

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



In the Matter of the Joint Application of  
Platinum Equity Capital Partners IV, L.P. and  
SCRS Intermediate Holding Corporation,  
Requesting Expedited Approval of Indirect  
Transfer of Control of Securus Technologies,  
LLC (U-6888-C) Pursuant to California  
Public Utilities Code Section 854(a).

Application 25-05-016  
(Filed May 23, 2025)

**FILED**  
05/21/26  
04:59 PM  
A2505016

**OPENING COMMENTS OF  
THE UTILITY REFORM NETWORK ON THE DECISION APPROVING INDIRECT  
TRANSFER OF CONTROL OF SECURUS TECHNOLOGIES, LLC TO SCRS  
INTERMEDIATE HOLDING CORPORATION SUBJECT TO CONDITION**

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May 21, 2026

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## I. INTRODUCTION

Pursuant to Rule 14.3 of the Commission’s Rules of Practice and Procedure (“Rules”),<sup>1</sup> The Utility Reform Network (“TURN”) submits these opening comments on the *Proposed Decision Approving Indirect Transfer of Control of Securus Technologies, LLC to SCRS Intermediate Holding Corporation Subject to Condition* (“Proposed Decision” or “PD”).<sup>2</sup> TURN generally supports the Commission’s affirmation of its broad jurisdiction over the proposed transaction and its determination that conditions are necessary for approval. TURN respectfully recommends modifications and additions to certain Ordering Paragraphs (“OPs” or “Conditions”) to further clarify and enhance the Commission’s positions in the PD. TURN recommends that the Commission modify the PD as follows:

- Include a finding that the Applicants have not met the burden of proof or, in the alternative, findings demonstrating, with specificity, how the Applicants have met their burden of proof beyond their bare assertions;
- Modifications to the proposed Reporting Condition:
  - To clarify that terms and conditions include prices, terms, and conditions, and contracts between Securus and its end users, *as well as* between Securus and its institutional customers;
  - Extend the reporting period from two to at least five years; and
  - Require material changes to be submitted as a Tier 2 or 3 advice letter.

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<sup>1</sup> Unless otherwise specified, references to “Rule(s)” refer to the Commission’s Rules of Practice and Procedure.

<sup>2</sup> See *Decision Approving Indirect Transfer of Control of Securus Technologies, LLC to SCRS Intermediate Holding Corporation Subject to Condition* (issued on May 1, 2026) (“PD”). Note that all Commission documents and party filings referenced to in these comments refer to those issued or filed in A.25-05-016, unless otherwise specified.

- Add a requirement that Securus submit, within 60 days of the effective date of the approval of the proposed transaction and semi-annually thereafter, service quality reports for five (5) years following the approval of the proposed transaction, consistent with the recommendations made in TURN’s opening and reply briefs. Alternatively, TURN recommends that the Reporting Condition include any material changes to service-quality provisions in contracts between Securus and its institutional customers. Additionally, to the extent that any of these contracts include provisions related to service quality *reporting*, such as outage information, this information should be submitted to the Commission as well;
- Strike Finding of Fact 8, regarding management and operations expectations.
- Add a requirement that the Applicants submit any changes or modifications to their privacy-related terms and conditions as a Tier 2 advice letter identifying the changes to the terms and conditions, or, in the alternative, clarify that changes to “terms and conditions” include Serucus’ privacy policies.

For convenience, TURN attaches a redline of the Proposed Decision to reflect all of TURN’s recommendations for modifications (*see* Appendix A).

## **II. LEGAL STANDARD**

Under Rule 14.3(c), comments on a proposed decision “shall focus on factual, legal or technical errors in the proposed . . . decision and in citing such errors shall make specific references to the record or applicable law,” and comments that fail to do so “will be accorded no weight.” Moreover, comments “proposing specific changes to the proposed . . . decision shall include supporting findings of fact and conclusions of law.”

**A. The Proposed Decision Requires Additional Findings Related to the Standard of Review to be Applied to the Transaction.**

**1. The Proposed Decision Correctly Affirms the Commission’s Broad Jurisdictional Authority.**

The PD correctly affirms that “[t]he Commission has broad discretion under Pub Util. Code Section 854 to approve or reject a proposed transaction” and that “[i]f necessary and appropriate, the Commission may attach conditions of approval to a transaction to protect and promote the public interest.”<sup>3</sup> As TURN noted in its opening and reply briefs, the Commission possesses multiple sources of jurisdictional authority over this transaction, *including, but not limited to*, Section 854(a) jurisdiction.<sup>4</sup> Moreover, TURN detailed that, contrary to the Applicants’ extraordinarily narrow view of the Commission’s authority, Section 854(a) authorizes the Commission to undertake a review of a broad array of issues and impose conditions to ensure that the proposed transaction is in the public interest.<sup>5</sup> The Commission has exercised its broad authority to devise conditions under Section 854(a), to prevent the “pass through” of transaction-related costs onto ratepayers and “to establish safeguards we deem necessary or to obtain information required for ongoing monitoring.”<sup>6</sup> For this reason, TURN supports the Commission’s discussion of its authority under Section 854(a), and the PD properly rejects the Applicants’ narrow interpretation to the contrary.

**2. The Proposed Decision Shifts the Burden of Proof from the Applicants to the Intervenors.**

The PD’s discussion of TURN’s concerns appears to shift the burden of proof from the Applicants to the Intervenors. As TURN noted in opening and reply briefs, the Applicants have

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<sup>3</sup> See PD at 12.

<sup>4</sup> See TURN Reply Brief at 5-10 (broad authority), 10-12 (authority to impose conditions).

<sup>5</sup> See TURN Opening Brief at 11-13 (filed Jan. 27, 2026).

<sup>6</sup> D.07-05-061 at 32-33 (issued in A.06-09-016 on May 30, 2007).

“the burden of proof to establish that the Commission should approve” a transfer application.<sup>7</sup> However, in discussing whether the proposed transaction is in the public interest, several of TURN’s arguments regarding possible harms *arising from the lack of evidence* proffered by the Applicants are found not to be supported by the record.<sup>8</sup> TURN observes that this discussion is incomplete as to how the record demonstrates that the *Applicants* have countered TURN’s contentions. For example, TURN can only discern that the PD relied on the bare, initial claims made by the Applicants that “the change in ownership will be ‘seamless’ and is not expected to change Securus’s current prices, terms and conditions of service, or customer contracts.”<sup>9</sup> TURN’s opening brief identified its concerns regarding the transaction, including the incentives created by its approval and the unsupported benefits claimed by the Applicants.<sup>10</sup> In this way, rather than demonstrating that the record supports the Applicants’ allegation that the transfer aligns with the expectations they allege, the PD concludes that *TURN* has not met that burden. For this reason, TURN recommends adding a finding of fact to reflect that the Applicants have not met their burden. If the Commission found Applicants’ recommendations persuasive, TURN contends that a discussion of specific record evidence offered by the Applicants, along with an analysis of whether the Commission finds this persuasive, would be necessary.

**B. The Proposed Decision Properly Imposes a Condition to Ensure that the Transaction is in the Public Interest.**

TURN fully supports the proposed requirement that the Applicants report changes to their terms and conditions (“Reporting Condition”); however, that requirement alone is insufficient to ensure the proposed transaction is in the public interest. The PD notes the Applicants’ claim that

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<sup>7</sup> D.16-01-047 at 5 (issued in A.13-09-023 on Jan. 29, 2016) (noting the burden of proof as applying to applicants in an Section 854(a) review).

<sup>8</sup> See PD at 14-16.

<sup>9</sup> *Id.* at 15.

<sup>10</sup> See TURN Opening Brief at 21 (filed Jan. 27, 2026).

the proposed transaction will permit them “to operate and contribute to California’s telecommunications marketplace and that the transaction will not impact Securus’s ability to meet its public utility obligations” must be reconciled that the “record on this point is based largely on Securus’s expectation that Securus’s current prices, terms and conditions of service, or customer contracts will remain unchanged due to the proposed transaction.”<sup>11</sup> The PD proposes a condition requiring post-transaction Securus to report changes to its terms and conditions of service for two years following the transfer.<sup>12</sup> While TURN agrees that the record supports the need for this requirement, it alone is not sufficient. TURN respectfully offers additional recommendations to strengthen the Reporting Condition below.

**1. The Reporting Period for the Reporting Condition Should be Extended to Five or More Years.**

The PD proposes requiring Securus to report changes to terms and service for a period of two years.<sup>13</sup> However, the PD does not cite any record evidence supporting a two-year limitation on the Reporting Condition. The Commission has previously adopted conditions that extend for five or more years<sup>14</sup> and has specifically required tracking and reporting for more than two years in Section 854 application approvals.<sup>15</sup> Moreover, the PD acknowledges TURN’s concerns, and TURN’s recommended modification would align with TURN’s principal concern: the uncertainty and incentives created by the proposed transaction on how Securus users might be

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<sup>11</sup> PD at 15.

<sup>12</sup> *See id.* at 35 (OP 2).

<sup>13</sup> *See id.*

<sup>14</sup> *See, e.g.*, D.26-01-023 at 117-19, 122-23 (OP 4, 7, 8, 9, 10, 19, 20, 23) (conditions for a period of five years), 115 (OP 2) (infrastructure build conditions within seven years), 124-125 (OP 30, 31) (period of ten years), 123 (OP 22) (Lifeline condition for a period of 16 years) (issued in A.24-10-006 on Jan. 20, 2026).

<sup>15</sup> *See, e.g.*, D.26-01-023 at 117 (OP 4) (five year reporting condition); D.21-04-008 at OP 4(m) (issued in A.20-05-010 on Apr. 20, 2021) (approximately four years).

impacted in the medium and long term.<sup>16</sup> Therefore, TURN recommends that the Commission adopt a reporting requirement of at least five years.

**2. The Reporting Condition Should Require Securus to Submit a Tier 2 or 3 Advice Letter.**

The PD proposes to require Securus to submit a Tier 1 advice letter for changes to its terms and conditions.<sup>17</sup> While TURN respectfully maintains that more formal reporting requirements are necessary—as recommended in TURN’s opening and reply briefs—TURN alternatively believes that the proposed process may provide some transparency into the Applicants’ otherwise bare promises that nothing will effectively change in the absence of the reporting conditions recommended by TURN. However, the “informational” nature of the Tier 1 advice letter would not hold the Applicants accountable for material changes to their terms and conditions (particularly sweeping changes soon after securing approval for the proposed transaction).

Under Industry Rule 7.1 of General Order (“G.O.”) 96-B, matters appropriate for a Tier 1 Advice letter include “[a]n editorial change to the text of a tariff that *does not affect a rate, charge, term, or condition under the tariff.*” The advice letter becomes effective pending the Commission’s disposition. By contrast, a Tier 2 advice letter, which becomes effective after staff approval, and a Tier 3 advice letter, which becomes effective after Commission approval, include changes to price or contracts, as well as interconnection agreements and new services.<sup>18</sup> The PD approves the transaction contingent, in part, on the Applicants’ assertion that prices, rates, terms and conditions, and contracts will not change. Should Securus submit changes to matters such as pricing or other material revisions to contract terms, these changes would be more appropriately

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<sup>16</sup> See TURN Opening Brief at 15 (Jan. 27, 2026).

<sup>17</sup> PD at 26.

<sup>18</sup> Industry Rule 7.2(2)(6) & 7.3(3).

reported under Tier 2 or Tier 3 advice letters. This is especially true because the PD approves the proposed transactions *based on* the Applicants’ assertions that prices, terms, and conditions, and the contract will not change in association with the proposed transaction. Indeed, for example, should the Applicants propose an overhaul of their rate and price structure mere days or weeks after approval of the proposed transaction, the Commission should have the ability to seek additional information and to require Securus to notify its end users *prior* to such changes.

TURN acknowledges the potential administrative burden on Commission staff to review any and all *non-material* changes to the terms and conditions, particularly when the Applicants may report a series of changes that do not otherwise modify the prices or rates charged or the rights of Securus end users. For purposes of this condition, TURN recommends that the material changes be defined as any and all changes to the price or rate of services, changes that would alter service quality-related terms or reporting metrics (such as outage or dropped call rates or complaints) in agreements with Securus’ institutional customers, and changes that impact the privacy rights of Securus’ end users. Non-material changes would include minor or typographical changes that do not otherwise result in substantive changes to the three categories identified above.<sup>19</sup>

### **3. The Reporting Condition Requires Further Modifications and Clarification.**

The reporting condition would require Securus to submit clean copies of the previous and new terms and conditions, along with a redline showing the changes.<sup>20</sup> TURN observes that the PD requires Securus to report “changes to its terms and conditions of service”<sup>21</sup> and “any

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<sup>19</sup> See Appendix A at 1 (Conclusions of Law) for TURN’s specific recommendation.

<sup>20</sup> PD at 26.

<sup>21</sup> PD at 15.

changes to its terms and conditions.”<sup>22</sup> However, the PD requires the reporting condition on the Applicants’ contention that “current prices, terms and conditions of service, or customer contracts” will not change.<sup>23</sup> Under the proposed requirement, “terms and conditions” may be interpreted as including only those contract terms between Securus and its end users, as opposed to contract terms between Securus and institutional customers and, thus, would require Securus to report only changes to its agreements with Securus end users, to the exclusion of changes to *contract terms with institutional customers* (which in turn may include information related to policies affecting pricing, rates, service quality, and privacy). TURN recommends that the Commission clarify that terms and conditions include current prices, terms and conditions of service, and both end-user *and* institutional contracts.

**C. The PD Errs by Admitting Evidence into the Record via the Applicants’ Notice and Adopting Substantive Conclusions Arising From It.**

On April 23, 2026, the Applicants filed a “Notice to Update the Record” (“Notice”).<sup>24</sup> In the Notice, the Applicants state that Aventiv’s current CEO, Mr. Abel, has resigned and that the current president, Mr. Elder, will assume the *interim* CEO role.<sup>25</sup> The Applicants claimed that “this personnel update should have no bearing on the Commission’s consideration or approval of the Application.”<sup>26</sup> While the PD is correct that Mr. Elder was part of the original application,<sup>27</sup> the admission of the Applicants’ Notice raises two concerns. First, Rule 13.15 requires that a “proceeding shall stand submitted for decision by the Commission after the taking of evidence, the filing of briefs, and the presentation of oral argument as may have been prescribed.”

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<sup>22</sup> *Id.* at 24, 25, 26.

<sup>23</sup> *Id.* at 15.

<sup>24</sup> *See* Applicants’ Notice to Update the Record at 1-2 (filed Apr. 23, 2026).

<sup>25</sup> *See id.* at 1.

<sup>26</sup> *See id.* at 2.

<sup>27</sup> *See* PD at 10-11.

Additionally, it requires “[a] motion to set aside the submission for the taking of additional evidence or argument . . . including material changes of fact or of law alleged to have occurred since the conclusion of the hearing” and “[i]t” shall contain a brief statement of the proposed additional evidence, and explain why such evidence was not previously adduced.” TURN does not understand the Applicants as having filed a motion consistent with Rule 13.15, which appears evident because the Applicants themselves assert that the change has no bearing on the Commission’s consideration or approval of the proposed transaction. Therefore, the Notice did not reopen the record of the proceeding and cannot be included as record evidence. The PD correctly reflects that TURN did not dispute Mr. Elder’s technical qualifications, as Mr. Elder was not the Interim CEO on the date the record was closed on February 10, 2026. If the Commission does not require a Rule 13.15 motion to effectively re-open the record in this instance, TURN asserts that Joint Applicants have not met their burden of proof regarding whether Mr. Elder’s is qualified to serve as Interim CEO and to what extent his new position will impact the public interest, if the proposed transaction is approved. As such, TURN disputes Mr. Elder’s technical qualifications.

Second, the Applicants claim that “this personnel update should have no bearing on the Commission’s consideration or approval of the Application” is inaccurate.<sup>28</sup> The Applicants clearly attempt to clothe an *argument* as clarification by suggesting that Mr. Abel’s replacement by Mr. Elder does not impact the Commission review under Section 854(a) and is not a *material change of fact*. TURN’s Protest noted that the Applicants failed to disclose the management of the new holding company, despite some evidence that the Applicants provided their identities in other state filings.<sup>29</sup> The Commission requested and received a list of executives expected to be

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<sup>28</sup> See Applicants’ Notice to Update the Record at 2.

<sup>29</sup> See TURN Protest at 12-13 (filed June 30, 2025).

voted in by the new board, as well as the initial slate of nominees for it.<sup>30</sup> However, TURN observes that in the Applicants' response to the Commission's request for supplemental information, the Applicants noted that Mr. Abel, *but not Mr. Elder*, was expected to be voted onto the board of the prospective transferee. The Applicants' Notice merely indicates that Mr. Elder is assuming the interim CEO role and does not otherwise provide information on who will replace him or whether he will assume the seat on the new board originally slated for Mr. Abel. Given Mr. Elder's interim status, the Applicants' Notice provides the Commission with *less*, not more, information regarding Securus' post-transaction management. Additionally, while the PD notes that TURN did not raise specific objections to Mr. Elder's qualifications,<sup>31</sup> the Commission's determination of the Applicants' technical qualifications is predicated on the "biographical information" provided for the prospective executives and the board of directors.<sup>32</sup> However, this biographical information is necessarily undermined by Mr. Abel's departure and the vacancy in the CEO position. In other words, TURN observes that the Commission's determination relied on the cumulative or aggregate biographical information proffered by the Applicants, which is now necessarily diminished. In this way, TURN observes that the Applicants may secure approval for the proposed transaction based on their current *interim* CEO, with neither a full assessment of the successor CEO's qualifications nor the identity of the person who would assume a position on the new board.

Based on this development, TURN respectfully requests that the Commission strike FOF 8 because the Commission cannot find that Securus will be managed by the "same officers and key personnel" after the transfer.

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<sup>30</sup> See Applicants' Response to Administrative Law Judge's Ruling to Submit Supplemental Information at 2-3 (filed Aug. 15, 2025).

<sup>31</sup> See PD at 10.

<sup>32</sup> *Id.* at 17-18.

**D. The Proposed Decision Errs Because G.O. 133-E Does Not Sufficiently Address Service Quality Concerns in the Carceral Setting.**

The PD observes that “many of the conditions that TURN proposes overlap with existing Commission reporting requirements[.]”<sup>33</sup> Additionally, the PD dismisses TURN’s service quality concerns because “if any changes to Securus’ terms and conditions occur within two years of the transfer of control, [it] will require Securus to report that to the Commission.” However, the proposed reporting condition alone does not address TURN’s service quality concerns for two key reasons. First, while the Commission recently confirmed that G.O. 133-E service quality requirements apply to IPCS providers,<sup>34</sup> the decision adopting G.O. 133-E, D.25-09-031, did not specifically consider IPCS-related issues. TURN understands that no party comments in that proceeding addressed IPCS-specific concerns because those concerns were scoped in R.20-10-002 and *not* in R.22-03-016. As D.25-09-031 did not consider service quality in the carceral setting, its consumer protections and penalty structure appear to require further clarification if applied to IPCS.<sup>35</sup> Without such clarification, there are effectively little to no existing requirements that would specifically promote service quality in the IPCS context.

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<sup>33</sup> *Id.* at 24. TURN observes that the PD does not disaggregate which issues are out of scope or addressed by other reporting requirements.

<sup>34</sup> See D.26-04-004 at 59, 73 (issued in R.20-10-002 on Apr. 13, 2026).

<sup>35</sup> For example, D.25-09-031 adopts a customer credit as part of the penalty structure “to ensure that those directly impacted by outages receive direct relief.” D.25-09-031 at 119 (issued in R.22-03-016 on Sept. 26, 2025). One aspect of this structure is that it initiates “an automatic customer credit equal to 1/30th of the service’s monthly bill for each day that exceeds the 24-hour repair standard.” *Id.* at 120. TURN generally supports applying this customer credit structure to IPCS users, as it agrees with the Commission’s finding that this penalty structure would ensure that IPCS users impacted by outages receive direct relief. However, the customer credit formulation adopted in D.25-09-031 is based on *monthly* billing rather than on *per-minute* or *debit* billing, which predominates in IPCS. See, e.g., *Incarcerated People’s Communications Services; Implementation of the Martha Wright-Reed Act Rates for Interstate Inmate Calling Services*, WC Docket Nos. 23-62, 12-375, Report & Order, Order On Reconsideration, Clarification & Waiver, and Further Notice Of Proposed Rulemaking at para. 430 (rel. July 22, 2024), <https://docs.fcc.gov/public/attachments/FCC-24-75A1.pdf>. Thus, it is unclear how IPCS providers will assess these credits and issue them to users.

Second, the Reporting Condition would not permit the Commission to detect service quality degradation during the reporting period. As noted above regarding the lack of clarity surrounding “terms and conditions,” it is unclear how reporting changes to the terms of service between Securus users and Securus would capture changes to service quality. Indeed, a review of Securus’ terms and conditions reveals that it does not make “any promise to [its users] that . . . [its] Products will meet [its users] requirements or expectations” or that “access to [its] Products will always be available (or be uninterrupted) or secure (free from unauthorized access)[.]”<sup>36</sup>

Moreover, contracts between Securus and its institutional customers (i.e., any given carceral facility or system) *may* include provisions related to service quality; they, too, are unlikely to include information on *actual performance* under those contracts or on complaints by incarcerated individuals (or their families and friends relying on the service) about call quality or outages. Therefore, significant service quality degradation may occur that would not be captured by the proposed Reporting Conditions. For this reason, TURN recommends that the Commission adopt the service quality reporting conditions outlined in TURN's opening and reply briefs.<sup>37</sup> Alternatively, TURN recommends that the Commission’s terms and conditions include any material changes to service-quality provisions in contracts between Securus and its institutional customers. Additionally, to the extent that any of these contracts include provisions related to service quality *reporting*, such as outage information, this information should be submitted to the Commission under the proposed advice letter process.

#### **E. The Record Supports TURN’s Privacy Concerns.**

The PD does not adopt conditions that address TURN’s privacy concerns.<sup>38</sup> The record

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<sup>36</sup> See Securus General Terms and Conditions (effective Apr. 22, 2026), <https://www.securustechnologies.com/consumer/friends-and-family-terms-and-conditions>.

<sup>37</sup> See TURN Opening Brief, Summary of Recommendations (filed Jan. 27, 2026).

<sup>38</sup> PD at 27.

demonstrates that Securus' current privacy policies, including Securus' stated policy regarding compliance with the California Consumer Privacy Act, are accessible over the internet or via a toll-free number.<sup>39</sup> Given that incarcerated users generally cannot freely access the internet or call toll-free numbers,<sup>40</sup> TURN is concerned that this insufficient notice invites post-transaction changes that could be detrimental to Securus end users, who are unable to readily view Securus' privacy policies or changes to them. Furthermore, even with the proposed Reporting Condition to identify changes to the policy, TURN observes that Securus users would not have access to the Tier 1 advice letter reporting or to the resulting policy if it were available only online or over a toll-free call. For this reason, TURN recommends that the Commission clarify that terms and conditions include Securus' privacy policy and adopt TURN's recommendations, as described in its opening and reply briefs,<sup>41</sup> or, in the alternative, adopt the modification of the advice letter process detailed above. By requiring changes to Securus' privacy policy to be submitted as a Tier 2 or Tier 2 advice letter, the Commission would have the opportunity to intervene to require Securus to notify its users of those changes, among other interventions.

### III. CONCLUSION

For the reasons stated above, the Commission should adopt TURN's recommendations to ensure that the proposed transaction is in the public interest.

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<sup>39</sup> See Intervenor Rebuttal Testimony of Stephen Raher 10:7:11. TURN notes that Aventiv's privacy policy applies to Securus.

<sup>40</sup> See *id.*

<sup>41</sup> See TURN Opening Brief, Summary of Recommendations (filed Jan. 27, 2026). TURN previously recommended that Securus be required to submit, via Tier 2 advice letter, changes to its privacy policy 15 days *after* the changes occur. The PD proposes to require notice of changes 30 days *before* the changes come into effect. TURN supports the timing construct proposed in the PD, and adjust its recommendation to require that changes to Aventiv or Securus' privacy policy should be submitted via a Tier 2 or 3 advice letter 30 days before the changes are proposed to come into effect.

Respectfully submitted,

By: /s/ Leo Fitzpatrick\_\_\_\_\_

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**THE UTILITY REFORM NETWORK**

Dated: May 21, 2026

## APPENDIX A

### Finding of Fact

- X. The **Joint Applicants claim the** proposed transaction is not expected to result in changes to Securus's rates, price lists, terms and conditions of service, or customer contracts.
- ~~X. Securus is expected to continue to be managed and operated by primarily the same officers and key personnel after the transfer.~~
- X. SCRS Intermediate HC supplied biographical information of **its only one of its** prospective board of directors that demonstrates ~~sufficient~~ expertise in telecommunications and related businesses.
- X. The record supports that, with the imposition of the condition that Securus report any changes to its terms and conditions of service within ~~two~~ **five** years of the effective date of the transfer, the transfer is in the public interest.
- X. **The Commission has broad discretion under Pub Util. Code Section 854 to approve or reject a proposed transaction. If necessary and appropriate, the Commission may attach conditions of approval to a transaction to protect and promote the public interest.**

### Conclusions of Law

- X. The application meets the Commission's requirements for approval of a transfer of control and the indirect transfer of control of Securus to SCRS Intermediate HC should be approved subject to the condition that in the event that Securus makes any changes to its terms and conditions of service, **as between Securus users or customers and institutional customers**, within ~~two~~ **five** years of the effective date of this transfer, Securus shall submit a Tier **3 [or 2]** advice letter(s) with the Communications Division in accordance with General Order 96-B reporting any changes to its terms and conditions of service 30 days prior to the effective date of such changes.

### Ordering Paragraphs

- X. In the event that Securus Technologies, LLC's terms and conditions of service **between Securus users or customers and institutional customers materially** change within ~~two~~ **five** years of the effective date of the transfer of control, Securus Technologies, LLC shall submit a Tier ~~1~~ **3 [or 2]** advice letter(s) to the Communications Division in accordance with General Order 96-B. The Tier ~~1~~ **3 [or 2]** advice letter(s) shall report any changes to its terms and conditions of service and shall be submitted 30 days prior to the effective date of such changes. The advice letter(s) shall describe any changes to the terms and conditions and provide 1) a clean copy of the previous terms and conditions, 2) a clean copy of the new terms and conditions, and 3) a redline copy of the changes to the terms

and conditions. **Securus must report changes to its terms and conditions of service for its users or customers, as well as any material changes to its contracts with its institutional customers.**

**Material changes include any changes to:**

**The rates and prices, including, but not limited to: per-minute or per-call charges, device use fees, connection fees, subscription rates, ancillary fees, or surcharges, for Securus users or customers;**

**Applicable metrics required under the Commission’s new General Order (“G.O.”) 133-E, including those related to interconnected Voice over Internet Protocol (“VoIP”) services.**

**Privacy-related terms and conditions that impact the privacy rights of Securus’ users or customers.**

- X. The proceeding is submitted as of ~~April 23, 2026~~ February 10, 2026.
- X. **If Securus demonstrates a six-month decline in service quality based on its reporting, Securus should provide specific, verifiable plans with set goals and metrics to improve service quality as part of its latest report in this recommendation. Moreover, the Commission should reserve the right to investigate if Securus after a demonstrated decline.**