845
pwagner@prisonpolicy.org

Dated: November 9, 2020

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Pursuant to Rule 6.2 of the Public Utilities Commission’s Rules of Practice and Procedure, the Prison Policy Initiative (“PPI”) submits the following opening comments in response to the Commission’s Order Instituting Rulemaking, entered on October 19, 2020 (the “OIR”).

I. Introduction

The Prison Policy Initiative is a nonprofit organization that uses data analysis to demonstrate how the American system of incarceration negatively impacts everyone, not just incarcerated people. We publish research and participate in selected legal campaigns in order to create a fairer justice system through policy change. PPI has published three landmark reports on exploitation and dysfunction in the prison and jail telephone market, and has provided testimony and over two dozen written briefings to the Federal Communications Commission (“FCC”) in support of stronger regulations in the correctional telecom sector. We have also participated in a number of state regulatory proceedings regarding inmate communications services (“ICS”).

As the Commission notes in the OIR, this proceeding takes place within a larger context of regulatory reform in the prison and jail communications market.¹ Most notably, in 2015 the FCC issued a new body of rules governing ICS companies. The FCC issued its 2015 rules after

¹ See also Stephen Raher, [The Company Store and the Literally Captive Market: Consumer Law in Prisons and Jails](#), 17 *Hastings Race & Poverty L.J.* 3, 13-14 (2020) (summarizing recent developments).

concluding that ICS companies are common carriers subject to regulation under the federal Communications Act.² The federal rules seek to achieve reasonable rates through the use of per-minute rate caps and limits on the type and amount of ancillary fees.

While the FCC action was a welcome move after decades of inaction, a 2017 ruling by the Court of Appeals for the D.C. Circuit³ has refocused the regulatory landscape on the jurisdictional boundary between inter- and intrastate calling. The court’s ruling in *Global Tel*Link v. FCC* has emphasized the role that state regulators play in protecting incarcerated people and their friends and family who rely on telecommunications services to maintain relationships.

PPI applauds the Commission’s decision to conduct this rulemaking, and we look forward to the development of a public record upon which the Commission can rely when making decisions. In response to section 3.2 of the OIR, we respectfully submit the following responses to the four initial questions posed by the Commission.

II. Comments

A. The Commission Has Jurisdiction to Regulate ICS Carriers and Should Exercise Its Authority to Prohibit Unfair Rates and Practices in the Industry

As noted in the OIR, ICS carriers are “telephone corporations” subject to the Commission’s regulatory jurisdiction.⁴ As a result, the carriers must adhere to the general provisions of California’s utility statutes, including the requirement that their rates and practices be just and reasonable.⁵ In exercising its powers, the Commission is guided by the legislature’s declaration of telecommunications policy, which includes promoting “lower prices, broader

² *In the Matter of Rates for Interstate Inmate Calling Services*, WC Dkt. No. 12-375, [Report & Order and Further Notice of Proposed Rulemaking](#) [hereinafter “First Report & Order”] ¶¶ 13, 28 FCC Rcd. 14107, 14114 (Sep. 26, 2013).

³ *Global Tel*Link v. FCC*, 866 F.3d 397 (D.C. Cir. 2017).

⁴ OIR at 2; Cal. Pub. Util. Code § 233.

⁵ Cal. Pub. Util. Code § 451.

consumer choice, and avoidance of anticompetitive conduct,” “fair treatment of consumers,” and the equitable deployment of new technologies.⁶

Instead of repeating the details of the well-developed public record regarding the ICS industry, PPI will simply reiterate two central items that have been established as part of the FCC’s record and which remain uncontroverted even in the wake of the D.C. Circuit’s decision in *Global Tel*Link*.

First, while modern telecom policy often favors competition over rate regulation, this general model cannot be used in the ICS industry because of an undeniable market failure. There is no element of consumer choice,⁷ and calling services are delivered by ICS carriers on a monopoly basis, governed by long-term contracts with correctional facilities.⁸ The correctional facilities, in turn, often receive financial compensation in the form of “site commissions” (payments that, in our opinion, are more accurately characterized as kickbacks). Thus, the party in charge of selecting an ICS carrier often has financial interests (i.e., maximizing site commission income) that are directly in conflict with the end users (i.e., family members who deserve reasonable calling rates).⁹ Even policymakers who favor a restrained regulatory policy (including current FCC chair Ajit Pai) acknowledge that the ICS market cannot function fairly without rate regulation.¹⁰ The Court of Appeals likewise found that the FCC’s 2015 rules were designed to address a market failure.¹¹

⁶ *Id.* § 709.

⁷ *In the Matter of Rates for Interstate Inmate Calling Services*, WC Dkt. No. 12-375, [Report & Order on Remand and Fourth Further Notice of Proposed Rulemaking](#) [hereinafter “[Remand R&O](#)”] ¶ 5 (Aug. 7, 2020) (“Unlike virtually every other American . . . incarcerated people and the individuals they call have no choice in their telephone service provider.”).

⁸ First Report & Order ¶¶ 39-41, 28 FCC Rcd. at 14128-30; *Global Tel*Link v. FCC*, 866 F.3d at 404 (“Once a long-term, exclusive contract bid is awarded to an ICS provider, competition ceases for the duration of the contract and subsequent contract renewals. Winning ICS providers thus operate locational monopolies with a captive consumer base of inmates and the need to pay high site commissions.”).

⁹ First Report & Order ¶ 41, 28 FCC Rcd. at 14129-30 (discussing dynamic of “reverse competition”).

¹⁰ *Id.* at 111, 28 FCC Rcd. at 14217 (Ajit Pai, dissenting) (“[W]e cannot necessarily count on market competition to keep prices for inmate calling services just and reasonable.”).

¹¹ *Global Tel*Link*, 866 F.3d at 401.

The second well-established fact is that telecommunications services in correctional facilities represent a critical method for maintaining family and societal connections, and low rates are a matter of public safety and community welfare.¹² Maintaining family bonds and community relationships allow people to partially mitigate the isolation of incarceration and prepare for reentry. As a matter of telecommunications policy, services that provide tangible societal benefits should be promoted and provided on fair and reasonable terms.¹³

Both the California Constitution and the Public Utilities Act grant the Commission broad powers to regulate utilities like ICS carriers.¹⁴ The Commission has “comprehensive jurisdiction to regulate the operation and safety of public utilities”¹⁵ and its powers include the ability “do all things, whether specifically designated in [the Public Utilities Act] or in addition thereto, which are necessary and convenient in the exercise of its jurisdiction.”¹⁶

As discussed in more detail below, PPI encourages the Commission to protect incarcerated consumers and their families by capping intrastate calling rates and addressing the mechanics of ancillary fees.

B. The Commission Should Regulate ICS Rates Through Rate Caps on Phone and Video Calling

The simplest way for the Commission to ensure reasonable calling rates and protect consumers is to impose rate caps based on carriers’ actual and reasonable costs. This is the same approach taken by the FCC with respect to interstate calls,¹⁷ and the Commission has the opportunity to level the playing field by creating a comparable system of rate regulation for intrastate calls.

¹² Remand R&O ¶ 5 (“Studies have long shown that incarcerated individuals who have regular contact with family members are more likely to succeed after release and have lower recidivism rates.”).

¹³ See First Report & Order ¶¶ 42-44, 28 FCC Rcd. at 14130-31.

¹⁴ *San Diego Gas & Elec. Co. v. Superior Ct. of Orange Co.*, 13 Cal. 4th 893, 914-915 (1996).

¹⁵ *Hartwell Corp. v. Superior Ct. of Ventura Co.*, 27 Cal. 4th 256, 265 (2002).

¹⁶ *San Diego Gas & Elec.*, 13 Cal. 4th at 915 (quoting Cal. Pub. Util. Code § 701 (internal quotation marks and emphasis omitted, alteration by court)).

¹⁷ First Report & Order ¶ 47, 28 FCC Rcd. at 14132.

1. A Survey of ICS Rates in California Shows That Intrastate Calls Are Still Unreasonably Costly

In 2018, the Prison Policy Initiative assembled a dataset of intrastate calling rates at prisons and jails throughout the country,¹⁸ including several dozen correctional systems in California.¹⁹ After the issuance of the OIR, our staff collected current rates for the same locations plus a few additional facilities. The 2018 and 2020 rates are shown in Exhibit 1 of the Declaration of Andrea L. Fenster, attached hereto. A comparison of 2018 and current data indicates that rates have generally remained steady during this period: seven out of ten county-run systems have not lowered prices despite a nationwide downward trend in calling rates from state prison systems.²⁰

Change in Calling Rates (2018 to 2020)²¹

<i>Type of Change</i>	<i>Number</i>	<i>Percent</i>
Systems Decreasing Rates	16	25%
Systems Increasing Rates	2	3%
Systems with No Change	45	71%

In twenty-four California correctional systems, a 15-minute intrastate prepaid call currently costs \$5 or more. Under current federal rates caps, a prepaid interstate call of the same duration would cost no more than \$3.15. Indeed, in the six highest-cost systems,²² a 15-minute intrastate call costs over 400% of a comparable interstate call. Overall, the average current cost of an intrastate call from a California correctional facility (\$4.77) is 50% higher than for an interstate call.

¹⁸ Peter Wagner & Alexi Jones, *State of Phone Justice: Local Jails, State Prisons and Private Phone Providers* (Feb. 2019). Detailed rate data can be found in [appendix 2](#) to this report.

¹⁹ Our data focus on calling rates that are determined by contracts between counties and ICS carriers. In some situations, one contract may cover multiple facilities; and some counties may have different contracts covering adult jails and juvenile facilities. Accordingly, when discussing the data presented in Exhibit 1 of the Fenster Declaration, we refer to each line in the table as representing a “correctional system.” Depending on the nature of the contract, the correctional system may be one facility or multiple facilities operated by the same county.

²⁰ See Wagner & Jones, *supra note 18*, at https://www.prisonpolicy.org/phones/state_of_phone_justice.html#overtime.

²¹ See Fenster Decl., Exh. 1.

²² These systems are the adult jails in Inyo, Mono, Napa, and Ventura Counties, as well as the juvenile facility in San Benito County and the probation system in Trinity County.

The disparity between inter- and intrastate rates is an artificial creation of a system of regulatory jurisdiction that was created in 1934 and has not kept pace with technological change.²³ This differential no longer makes sense given the lack of operational difference between inter- and intrastate calling.²⁴ Certainly, PPI is aware of no cost-based justification for in-state calls costing more than interstate calls that—theoretically—travel longer distances.

2. The Commission Should Impose Rate Caps on Voice Calls

Given the available data concerning ICS rates in California prisons, jails, and juvenile facilities, PPI supports rate caps for intrastate voice calling. Based on the record compiled by the FCC, the current interstate rates caps are likely in need of downward adjustment.²⁵ Indeed, the FCC's one-time mandatory data collection regarding carrier revenue and costs indicates that the industry as a whole enjoys a profit margin upward of 40% on ICS products,²⁶ a fact that surely weighs in favor of lowering current rate caps. PPI supports any effort by the Commission to impose intrastate rate caps equal to or lower than the interstate caps imposed under federal law.

3. The Commission Should Impose Rate Caps on Video Calls

Video calling is quickly becoming a common telecommunications offering in correctional facilities. Video service in any given facility is typically offered by the same ICS carrier that holds the monopoly contract to provide phone service to the facility. Specifically, multiple communications services are usually provided by the same carrier under the terms of a single bundled contract.

Our review of video calling in California jails, prisons, and juvenile facilities suggests that 82% of facilities that offer video do so through the same company that provides voice

²³ See Philip J. Weiser, *Federal Common Law, Cooperative Federalism, and the Enforcement of the Telecom Act*, 76 N.Y.U. L. Rev. 1692, 1733-1746 (2001).

²⁴ See Raheer, *supra* note 1 at 50, n.230.

²⁵ See Remand R&O ¶¶ 30-67 (proposing to lower the current per-minute caps of 21¢ (for prepaid calls) to 14¢).

²⁶ *Id.*, appx. A, tbl. 6.

calling service.²⁷ Publicly available procurement documents for ICS contracts indicate that voice and video calling commonly utilize the same network infrastructure, suggesting that carrier costs for the two services should be fairly close together.²⁸ Yet publicly available evidence reflects video calling rates that are substantially higher than voice calling rates.²⁹

Phone/Video Bundling³⁰

<i>Contract Structure</i>	<i>Number</i>	<i>Percent</i>
Bundled contract for both services	27	82%
Competing providers for each service	6	18%

At least some of the difference between voice and video rates is likely the result of regulatory arbitrage.³¹ Specifically, to the extent that FCC rate caps deprive ICS carriers of their previous ability to derive economic rents from customers, carriers can now extract rents by inflating rates for video calling. In fact, combining regulated and unregulated ICS services in one bundled contract allows carriers to use an unusual type of cross-subsidy to preserve the same unreasonable profits that were targeted by the FCC’s 2015 order.³² Because the FCC’s data-collection regime for video calling was stymied by the Court of Appeals,³³ the public record regarding video-calling costs and rates is not as robust as the record for voice calls. PPI believes that rate caps for video-calling are of paramount importance, and if the Commission concludes

²⁷ Fensler Decl. ¶ 5 and Exh. 2. These California data are consistent with overall trends in the industry. See Bernadette Rabuy & Peter Wagner, [Screening Out Family Time: The For-Profit Video Visitation Industry](#) (Jan. 2015), at 12-13.

²⁸ One potential justification for slightly higher video rates could be the need for different end-user hardware. In addition, video calling likely requires the transmission of more data than voice calling, although the marginal cost of this extra transmission is presumably modest in absolute terms, given the secular trend of declining data-transmission costs.

²⁹ *Id.* at 14, fig. 5.

³⁰ See Fenster Decl., Exh 2.

³¹ In the telecommunications industry, regulatory arbitrage “refers to profit-seeking behavior that seeks to take advantage of cost or revenue disparities that are due solely to regulation.” Patrick DeGraba, “[Bill and Keep at the Central Office As the Efficient Interconnection Regime](#),” FCC Ofc. of Plans & Policy Working Paper No. 33 (Dec. 2000) at 1, n.3.

³² Raheer, *supra* note 1 at 54-56.

³³ *Global Tel*Link*, 866 F.3d at 415.

that it needs additional data to set such caps, it should collect the necessary data using its plenary powers under the Public Utilities Act.

C. The Commission Should Incorporate the FCC’s Rules Regarding Ancillary Fees, With One Clarifying Amendment

Federal law defines five types of allowable ancillary fees.³⁴ The amount of these fees are capped and ICS carriers may not charge any other types of fees.³⁵ Administratively, the easiest action for the Commission would likely be to incorporate the federal system of ancillary fee limitations into state law. If the Commission takes this approach, PPI encourages the closure of one recently discovered loophole concerning the interaction between two types of fees.

The two ancillary fees in question are automated payment fees and third-party transaction fees. Federal law allows carriers to impose an automated payment fee of up to \$3.³⁶ The FCC has stated that the automated payment fee is designed to allow carriers to recoup their costs of collecting payments, including card processing costs.³⁷ Separately, federal rules allow carriers to pass through money-transfer fees when a customer who lacks a bank account makes a payment through a third party like Western Union or MoneyGram.³⁸ PPI has recently discovered that Global Tel*Link is sometimes charging \$3 *plus* a variable extra fee when customers make a prepayment.³⁹ GTL alleges that the amount of their “Transaction and Payment Fee” consists of the automated payment fee plus GTL’s card processing costs, but PPI believes that this practice violates both the letter and spirit of the federal rules.

Unless and until the FCC closes this loophole, the Commission should expressly prohibit this type of “double dipping.” California can do this by incorporating federal limits on ancillary

³⁴ 47 C.F.R. § 64.6000(a).

³⁵ *Id.* § 64.6020.

³⁶ *Id.* § 64.6020(b)(1)

³⁷ *In the Matter of Rates for Interstate Inmate Calling Services*, WC Docket No. 12-375, [Second Report and Order and Third Further Notice of Proposed Rulemaking](#) ¶ 167, 30 FCC Rcd. 12763, 12848 (Nov. 5, 2015).

³⁸ *Id.* ¶ 170, 30 FCC Rcd. 12849.

³⁹ *In re Global Tel*Link Corp.*, Iowa Util. Bd. Dkt. No. TF-2019-0039, [PPI Reply to GTL](#) (Oct. 29, 2020).

fees with the clarification that a carrier’s own payment-card processing fees for web or phone payments may only be recovered from the automated payment fee (capped at \$3) and cannot be passed through as third-party transaction fees.

D. The Commission Should Ensure That Deaf Callers Have Access to a Variety of Calling Technologies

The final question posed by the OIR asks whether the Commission should “act to protect calling services for incarcerated people with communications disabilities by limited charges for inmate calling services calls involving the use of text telephones.”⁴⁰ PPI encourages the Commission to give great weight to comments submitted by deaf and disabled consumers,⁴¹ and to take appropriate action to effectuate the legislative policy of “encouraging expanded access to state-of-the-art technologies for . . . disabled Californians.”⁴²

The types of challenges and barriers faced by deaf ICS users are vividly illustrated in comments submitted to the FCC by the advocacy organization Helping Educate to Advance the Rights of the Deaf (“HEARD”).⁴³ PPI would draw particular attention to HEARD’s persuasive argument that deaf callers have varied telecommunications needs, and true equality demands ready access to both TTYs and video relay service (which is different from “off the shelf” video calling services).

III. Conclusion

When the FCC issued its ICS rules in 2015, incarcerated callers and their families celebrated their new ability to maintain relationships without being forced to pay exorbitant rates for phone calls. The *Global Tel*Link* case has yielded a new landscape, where rates can differ

⁴⁰ OIR at 7.

⁴¹ In this document, we use the term “deaf” to include Deaf people (those who culturally identify as Deaf and use sign language as their primary method of communication) as well as the deaf and hard-of-hearing (those with hearing levels that require auxiliary aids or accommodations).

⁴² Cal. Pub. Util. Code § 709(d).

⁴³ *In the Matter of Rates for Interstate Inmate Calling Services*, WC Dkt. No. 12-375, [Comments of HEARD](#) (Mar. 25, 2013); see also [Supplemental Material filed by HEARD](#) (Mar. 25, 2013) (including documentation regarding problems facing deaf callers in the California Department of Corrections and Rehabilitation, at pp. 27-34).

significantly based on arcane rules regarding the supposed geography of calls. The Commission can and should end this arbitrary rate differential in California by imposing rate and fee caps for intrastate voice and video calling.

Dated: November 9, 2020

Respectfully submitted,

/s/ Peter Wagner

Peter Wagner
Executive Director
Prison Policy Initiative, Inc.
P.O. Box 127
Northampton, MA 01060
(413) 527-0845
pwagner@prisonpolicy.org

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DECLARATION OF ANDREA L. FENSTER

I, Andrea L. Fenster, declare as follows:

1. I am employed as a policy analyst at the Prison Policy Initiative. I am over the age of eighteen, and I make the following declaration based on my own personal knowledge. If called upon to testify concerning the matters expressed herein, I could and would competently do so under oath.

2. Attached to this declaration as **Exhibit 1** is a chart summarizing rates for telephone service in California correctional facilities. This chart contains both rates from 2018 as well as current rates. The 2018 rates are taken from Appendix 2 of the Prison Policy Initiative's 2019 report *State of Phone Justice: Local Jails, State Prisons and Private Phone Providers*. The full report is available at https://www.prisonpolicy.org/phones/state_of_phone_justice.html and Appendix 2 is available at https://www.prisonpolicy.org/phones/appendix_table_2.html.

3. The current rates in Exhibit 1 reflect information that I gathered from the websites of several service providers. Specifically, I used the following sources:

- a. For facilities served by Securus, I used the phone rates published at <https://securustech.online/#/rate-quote>.
- b. For facilities served by GTL, I used the rate calculator that is available to account holders at

<https://www.connectnetwork.com/webapp/jsps/cn/ratesandfees/landing.cn>

(requires user to be logged in). When GTL displayed different types of calling rates for a facility, I used the rates listed for the AdvancePay service. Other rates from GTL were available through <https://www.gettingout.com/?tm-interstitial=true>.

- c. For facilities served by ICSolutions, I used the rates published at <https://icsonline.icsolutions.com/rates>.
- d. For facilities served by Paytel, I used the rates published at <https://www.paytel.com/family-and-friends/account/map-details/?st=ca>.
- e. For facilities served by Legacy Inmate Communication, I used the rates published at <https://www.legacyinmate.com/prepaid/ratequotes/prepaidcalling>.
- f. For facilities served by NCIC, I used rates published at <https://account.ncic.com/addfundsdest> and <https://www.ncic.com/states/california>, supplemented by answers that NCIC employees (including CEO Bill Pope and Director of Marketing Craig Storer) provided in response to my inquiries.

4. Where a phone number was required to calculate the cost of a phone call, I used a phone number in another California area code. For all jails except for the Sacramento County Jail, I used the phone number listed on Governor Gavin Newsom's website, (916) 445-2841, and for the Sacramento County Jail, I used the phone number for Los Angeles Mayor Eric Garcetti, (213) 978-0600.

5. Attached to this declaration as **Exhibit 2** is a chart listing the California prisons and jails that I have been able to identify as offering video calling to incarcerated people. I gathered the information in this table directly from correctional facility websites and from the following service provider websites:

- a. Securus: <https://securustech.online/#/facilities-and-pricing>.

- b. GTL: <https://web.connectnetwork.com/facilities-list/?state=CA> and <https://www.gettingout.com/?tm-interstitial=true>.
- c. ICSolutions: <https://www.icsolutions.com/FriendsFamilyHome/ProductsServices/VideoVisitation.php>.
- d. Legacy: <http://www.legacyinmate.com/prepaid/ratequotes/videovisitation>.

6. The list of facilities in Exhibit 2 is not a comprehensive list of facilities offering video calling. Additionally, not all providers had information available on the rates charged for video calling. Where publicly available on service provider websites, rates for video calling were recorded in Exhibit 2.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: November 9, 2020

/s/ Andrea L. Fenster
Andrea L. Fenster

California Phone Call Rates by County in 2020 and 2018

Jurisdiction	Facility Type	Company	2020			2018			Cost change in a 15-minute call between 2018 and 2020
			Initial Minute Rate	Subsequent Minute Rate	15-Minute Call Cost	Initial Minute Rate	Subsequent Minute Rate	15-Minute Call Cost	
Alameda County	multiple county-run facilities	GTL	\$0.23	\$0.23	\$3.45	\$0.21	\$0.21	\$3.15	\$0.30 increase
Amador County	county jail	Securus	\$0.31	\$0.31	\$4.67	\$3.30	\$0.80	\$14.50	\$9.85 decrease
Butte County	county jail	ICSolutions	\$0.21	\$0.21	\$3.15	\$0.21	\$0.21	\$3.15	no change
Butte County	juvenile facility	ICSolutions	\$0.21	\$0.21	\$3.15	Data not collected			--
Calaveras County	county jail	Securus	\$0.31	\$0.31	\$4.65	\$2.91	\$0.41	\$8.65	\$4.00 decrease
California State	multiple state prisons and similar facilities	GTL	\$0.08	\$0.08	\$1.14	Data not collected			--
Colusa County	county jail	Legacy (2018); NCIC (2020)	*	*	*	\$0.73	\$0.73	\$10.95	At least \$7.20 decrease
Contra Costa County	county jail	GTL	\$0.20	\$0.20	\$3.00	\$0.25	\$0.25	\$3.75	\$0.75 decrease
Del Norte County	county jail	Securus	\$2.88	\$0.38	\$8.20	\$2.88	\$0.38	\$8.20	no change
El Dorado County	county jail	GTL (2018); NCIC (2020)	*	*	*	\$0.40	\$0.40	\$6.00	At least \$2.85 decrease
Fresno County	county jail	Legacy	\$0.18	\$0.18	\$2.70	\$0.20	\$0.20	\$3.00	\$0.30 decrease
Fresno County	juvenile facility	Securus	\$2.55	\$0.30	\$6.75	\$2.55	\$0.30	\$6.75	no change
Glenn County	county jail	GTL	\$0.40	\$0.40	\$6.00	\$0.40	\$0.40	\$6.00	no change
Humboldt County	county jail	GTL (2018); ICSolutions (2020)	\$0.18	\$0.18	\$2.70	\$0.42	\$0.42	\$6.30	\$3.60 decrease
Humboldt County	juvenile facility	ICSolutions	\$0.18	\$0.18	\$2.70	Data not collected			--
Imperial County	county jail	GTL	\$0.21	\$0.21	\$3.15	\$0.21	\$0.21	\$3.15	no change
Inyo County	county jail	Securus	\$3.22	\$0.72	\$13.30	\$3.22	\$0.72	\$13.30	no change
Kern County	multiple county-run facilities	Securus	\$0.31	\$0.31	\$4.65	\$0.31	\$0.31	\$4.65	no change
Kings County	multiple county-run facilities	ICSolutions	\$0.21	\$0.21	\$3.15	\$0.21	\$0.21	\$3.15	no change
Kings County	juvenile facility (Kings Co. Juv. Ctr.)	NCIC	*	*	*	Data not collected			--
Kings County	juvenile facility (Kings Co. Juv. Inst.)	ICSolutions	\$0.21	\$0.21	\$3.15	Data not collected			--
Lake County	county jail	ICSolutions	\$0.21	\$0.21	\$3.15	\$0.21	\$0.21	\$3.15	no change
Lassen County	multiple county-run facilities	Securus (2018); GTL (2020)	\$0.25	\$0.25	\$3.75	\$4.08	\$0.98	\$17.80	\$14.05 decrease
Los Angeles County	county jail	GTL	\$0.25	\$0.25	\$3.75	\$0.25	\$0.25	\$3.75	no change
Madera County	county jail	Securus	\$3.32	\$0.57	\$11.30	\$3.32	\$0.57	\$11.30	no change
Madera County	juvenile facility	NCIC	*	*	*	Data not collected			--
Marin County	county jail	GTL	\$0.21	\$0.21	\$3.15	\$0.40	\$0.40	\$6.00	\$2.85 decrease
Marin County	juvenile facility	NCIC	*	*	*	Data not collected			--
Mariposa County	county jail	Legacy (2018); NCIC (2020)	*	*	*	\$0.22	\$0.22	\$3.30	--
Mendocino County	county jail	Legacy	\$0.45	\$0.45	\$6.75	\$0.45	\$0.45	\$6.75	no change
Mendocino County	juvenile facility	Legacy	\$0.45	\$0.45	\$6.75	Data not collected			--
Merced County	county jail	GTL	\$0.48	\$0.96	\$7.20	\$0.48	\$0.48	\$7.20	no change
Modoc County	county jail	Securus	\$2.80	\$0.30	\$7.00	\$2.80	\$0.30	\$7.00	no change
Mono County	multiple county-run facilities	Securus	\$3.79	\$0.69	\$13.45	\$3.79	\$0.69	\$13.45	no change
Monterey County	county jail	GTL	\$0.21	\$0.21	\$3.15	\$0.21	\$0.21	\$3.15	no change
Monterey County	juvenile facility	GTL	\$0.21	\$0.21	\$3.15	Data not collected			--
Napa County	multiple county-run facilities	Securus	\$3.79	\$0.69	\$13.45	\$3.79	\$0.69	\$13.45	no change
Nevada County	juvenile facility	GTL	\$0.25	\$0.25	\$3.75	Data not collected			--
Nevada County	county jail	GTL	\$0.25	\$0.25	\$3.75	\$0.25	\$0.25	\$3.75	no change
Orange County	county jail	GTL	\$0.23	\$0.23	\$3.45	\$0.23	\$0.23	\$3.45	no change
Placer County	multiple county-run facilities	ICSolutions	\$0.37	\$0.37	\$5.55	\$0.37	\$0.37	\$5.55	no change
Placer County	juvenile facility	ICSolutions	\$0.37	\$0.37	\$5.55	\$0.37	\$0.37	\$5.55	no change
Plumas County	county jail	NCIC	*	*	*	Data not collected			--
Riverside County	multiple county-run facilities	Securus	\$0.13	\$0.13	\$1.95	\$0.14	\$0.14	\$2.04	\$0.09 decrease
Riverside County	probation office	NCIC	*	*	*	Data not collected			--
Sacramento County	county jail (Rio Cosumnes Corr. Ctr.)	ICSolutions	\$0.21	\$0.21	\$3.15	\$0.21	\$0.21	\$3.15	no change
Sacramento County	multiple county-run facilities	ICSolutions	\$0.21	\$0.21	\$3.15	Data not collected			--
San Benito County	county jail	GTL	\$0.30	\$0.30	\$4.50	\$0.30	\$0.30	\$4.50	no change

San Benito County	juvenile facility	Securus	\$0.91	\$0.91	\$13.65	\$4.84	\$0.89	\$17.32	\$3.67 decrease
San Bernardino County	multiple county-run facilities	Securus	\$0.20	\$0.20	\$3.00	\$0.20	\$0.20	\$3.00	no change
San Bernardino County	juvenile facility	NCIC	\$0.00	\$0.00	\$0.00	Data not collected			--
San Diego County	multiple county-run facilities	Securus	\$0.33	\$0.33	\$4.95	\$0.32	\$0.32	\$4.80	\$0.15 increase
San Francisco County	county jail	GTL	\$0.00	\$0.00	\$0.00	Data not collected			--
San Joaquin County	juvenile facility	GTL	\$0.21	\$0.21	\$3.15	\$0.21	\$0.21	\$3.15	no change
San Joaquin County	multiple county-run facilities	Securus	\$0.21	\$0.21	\$3.15	\$0.24	\$0.24	\$3.53	\$0.38 decrease
San Luis Obispo County	county jail	GTL (2018); NCIC (2020)	\$0.19	\$0.19	\$2.85	\$0.30	\$0.30	\$4.50	\$1.65 decrease
San Luis Obispo County	juvenile facility	NCIC	\$0.19	\$0.19	\$2.85	Data not collected			--
San Mateo County	juvenile facility	Securus	\$2.50	\$0.25	\$6.00	\$2.50	\$0.25	\$6.00	no change
San Mateo County	multiple county-run facilities	ICSolutions	\$0.05	\$0.05	\$0.68	\$0.05	\$0.05	\$0.68	no change
Santa Barbara County	county jail	ICSolutions (2018); GTL (2020)	\$0.16	\$0.16	\$2.40	\$0.16	\$0.16	\$2.40	no change
Santa Clara County	county jail	GTL	\$0.10	\$0.10	\$1.50	\$0.10	\$0.10	\$1.50	no change
Santa Cruz County	multiple county-run facilities	ICSolutions	\$0.16	\$0.16	\$2.40	\$0.16	\$0.16	\$2.40	no change
Santa Cruz County	juvenile facility	Securus	\$2.75	\$0.25	\$6.25	\$2.75	\$0.25	\$6.25	no change
Shasta County	county jail	GTL	\$0.36	\$0.36	\$5.40	\$0.36	\$0.36	\$5.40	no change
Shasta County	juvenile facility	NCIC	*	*	*	Data not collected			--
Siskiyou County	county jail	Paytel	\$0.21	\$0.21	\$3.15	n/a	n/a	\$7.50	\$4.35 decrease
Siskiyou County	juvenile facility	Paytel	\$0.21	\$0.21	\$3.15	n/a	n/a	\$7.50	\$4.35 decrease
Solano County	county jail	GTL	\$0.16	\$0.16	\$2.40	\$0.16	\$0.16	\$2.40	no change
Sonoma County	juvenile facility	GTL	\$0.25	\$0.25	\$3.75	\$0.25	\$0.25	\$3.75	no change
Sonoma County	county jail	Legacy	\$0.21	\$0.21	\$3.15	\$0.21	\$0.21	\$3.15	no change
Stanislaus County	multiple county-run facilities	ICSolutions	\$0.21	\$0.21	\$3.15	\$0.21	\$0.21	\$3.15	no change
Sutter County	county jail	Securus	\$3.30	\$0.29	\$7.40	\$3.30	\$0.29	\$7.40	no change
Tehama County	county jail	GTL	\$0.35	\$0.35	\$5.25	\$0.50	\$0.50	\$7.50	\$2.25 decrease
Tehama County	juvenile facility	NCIC	*	*	*	Data not collected			--
Tri-County Juvenile Facility	juvenile facility	NCIC	*	*	*	Data not collected			--
Trinity County	probation office	Securus	\$3.79	\$0.69	\$13.45	\$3.79	\$0.69	\$13.45	no change
Trinity County	county jail	Securus	\$3.05	\$0.30	\$7.25	\$3.05	\$0.30	\$7.25	no change
Tulare County	county jail	GTL	\$0.40	\$0.40	\$6.00	\$0.40	\$0.40	\$6.00	no change
Tuolumne County	county jail	Legacy	\$0.22	\$0.22	\$3.30	\$0.22	\$0.22	\$3.30	no change
Ventura County	multiple county-run facilities	Securus	\$0.21	\$0.21	\$3.15	\$0.21	\$0.21	\$3.15	no change
Ventura County	juvenile probation	GTL	Data unavailable			\$0.31	\$0.31	\$4.65	--
Ventura County	county jail	Legacy	\$0.99	\$0.99	\$14.85	\$0.99	\$0.99	\$14.85	no change
Yolo County	county jail	Legacy	\$0.21	\$0.21	\$3.15	\$0.21	\$0.21	\$3.15	no change
Yolo County	juvenile facility	NCIC	\$0.25	\$0.25	\$3.75	Data not collected			--
Yolo County	county jail	NCIC	*	*	*	Data not collected			--
Yuba County	county jail	GTL	\$0.40	\$0.40	\$6.00	\$0.40	\$0.40	\$6.00	no change
Federal	U.S. Marshals Service	ICSolutions	\$0.14	\$0.14	\$2.10	\$0.20	\$0.20	\$3.00	\$0.90 decrease
Federal	immigration detention and processing centers	GTL	Data unavailable			Data not collected			--
Federal	Bureau of Prisons, Low Security	ICSolutions	Data unavailable			\$0.08	\$0.08	\$1.20	--
Federal	Bureau of Prisons and Naval Brigs	GTL	\$0.21	\$0.21	\$3.15	Data not collected			--

Per minute rate information for in-state calls from correctional facilities in California. 2020 data was collected by the Prison Policy Initiative in November 2020 from the rate calculators made available on service provider websites. Data for 2018 was published in Appendix 2 (https://www.prisonpolicy.org/phones/appendix_table_2.html) to *State of Phone Justice: Local Jails, State Prisons and Private Phone Providers*. *NCIC does not make a rate calculator available, but the company tells us that all of their rates in California are \$0.25/minute or less. Calls from people detained by police departments and similar agencies served by GTL, Securus, Legacy, NCIC and other unknown vendors were not included in this table, but some of these rates can be particularly exorbitant. For example, until earlier this year when NCIC took over the contract and lowered the rates, calls from the City of Corona Police Department were \$1.25 per minute. While our survey successfully located the rates for all county jails in California, there may be particularly exorbitant rates charged in police departments by companies not included in our survey.

Video Calling Bundling in California by County

Jurisdiction	Facility Type	Phone Service Provider	Video Service Provider	Are the phone and video vendors the same?	Detailed Rates for Video Calling (where disclosed by the provider)
Alameda County	multiple county-run facilities	GTL	GTL	Yes	
Butte County	county jail	ICSolutions	Securus	No	\$0/20 minutes
Calaveras County	county jail	Securus	Securus	Yes	Remote Attorney: \$6.99/20 minutes or \$11.98/40 minutes Onsite Attorney: \$0/30 minutes Remote Friends & Family: \$6.99/20 minutes or \$11.98/40 minutes Onsite Friends & Family: \$0/30 minutes
California State	multiple state prisons	GTL	GTL at Mule Creek and Solano	Yes	
El Dorado County	county jail	GTL	NCIC	No	\$10.50 per 30 minute visit
Fresno County	county jail	Legacy	Legacy	Yes	At Facility: \$0.00/minute; 30 minutes maximum Remote: \$0.35/minute; 30 minutes maximum
Glenn County	county jail	GTL	GTL	Yes	
Imperial County	county jail	GTL	GTL	Yes	
Inyo County	county jail	Securus	Securus at Laredo Justice Facility	Yes	Onsite Attorney: \$0/30 minutes Remote Friends & Family: \$12.98/20 minutes or \$25.98/40 minutes Onsite Friends & Family: \$0/30 minutes
Kings County	multiple county-run facilities	ICSolutions	ICSolutions	Yes	
Lake County	county jail	ICSolutions	ICSolutions at Sheriff's Office	Yes	
Lassen County	multiple county-run facilities	Securus	GTL	No	
Los Angeles County	county jail	GTL	GTL	Yes	
Marin County	county jail	GTL	GTL	Yes	
Mariposa County	county jail	Legacy	Legacy	Yes	At Facility: \$0.00/minute; 30 minutes maximum Remote: \$0.50/minute; 0 minutes maximum
Mendocino County	county jail	Legacy	Legacy	Yes	At Facility: \$0.10/minute; 25 minutes maximum Remote: \$0.35/minute; 35 minutes maximum
Monterey County	county jail	GTL	GTL	Yes	
Monterey County	juvenile facility	GTL	GTL	Yes	
Napa County	multiple county-run facilities	Securus	Securus at North Jails 1, 2, & 3	Yes	Jail 1: Onsite Attorney: \$0/30 minutes Remote Friends & Family: \$12.98/20 minutes or \$25.98/40 minutes Onsite Friends & Family: \$0/30 minutes Jails 2 & 3: Remote Attorney: \$7.95/30 minutes or \$15.00/60 minutes Onsite Attorney: \$0/30 minutes Remote Friends & Family: \$7.95/30 minutes or \$15.00/60 minutes Onsite Friends & Family: \$0/30 minutes
Nevada County	county jail	GTL	GTL	Yes	
Placer County	multiple county-run facilities	ICSolutions	ICSolutions at Sheriff's Office	Yes	
Plumas County	county jail	NCIC	NCIC	Yes	
San Benito County	county jail	GTL	GTL	Yes	
San Diego County	multiple county-run facilities	Securus	Securus at Central Jail, Facility 8, Las Colinas, East Mesa, George Bailey, Vista	Yes	Remote Attorney: \$5.00/30 minutes (if offered) Onsite Attorney: \$0/30 minutes Remote Friends & Family: \$5.00/30 minutes Onsite Friends & Family: \$0/30 minutes
San Luis Obispo County	county jail	GTL	GTL	Yes	
San Mateo County	multiple county-run facilities	ICSolutions	GTL	No	
Shasta County	county jail	GTL	GTL	Yes	
Stanislaus County	multiple county-run facilities	ICSolutions	GTL	No	
Sutter County	county jail	Securus	GTL, Securus	Yes and No	Securus: \$0/40 minutes
Tehama County	county jail	GTL	ICSolutions	No	
Tuolumne County	county jail	Legacy	Legacy	Yes	At Facility: \$0.10/minute; 25 minutes maximum Remote: \$0.35/minute; 35 minutes maximum
Ventura County	county jail	Legacy	Legacy	Yes	At Facility: \$0.00/minute; 30 minutes maximum; \$5.00 fee Remote: \$0.50/minute; 30 minutes maximum; \$1.00 fee

Ventura County	multiple county-run facilities	Securus	Securus at Pretrial Detention Center and Todd Road	Yes	Onsite Attorney: \$0/60 minutes Remote Friends & Family: \$6.00/30 minutes Onsite Friends & Family: \$0/60 minutes
Federal	immigration detention and processing centers	GTL	GTL	Yes	

Service provider and rate information for video calls from correctional facilities in California. Data was collected by the Prison Policy Initiative in November 2020 using rate calculators made available on service provider websites and correctional facility websites. This is not an exclusive list; other counties and facilities may provide video calling services which are not listed here. Only counties which were listed on a providers websites or which listed video calling on their own website are included in this list.