



**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
(Filed October 6, 2020)

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MOTION FOR PARTY STATUS OF TALTON COMMUNICATIONS, INC.

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Dated: June 12, 2026

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THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Consider
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I. Introduction.

Talton Communications, Inc. ("Talton") respectfully moves for party status in this proceeding in accordance with Section 1.4 of the California Public Utilities Commission ("Commission") Rules of Practice and Procedure.

II. Interest in this Proceeding.

Talton is a small telecommunications contractor located in Selma, Alabama. Despite its modest size, Talton holds a federal contract for the installation and maintenance of telephone services at U.S. Immigration and Customs Enforcement ("ICE") facilities and has continuously provided Incarcerated People's Communications Services ("IPCS") at ICE facilities, including facilities in California, since 2009.

Under its ICE Contract, Talton currently provides IPCS to approximately thirty-four federal facilities in California. Talton's ICE Contract requires the provision and operation of a *pro bono* network for IPCS whereby Talton operates a no-cost Legal Access and Consular Connectivity Platform that facilitates secure communications with *pro bono* attorneys, EOIR-approved legal service organizations, foreign consulates, and embassies, significantly enhancing access to legal representation, consular assistance, and due process protections. Talton's ICE

Contract as currently negotiated accounts for the provision of this service; the California rate cap instituted through Rulemaking 20-10-002 do not.

Because of the *pro bono* service Talton provides, the Commission's rate caps place Talton at an inherent competitive disadvantage as against all other IPCS providers—none of whom must provide a similar free service. Accordingly, Talton's operation of this *pro bono* network serves the public interest and Talton is an interested party to Rulemaking 20-10-002 as an IPCS provider who is directly impacted by the rate cap decision in Rulemaking 20-10-002.

Decision 26-04-004 in Rulemaking 20-10-002, as well as any rehearing and outcome, will directly impact Talton's IPCS in California. Specifically, parties to Rulemaking 20-10-002 have requested rehearing of Decision 26-04-004 and have requested that the Commission reopen the proceeding and direct additional discovery, among other forms of relief. Talton seeks to participate in the proceeding as Talton is also directly impacted by Decision 26-04-004. Granting Talton's motion will ensure that the Commission has a full and complete record on which to determine the changes to be made to Commission rules pertaining to IPCS. For this reason, Talton respectfully requests that it be granted party status in this proceeding.

III. Factual and Legal Contentions Pertinent to the Issues Presented.

Under Rulemaking 20-10-002, Talton faces a significant reduction in operating revenue while continuing to incur substantial fixed and unavoidable costs associated with maintaining secure communications infrastructure, network operations, equipment, cybersecurity compliance, technology upgrades, and customer support. Because these costs do not decrease proportionally with the mandated rate reductions, the cumulative impact of the California rate cap in Decision 26-04-004 threatens Talton's ability to sustain the secure communications ecosystem, legal access programs, and innovative services that support access to justice, family connectivity, and

institutional operations. The impact to Talton is directly relevant to the issues presented in Rulemaking 20-10-002.

IV. Notice.

Service of notices, orders, and other correspondence in this proceeding should be directed to Talton through its undersigned counsel at the address set forth below:

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If granted party status in this proceeding, Talton requests email-only service in this proceeding.

V. Conclusion.

Talton's participation in this proceeding will not prejudice any party and will not delay the schedule or broaden the scope of the issues in the proceeding. Rather, Talton's participation will allow the Commission to have a full and complete record for which to determine changes to rules pertaining to IPCS. For the reasons stated above, Talton respectfully requests that the Commission grant this Motion for Party Status filing.

Dated: June 12, 2026

Respectfully submitted,

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