

## APPENDIX A

# Calling Services for Incarcerated People

## Third Mandatory Data Collection

### Word Template

### Introduction and Instructions

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As set forth in the Instructions for the Third Mandatory Data Collection (Instructions), a full response to the data collection includes completion of this Word template, which shall contain responses to questions identified in the Instructions as requiring a narrative explanation. This template shall also be used to provide any additional information needed to ensure that your response is full and complete and to identify and explain any caveats associated with your response. This template shall also include formulas, explanations, and appropriate references for calculations, where necessary, including any explanations needed to make your entries on the Excel template transparent and understandable.

In this template, we have consecutively numbered each of the inquiries identified in the Instructions as requiring a narrative explanation and included a cross reference to the appropriate section of the Instructions. Thus, all cross references in this template are to the Instructions. For any additional explanatory responses beyond those explicitly required by the Instructions, please number that response after the last numbered inquiry in this document and, as part of that response, clearly specify the question in the Instructions to which your answer corresponds.

All terms defined in the Instructions have the same meaning where they are used in this document.

### General Information (Section IV.A. of the Instructions)

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Section IV.A of the Instructions requires you to provide general information and data about the Company and its Affiliates, among other matters. Specifically, we require you to respond to the following inquiries here:

1. **Company Name:** As instructed in section IV.A.(1), enter the Company's name.

[[Insert Provider Response Here]]

2. **Non-ICS Business Segments:**

- a. As instructed in section IV.A.(9)(c), describe generally the operations of each listed non-ICS Business Segment.

[[Insert Provider Response Here]]

- b. As instructed in section IV.A.(9)(e), describe in detail all non-ICS Business Segments the Company or an Affiliate provided at or for Facilities, or to Incarcerated Persons or those they call, during the Reporting Period.

[[Insert Provider Response Here]]

- c. As instructed in section IV.A.(9)(f), describe in detail how, if at all, the Company's ICS Business Segments and non-ICS Business Segments interact with each other.

*[[Insert Provider Response Here]]*

3. **Accounting and Record-Keeping Systems:** As instructed in section IV.A.(16), describe in detail the Accounting Entity's accounting and record-keeping systems.

*[[Insert Provider Response Here]]*

4. **Mandatory Data Collection Response:** As instructed in section IV.A.(17), provide an overview of how the Company used its accounting and record-keeping systems to respond to this Mandatory Data Collection. As part of this overview, explain the process by which the Company used data from income statements, balance sheets, general ledger, subledger, journals, department, division, or other organization group accounts or subaccounts, and other records or sources of financial data to develop, compile, assign, attribute, allocate or report Company-wide, service-specific, and facility-specific revenues, investments, and expenses, as required by this Mandatory Data Collection. Identify the sources for all depreciation and amortization schedules or asset life projections used to determine the amount of depreciation and amortization expenses reported and how these expenses are derived using these schedules and projections or other methods in lieu of or in combination with these schedules and projections. Explain how Company-wide, service-specific, facility-specific, department, division, or other organization group data are used to determine how costs are incurred in order to assign, attribute, or allocate investments and expenses, as required by this Mandatory Data Collection, including, for example, data as to the number of calls or call minutes, ADP, headcounts, labor hours, or salaries; computer processing, electronic equipment or other inside or outside plant equipment, circuit, and electric power use or capacity; internal or external maintenance or computer-center help desk requests, tickets, orders or dispatch numbers; and purchase orders, transactions, or other measures of resource use and cost causation.

*[[Insert Provider Response Here]]*

5. **Representative Information:** As instructed in section IV.A.(18), address in detail whether the information collected through the data collection will be representative of the Company's future ICS-Related Operation given the effects of the COVID-19 pandemic on those operations during the Reporting Period. Identify for the two-year period January 1, 2022, to December 31, 2023, any specific known and measurable changes to the Company's ICS-related investments, expenses, revenues, and demand that are not reflected in the data collected through this data collection.

*[[Insert Provider Response Here]]*

6. **Sources:** As instructed in section IV.A.(19), identify the source for any data or any document included in or relied upon in your response.

*[[Insert Provider Response Here]]*

## **Company-Wide Information (Section IV.C. of the Instructions)**

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Section IV.C of the Instructions requires you to provide general financial data and other information about the Company. Use the section below to complete the requests for information in the Company-Wide Information section.

### **Overall Financial Information (Section IV.C.1. of the Instructions)**

Section IV.C.1 of the Instructions directs you to provide financial data and other information about the Company. All financial data must comply with Generally Accepted Accounting Principles (GAAP). The carrying value of all assets, both tangible and intangible, shall reflect the results of the most recent impairment testing, and any adjustments required to account for any impairment loss shall be separately identified.

7. As instructed in section IV.C.1, explain in detail the process the Company used to comply with this requirement and provide any additional information needed to make that process fully transparent and understandable. If the carrying value of all assets did not reflect the results of the most recent impairment testing and any adjustments required to account for any impairment loss separately on the excel spreadsheet, explain in detail the following:
  - a. Why an impairment test is not now necessary;
  - b. When impairment testing normally occurs under Company policy; and
  - c. Identify with specificity any accounting adjustments that were made at the time of the most recent impairment testing.

[[Insert Provider Response Here]]

### **Cost Allocation (Section IV.C.2.a. of the Instructions)**

Section IV.C.2.a of the Instructions requires you to perform a cost allocation.

8. As instructed in section IV.C.2.a.(9), fully document, explain, and justify all cost assignments, attributions, and allocations in this section and submit additional workpapers developed using Excel spreadsheets.

[[Insert Provider Response Here]]

### **Weighted Average Cost of Capital (Section IV.C.2.c. of the Instructions)**

Section IV.C.2.c. of the Instructions requires you to elect to use the default Weighted Average Cost of Capital of 9.75% or an alternative Weighted Average Cost of Capital.

9. As instructed in section IV.C.2.c.(2), if you elect to use an alternative Weighted Average Cost of Capital greater than 9.75%, fully document your election by submitting data, formulas, cost of equity analyses using, for example, the Discounted Cash Flow Model or Capital Asset Pricing Model, calculations, and worksheets, explain, and justify the development of each claimed component. As noted in the Instructions, failure to fully document, explain, and justify each

claimed component may result in the application of the default Weighted Average Cost of Capital of 9.75%.

- a. Cost of debt;
- b. Cost of preferred stock;
- c. Cost of equity;
- d. Total debt outstanding in dollars and as a percent of total capital outstanding (the sum of debt, preferred stock, and equity outstanding);
- e. Total preferred stock outstanding and as a percent of total capital outstanding;
- f. Total equity outstanding and as a percent of total capital outstanding; and
- g. Weighted Average Cost of Capital.

[[Insert Provider Response Here]]

## Cash Working Capital (Section IV.C.2.d. of the Instructions)

Section IV.C.2.d. of the Instructions requires you to elect whether to include an allowance for Cash Working Capital in the Company's Net Capital Stock.

10. As instructed in section IV.C.2.d.(2), if you elect to include an allowance for Cash Working Capital in the Company's Net Capital Stock, you are required to report the allowance claimed for each Year of the Reporting Period on the Excel template separately for: (a) Inmate Calling Services; (b) Automated Payment Service; (c) Live Agent Service; and (d) Paper Bill/Statement Service. We require you to submit a lead-lag study or the equivalent that estimates the average number of days between the payment of expenses and the receipt of revenues and average daily cash expenses as support for each claimed allowance. Here, we require you to fully document, explain, and justify each claimed allowance.

[[Insert Provider Response Here]]

## Optional Allocations and Adjustments (Section IV.C.2.f. of the Instructions)

11. As instructed in section IV.C.2.f.(1), state whether the Company elects to further separate its investments, expenses, Net Capital Stock, and Annual Total Expenses between interstate/international and intrastate Inmate Calling Services, Automated Payment Service, Live Agent Service, and Paper Bill/Statement Service to reflect any measurable differences between the cost incurred to provide interstate/international and intrastate services. If you elect to separate the Company's investments, expenses, Net Capital Stock, and Annual Total Expenses between interstate/international and intrastate Inmate Calling Services, Automated Payment Service, Live Agent Service, and Paper Bill/Statement Service, you must: (a) fully document, explain, and justify this separation below; and (b) submit additional Excel spreadsheets, similar in design and level of data disaggregation to those in the Excel template, showing in detail each aspect of the Company's separations processes. These showings here and in the Excel spreadsheets must fully document and justify each aspect of the processes by which the separated interstate/international Inmate Calling Services investment and expenses are further assigned, attributed, or allocated to or among each of the Company's Facilities, and how the Net Capital Stock and Annual Total Expenses for each of these Facilities are developed. Electing this cost allocation option does not relieve the Company of its obligation to report its unseparated investments, expenses, Net Capital

Stock, and Annual Total Expenses on the Excel template and in accordance with the instructions for reporting unseparated data.

[[Insert Provider Response Here]]

12. As instructed in section IV.C.2.f.(2), state whether the Company elects to further adjust its investments, expenses, Net Capital Stock, and Annual Total Expenses developed in accordance with the instructions set out in this document, for any other reason. If you elect to make such an adjustment, you must: (a) fully document, explain, and justify it below; and (b) submit additional Excel spreadsheets, similar in design and level of data disaggregation to those in the Excel template, showing in detail each aspect of the Company's adjustments, including all changes to the Company's data, cost allocation procedures, and results. If the Company also elects to further separate its investments, expenses, Net Capital Stock, and Annual Total Expenses as specified in section IV.C.2.f.(1), you also must separately justify and document the impact of any further adjustments in response to this inquiry upon your results under section IV.C.2.f.(1). Electing this additional adjustment option does not relieve the Company of its obligation to report its unseparated and unadjusted investments, expenses, Net Capital Stock, and Annual Total Expenses on the Excel template and in accordance with the instructions for reporting unseparated and unadjusted data.

[[Insert Provider Response Here]]

## Site Commissions (Section IV.C.3.a. of the Instructions)

Section IV.C.3.a. of the Instructions requires you to report, among other things, the total amount of In-Kind Site Commissions paid by the Company during each Year of the Reporting Period. Here, we require you to do the following:

13. **Total In-Kind Site Commissions:** As instructed in section IV.C.3.a.(2)(b)(i), describe your Legally Mandated, In-Kind payments in detail. Specifically describe each Security Service that you classify as an In-Kind Site Commission payment. Also specifically describe any other payment, gift, exchange of services or goods, fee, technology allowance, or product that you classify as an In-Kind Site Commission payment.

[[Insert Provider Response Here]]

14. **Total In-Kind Site Commissions:** As instructed in section IV.C.3.a.(3)(b)(i), describe your Contractually Prescribed, In-Kind payments in detail. Specifically describe each Security Service that you classify as an In-Kind Site Commission payment. Also specifically describe any other payment, gift, exchange of services or goods, fee, technology allowance, or product that you classify as an In-Kind Site Commission payment.

[[Insert Provider Response Here]]

15. **Site Commissions Allocation Methodology:** As instructed in section IV.C.3.a.(4), fully describe, document, explain, and justify the allocation methodology you use to allocate site commission payments between ICS and Non-ICS operations in situations where you made Site Commission payments for both ICS and non-ICS Operations.

[[Insert Provider Response Here]]

## Security Services Not Classified as Site Commissions (Section IV.C.3.b. of the Instructions)

Section IV.C.3.b of the Instructions requires you to provide Company-level information on Security Services Not Classified as Site Commissions. Use the section below to respond to the following requests for information regarding your Security Services Not Classified as Site Commissions.

16. **Law Enforcement Support Services:** As instructed in section IV.C.3.b.(1)(a)(i), identify by name and describe each service you classify as a law enforcement support service, including a description of the specific tasks and functions covered by this service and whether you routinely offer this service in connection with ICS.

*[[Insert Provider Response Here]]*

17. **Call Security Services:** As instructed in section IV.C.3.b.(1)(b)(i), identify by name and describe each service you classify as a call security service, including a description of the specific tasks and functions covered by this service and whether you routinely offer this service in connection with ICS.

*[[Insert Provider Response Here]]*

18. **Call Recording Services:** As instructed in section IV.C.3.b.(1)(c)(i), identify by name and describe each service you classify as a call recording service, including a description of the specific tasks and functions covered by this service and whether you routinely offer this service in connection with ICS.

*[[Insert Provider Response Here]]*

19. **Call Monitoring Services:** As instructed in section IV.C.3.b.(1)(d)(i), identify by name and describe each service you classify as a call monitoring service, including a description of the specific tasks and functions covered by this service and whether you routinely offer this service in connection with ICS.

*[[Insert Provider Response Here]]*

20. **Voice Biometrics Services:** As instructed in section IV.C.3.b.(1)(e)(i), identify by name and describe each service you classify as a voice biometric service, including a description of the specific tasks and functions covered by this service and whether you routinely offer this service in connection with ICS.

*[[Insert Provider Response Here]]*

21. **Other Services:** As instructed in section IV.C.3.b.(1)(f)(i), identify by name and describe each Security Service you provide that is not classified under one of the foregoing subcategories, including a description of the specific tasks and functions covered by each service and whether you routinely offer each service in connection with ICS.

*[[Insert Provider Response Here]]*

22. As instructed in section IV.C.3.b.(2), specifically describe each Security Service provided by you that you do not classify as a Site Commission and is *not offered in connection* with ICS.

[[Insert Provider Response Here]]

23. As instructed in section IV.C.3.b.(3), specifically describe any other payment, gift, exchange of services or goods, fee, technology allowance, or product provided for security purposes that you do not classify as a Site Commission payment. Reporting in response to this question must be exclusive of the data reported in connection with Site Commissions to prevent double-counting of Security Services.

[[Insert Provider Response Here]]

## Ancillary Services (Section IV.C.3.c. of the Instructions)

Section IV.C.3.c. of the Instructions requires you to provide Company-level information on Ancillary Services costs and revenues and Revenue-Sharing Agreements in connection with your Ancillary Services. Use the section below to respond to the following requests for information regarding your Ancillary Services.

24. As instructed in section IV.C.3.c.(1)(a)(i), if you charged Customers more than one Permissible Ancillary Service Charge fee in connection with the same interstate, international, or mixed-jurisdictional transaction during the Reporting Period, describe in detail the circumstances relating to those charges. Your description shall include, in addition to all other relevant information, a list of the specific transactions for which you charged multiple fees, the fee charged in each transaction, the functions that were covered by each fee, and the total amounts that Customers paid for each fee.

[[Insert Provider Response Here]]

25. **Payment Card Processing for Automated Payment Service:** As instructed in section IV.C.3.c.(2)(a)(iii), describe payment card processing services in connection with your Automated Payment Services for each Year of the Reporting Period. Identify whether the payment card processing was performed by the Company, an Affiliate, or a Third Party. If provided by an Affiliate or a Third Party, identify the Affiliate or Third Party.

[[Insert Provider Response Here]]

26. **Single-Call and Related Services:** As instructed in section IV.C.3.c.(2)(d)(vi), state whether any entity other than the Company charged Customers Single-Call and Related Services Fees in connection with the Company's ICS-Related Operations during each Year of the Reporting Period. If so, list each such entity, indicate whether each listed entity is a Third Party, and provide the amount of such fees each listed entity charged Customers during each Year of the Reporting Period.

[[Insert Provider Response Here]]

27. **Payment Card Processing for Third-Party Financial Transaction Services:** As instructed in section IV.C.3.c.(2)(e)(i), describe payment card processing services performed in connection with Third-Party Financial Transaction Services during each Year of the Reporting Period. Identify whether the payment card processing was performed by the Company, an Affiliate, or a Third Party. If provided by an Affiliate or a Third Party, identify the Affiliate or Third Party.

*[[Insert Provider Response Here]]*

28. **Entities Other Than the Company Charging Customers for Third-Party Financial Transaction Services:** As instructed in section IV.C.3.c.(2)(e)(vii), state whether any entity other than the Company charged Customers for Third-Party Financial Transaction Services in connection with the Company's ICS-Related Operations during each Year of the Reporting Period. If so, list each such entity and provide the amount of such fees each listed entity charged Customers during each Year of the Reporting Period.

*[[Insert Provider Response Here]]*

29. **Payment Card Processing Revenues for Automated Payment Service:** As instructed in section IV.C.3.c.(3)(a)(i)(aa), describe the payment card processing services in connection with Automated Payment Service revenue. Identify whether the payment card processing was performed by the Company, an Affiliate, or a Third Party. If payment card processing was performed by an Affiliate or a Third Party, identify the Affiliate or Third Party.

*[[Insert Provider Response Here]]*

30. **Automated Payment Service Revenue-Sharing Agreements:** As instructed in section IV.C.3.c.(3)(a)(ii)(aa), provide the information requested below under the Ancillary Services Revenue-Sharing Agreements question for any Revenue-Sharing Agreement with an Affiliate or a Third Party in connection with Automated Payment Service, including for any payment card processing functions.

*[[Insert Provider Response Here]]*

31. **Single-Call and Related Services Revenue-Sharing Agreements:** As instructed in section IV.C.3.c.(3)(d)(ii)(aa), provide the information requested below under the Ancillary Services Revenue-Sharing Agreements question for any Revenue-Sharing Agreement with an Affiliate or a Third Party in connection with Single-Call and Related Services.

*[[Insert Provider Response Here]]*

32. **Payment Card Processing Revenues from Third-Party Financial Transaction Services:** As instructed in section IV.C.3.c.(3)(e)(i)(aa), describe the payment card processing services in connection with Third-Party Financial Transaction Fee revenues, including whether they were performed by the Provider, an Affiliate, or a Third Party. If provided by an Affiliate or a Third Party, identify each Affiliate or Third Party. State whether the Company charged Customers payment card processing fees for each Year during the Reporting Period. If so, enter the amount of such fees charged to Customers for each Year during the Reporting Period.

*[[Insert Provider Response Here]]*

33. **Third-Party Financial Transaction Fee Revenue-Sharing Agreements:** As instructed in section IV.C.3.c.(3)(e)(ii)(aa), provide the information requested below under the Ancillary Services Revenue-Sharing Agreements question for any Revenue-Sharing Agreement with an Affiliate or a Third Party in connection with Third-Party Financial Transaction Fees.

[[Insert Provider Response Here]]

34. **Ancillary Services Revenue-Sharing Agreements:** As instructed in section IV.C.3.c.(4) and other than the Revenue-Sharing Agreements identified in response to questions 30, 31, and 33, identify any other Revenue-Sharing Agreements between the Provider and any Affiliate and/or Third Party in connection with any Ancillary Service. For each Revenue-Sharing Agreement identified, provide, at a minimum, the following information:

- a. The parties to the agreement;
- b. Identify each payor and payee under the agreement;
- c. Whether any party to the agreement is an Affiliate or a Third Party;
- d. The Ancillary Service for which revenue is required to be shared under the agreement;
- e. The amount of revenue to be shared under the terms of the agreement;
- f. The total amount of revenue shared for each Year during the Reporting Period;
- g. The total amount of revenue shared for each Ancillary Service; and
- h. The effective and termination dates of the agreement.

[[Insert Provider Response Here]]

## **Affiliate Transactions (Section IV.C.3.d. of the Instructions)**

35. As instructed in section IV.C.3.d.(1), describe in detail all types of transactions between the Accounting Entity and its non-Accounting Entity Affiliates.

[[Insert Provider Response Here]]

## **Instructions Relating to Subcontracts to Provide ICS (Section IV.C.3.e. of the Instructions)**

36. **Narrative Description of a Subcontract to Provide ICS:** As instructed in section IV.C.3.e.(2), if a Provider contracts with a Subcontractor to provide any aspect of ICS, the Provider and the Subcontractor shall explain each such arrangement. At a minimum, such explanation shall include:

- a. The name of the Provider with the contractual or other agreement with a Facility or contracting authority for the provision of ICS;
- b. The name of the Subcontractor;
- c. The services provided by the Subcontractor under the agreement;
- d. The Facilities at which the Subcontractor provides services under the agreement;
- e. A description of the ICS-Related Operations provided by the Provider and the Subcontractor;
- f. The types of ICS calls billed by the Provider and the Subcontractor; and

- g. A description of any Revenue-Sharing Agreement between the Provider and the Subcontractor.

[[Insert Provider Response Here]]

## **Facility-Specific Information (Section IV.D. of the Instructions)**

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Section IV.D of the Instructions requires you to provide general financial data and other information at the Facility level.

### **Facility-Specific Cost Allocation Instructions (Section IV.D.1.a. of the Instructions)**

Section IV.D.1.a. of the Instructions requires you to perform a cost allocation among the Facilities at which the Company provides calling services to incarcerated people.

37. As instructed in section IV.D.1.a., fully document, explain, and justify all cost assignments, attributions, and allocations in your cost allocation.

[[Insert Provider Response Here]]

### **Facility-Specific Demand and Revenue Data (Section IV.D.1.d. of the Instructions)**

38. As instructed in section IV.D.1.d.(1), If you repeat or merge data across multiple facilities covered by a single contract, explain why you did so and how you reported the data.

[[Insert Provider Response Here]]

39. As instructed in section IV.D.1.d.(1)(i)(aa), if you do not know a Facility's Average Daily Population and have provided your best estimate of that Average Daily Population in the Excel template, explain the basis for this estimate.

[[Insert Provider Response Here]]

### **Facility-Specific Site Commissions (Section IV.D.2.b. of the Instructions)**

40. **Site Commissions:** As instructed in section IV.D.2.b.(1)(c), identify for each Year of the Reporting Period any Site Commissions paid by the Company that related to any Facility and that included both a monetary payment and an in-kind payment. Provide the name of the Facility, the entity to which you paid the Site Commission, and the amount of the monetary payment, and describe in detail the in-kind payment, including any Security Service.

[[Insert Provider Response Here]]

41. As instructed in section IV.D.2.b.(1)(d), list for each Year of the Reporting Period each entity to which you paid a Site Commission. Provide the name of the Facility for which that entity is responsible and the amount paid to that entity without regard to whether the Site Commission was Legally Mandated, Contractually Prescribed, Fixed, Variable, Monetary, or In-Kind.

[[Insert Provider Response Here]]

42. **Fixed Site Commissions:** As instructed in section IV.D.2.b.(2)(d)(i)(ac), if the Legally Mandated, Fixed, Monetary Site Commission was imposed at the contract level (e.g., a minimum annual guarantee is due annually under a contract covering multiple Facilities), describe the methodology used to allocate the Legally Mandated, Fixed, Monetary Site Commission payments among Facilities covered by the contract.

[[Insert Provider Response Here]]

43. **Legally Mandated Total In-Kind Site Commissions:** As instructed in section IV.D.2.b.(2)(e)(ii), describe any Legally Mandated, In-Kind Site Commission payments in detail. Specifically describe each Security Service provided to the Facility that you classify as an In-Kind Site Commission payment. Also specifically describe any other payment, gift, exchange of services or goods, fee, technology allowance, or product provided to the Facility that you classify as an In-Kind Site Commission payment.

[[Insert Provider Response Here]]

44. **Fixed Site Commissions:** As instructed in section IV.D.2.b.(2)(e)(iii)(ac), if the Legally Mandated, Fixed, In-Kind Site Commission was imposed at the contract level (e.g., a minimum annual guarantee is due annually under a contract covering multiple Facilities), describe the methodology used to allocate the Legally Mandated, Fixed, In-Kind Site Commission payments among Facilities covered by the contract.

[[Insert Provider Response Here]]

45. **Fixed Site Commissions:** As instructed in section IV.D.2.b.(3)(b)(ii)(ac), if the Contractually Prescribed, Fixed, Monetary Site Commission was imposed at the contract level (e.g., a minimum annual guarantee is due annually under a contract covering multiple Facilities), describe the methodology used to allocate the Contractually Prescribed, Fixed, Monetary Site Commission payments among Facilities covered by the contract.

[[Insert Provider Response Here]]

46. **Contractually Prescribed Total In-Kind Site Commissions:** As instructed in section IV.D.2.b.(3)(c)(ii), describe your Contractually Prescribed, In-Kind Site Commission payments in detail. Specifically describe each Security Service provided to the Facility that you classify as an In-Kind Site Commission payment. Also specifically describe any other payment, gift, exchange of services or goods, fee, technology allowance, or product provided to the Facility that you classify as an In-Kind Site Commission payment.

[[Insert Provider Response Here]]

47. **Fixed Site Commissions:** As instructed in section IV.D.2.b.(3)(c)(iii)(ac), if the Contractually Prescribed, Fixed, In-Kind Site Commission was imposed at the contract level (e.g., a minimum annual guarantee is due annually under a contract covering multiple Facilities), describe the methodology used to allocate the Contractually Prescribed, Fixed, In-Kind Site Commission payments among Facilities covered by the contract.

[[Insert Provider Response Here]]

48. **Site Commissions Allocation Methodology:** As instructed in section IV.D.2.b.(4), fully describe, document, explain, and justify the allocation methodology you used to allocate Site Commission payments between your ICS and Non-ICS operations at each Facility during each Year of the Reporting Period in situations where you made Site Commission payments for both ICS and non-ICS Operations.

[[Insert Provider Response Here]]

## Facility Specific Security Services Not Classified as Site Commissions (Section IV.D.2.c. of the Instructions)

49. **Law Enforcement Support Services:** As instructed in section IV.D.2.c.(1)(a)(i), for each Facility and for each Year of the Reporting Period, identify by name and describe each service you classify as a law enforcement support service, including a description of the specific tasks and functions covered by this service and whether you routinely offer this service in connection with ICS.

[[Insert Provider Response Here]]

50. **Call Security Services:** As instructed in section IV.D.2.c.(1)(b)(i), for each Facility and for each Year of the Reporting Period, identify by name and describe each service you classify as a call security service, including a description of the specific tasks and functions covered by this service and whether you routinely offer this service in connection with ICS.

[[Insert Provider Response Here]]

51. **Call Recording Services:** As instructed in section IV.D.2.c.(1)(c)(i), for each Facility and for each Year of the Reporting Period, identify by name and describe each service you classify as a call recording service, including a description of the specific tasks and functions covered by this service and whether you routinely offer this service in connection with ICS.

[[Insert Provider Response Here]]

52. **Call Monitoring Services:** As instructed in section IV.D.2.c.(1)(d)(i), for each Facility and for each Year of the Reporting Period, identify by name and describe each service you classify as a call monitoring service, including a description of the specific tasks and functions covered by this service whether you routinely offer this service in connection with ICS.

[[Insert Provider Response Here]]

53. **Voice Biometrics Services:** As instructed in section IV.D.2.c.(1)(e)(i), for each Facility and for each Year of the Reporting Period, identify by name and describe each service you classify as a voice biometric service, including a description of the specific tasks and functions covered by this service and whether you routinely offer this service in connection with ICS.

[[Insert Provider Response Here]]

54. **Other Services:** As instructed in section IV.D.2.c.(1)(f)(i), for each Facility and for each Year of the Reporting Period, identify by name and describe each Security Service that is not classified under one of the foregoing subcategories, including a description of the specific tasks and functions covered by each service and whether you routinely offer each service in connection with ICS.

[[Insert Provider Response Here]]

55. As instructed in section IV.D.2.c.(2), specifically describe each Security Service you provided at the Facility that you do not classify as a Site Commission and is *not offered in connection* with ICS.

[[Insert Provider Response Here]]

56. As instructed in section IV.D.2.c.(3), specifically describe any other payment, gift, exchange of goods or services, fee, technology allowance, or product provided for security purposes at the Facility that you do not classify as a Site Commission payment. Reporting in response to this question must be exclusive of the data reported in connection with Site Commissions to prevent double-counting.

[[Insert Provider Response Here]]

57. As instructed in section IV.D.2.c.(4), fully describe, document, explain, and justify the allocation methodology you use to allocate Security Services between ICS and non-ICS operations at each Facility during each Year of the Reporting Period in situations where Security Services offered by you also shared elements or overlapped with your non-ICS operations at each Facility.

[[Insert Provider Response Here]]

## **Facility Specific Ancillary Services Information (Section IV.D.2.d. of the Instructions)**

58. **Automated Payment Fees and Third-Party Transaction Fees Charged in the Same Transaction:** As instructed in section IV.D.2.d.(5) and for each Facility for each Year of the Reporting Period, identify any transactions for which both Automated Payment Fees and Third-Party Transaction Fees were charged, describe the services provided for the transaction, and apportion the fees charged for the services provided for each.

[[Insert Provider Response Here]]

59. **Payment Card Processing Revenue for Automated Payment Fees:** As instructed in section IV.D.2.d.(6)(a), describe the payment card processing functions performed at each Facility, including whether they were performed by the Provider, an Affiliate, or a Third Party. If such functions were performed by an Affiliate or a Third Party, identify the Affiliate or Third Party.

[[Insert Provider Response Here]]

60. **Other Entities that Charged Customers for Single-Call and Related Services:** As instructed in section IV.D.2.d.(14), state whether any entity other than the Company charged Customers Single-Call and Related Services Fees in connection with the Company's ICS-Related Operations at each Facility for each Year during the Reporting Period. If so, list each such entity, indicate whether each listed entity is a Third Party, and provide the amount of such fees each listed entity charged Customers at each Facility during each Year of the Reporting Period.

[[Insert Provider Response Here]]

61. **Payment Card Processing Revenue from Third-Party Financial Transaction Fees:** As instructed in section IV.D.2.d.(27)(a), describe the payment card processing services in connection with revenue reported for Third-Party Financial Transaction Fees, including whether they were performed by the Provider, an Affiliate, or a Third Party. If such services were provided by an Affiliate or a Third Party, identify the Affiliate or Third Party.

[[Insert Provider Response Here]]

62. **Other Entities That Charged Customers for Third-Party Financial Transaction Services:** As instructed in section IV.D.2.d.(33), state whether any entity other than the Company charged Customers for Third-Party Financial Transaction Services in connection with the Company's ICS-Related Operations at each Facility for each Year of the Reporting Period. If so, list each such entity and provide the amount of such fees each listed entity charged Customers at each Facility for each Year of the Reporting Period.

[[Insert Provider Response Here]]

## Additional Provider Explanatory Responses

63. [[Insert Additional Provider Explanatory Response Here]]

64. [[Insert Additional Provider Explanatory Response Here]]

**FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT**

We have estimated that each ICS provider's response to Form 2302(a) (consisting of Word and Excel Templates) will take 350 hours on average. Our estimate includes the time to read the instructions, look through existing records, gather and maintain the required data, and complete and review the form. It also includes the time it will take each provider to: (a) submit audited financial statements or reports, or similar documentation, for 2019, 2020, and 2021, to the extent they have been produced in the ordinary course of business; (b) respond to any Commission requirement that the provider clarify or supplement its response to the data collection; and (c) keep all records necessary to implement this collection and make such records available to the Commission upon request. If you have any comments on this estimate, or on how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission, AMD-PERM, Washington, DC 20554, Paperwork Reduction Project (3060-1300). We will also accept your comments via the Internet if you send them to [pra@fcc.gov](mailto:pra@fcc.gov). Please **DO NOT SEND COMPLETED APPLICATIONS TO THIS ADDRESS**. Remember—you are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB Control Number of 3060-1300.

**THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, P.L. 104-13, OCTOBER 1, 1995, 44 U.S.C. 3507.**