

# APPENDIX A

## Incarcerated People’s Communications Services

### 2023 Mandatory Data Collection

### Word Template

#### Introduction and Instructions

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As set forth in the Instructions for the 2023 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 section and 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. **IPCS or Ancillary Services:**

- a. As instructed in section IV.A.(8)(b), describe in detail each type of Audio IPCS that the Company provided at or for Facilities during 2022.

[[Insert Provider Response Here]]

- b. As instructed in section IV.A.(8)(c), describe in detail each type of Video IPCS that the Company provided during 2022. Identify the transmission technology, the service parameters and the key performance indicators used to provide and evaluate each type of Video IPCS. Describe the steps the Company took to monitor these services to ensure they functioned as intended.

[[Insert Provider Response Here]]

- c. As instructed in section IV.A.(8)(d), describe the infrastructure, including any Wi-Fi routers, wiring, or other infrastructure located within Facilities, the Company provided to deliver each of its Video IPCS offerings during 2022. Explain how, if at all, the infrastructure the Company provided to deliver Video IPCS differed from the infrastructure it provided to deliver Audio IPCS. To what extent was the Company, as opposed to the Facility, generally responsible for providing and maintaining any infrastructure that is located within a Facility. Submit any information the Company has on the capabilities (e.g., speed and latency) of the Video IPCS infrastructure located within the Facilities the Company serves.

[[Insert Provider Response Here]]

- d. As instructed in section IV.A.(8)(e), identify each type of device that the Company used to provide IPCS during 2022, including any devices that the Company provided to Incarcerated People or to those with whom they communicate. Provide the average per-unit price that the Company paid for each identified type of device used during 2022.

[[Insert Provider Response Here]]

- e. As instructed in section IV.A.(8)(f), identify and describe the infrastructure, devices, and other equipment and technologies the Company used to provide:
  - (i) Both Audio IPCS and Video IPCS;
  - (ii) Only Audio IPCS; and
  - (iii) Only Video IPCS.

[[Insert Provider Response Here]]

- f. As instructed in section IV.A.(8)(g), describe generally whether the Company or the Facilities the Company serves provided any broadband connection used to provide IPCS. Where the Company provided the broadband connection, explain the extent to which the Company used those connections to provide Audio IPCS as well as Video IPCS, and the extent to which Facilities used those connections for their own communications. Identify the broadband service level required for the Company's Audio IPCS and Video IPCS offerings to function as intended, and generally discuss the availability of this service level at the Facilities the Company serves.

[[Insert Provider Response Here]]

- g. As instructed in section IV.A.(8)(h), describe the type of data storage, if any, the Company used to retain the contents of, or information regarding, incarcerated people's communications during 2022. Generally describe the amount of storage space required, expressed in terms of the amount of data used, to store the contents of, and data regarding, incarcerated people's communications. Additionally, describe in detail any contractual provisions, including any provisions addressing the storage system, data retention period, or retrieval and analysis of stored information, that required or addressed such data storage. Also identify and describe, if applicable, the software the Company used to store the contents of, or information regarding, incarcerated people's communications.

[[Insert Provider Response Here]]

- h. As instructed in section IV.A.(8)(i), explain how the Company markets its Video IPCS to consumers, including identifying any packages, bundles, and other services or features included with Video IPCS. Additionally, include the units of sale the Company uses to sell Video IPCS to consumers (e.g., calls, minutes, or data allotments).

*[[Insert Provider Response Here]]*

- i. As instructed in section IV.A.(8)(j), explain any conditions or limitations in place that restrict how Incarcerated People may use the Company’s Video IPCS, including accessing the service, the availability of the service, and any other limitations that affect usage. Separately, identify whether these conditions are imposed by the Company or by the Facility.

*[[Insert Provider Response Here]]*

- j. As instructed in section IV.A.(8)(k), we seek information regarding the Safety and Security Measures the Company provided during 2022. To the extent the set of Safety and Security Measures provided by the Company varied among the Facilities it served, or among the types of IPCS it provided, describe the reasons for that variation. In particular, explain whether, and if so why, the Safety and Security Measures provided differ based on: (i) contractual provisions; (ii) Facility restrictions; (iii) differences between Audio IPCS and Video IPCS; or (iv) variables in the infrastructure, devices, and other equipment and technologies used to provide IPCS (e.g., implementation on kiosks versus tablets, or implementation on third-party applications versus internally-developed applications).

*[[Insert Provider Response Here]]*

- k. As instructed in section IV.A.(8)(l), to the extent the Safety and Security Measures provided by the Company varied based on contractual provisions or Facility restrictions, describe the reason(s) for such variation and identify which Safety and Security Measures are involved. Also address:

- (i) Whether the Company offers different Safety and Security Measures based on whether it seeks to provide Audio IPCS, Video IPCS, or both forms of IPCS;
- (ii) Whether the Company offers a standard package of Safety and Security Measures and, if so, whether Contracting Authorities may add to, or subtract from, the package other services, options, or features;
- (iii) Whether the Company requires Contracting Authorities to purchase any Safety and Security Measures as part of a package of services, either with its IPCS offerings or with other Safety and Security Measures; and
- (iv) Whether Contracting Authorities require the Company to provide as a base package, not subject to negotiation, different sets of Safety and Security Measures.

*[[Insert Provider Response Here]]*

- l. As instructed in section IV.A.(8)(m), describe how, if at all, the variations you describe in your responses to the previous two inquires impact the costs that the Company incurs to provide Safety and Security Measures.

*[[Insert Provider Response Here]]*

- m. As instructed in section IV.A.8.(n), the Company may elect to report any other factors that may impact the costs the Company incurs to provide Safety and Security Measures (e.g., fixed costs that may be shared by multiple Safety and Security Measures, the provision of certain Safety and Security Measures at different scales, Facility sizes, or Facility locations), and how those factors impact costs.

*[[Insert Provider Response Here]]*

- n. As instructed in section IV.A.8.(o), if the Company provided any services for which it charged Automated Payment Fees during 2022, describe the functions the Company performed, and the processes the Company used, to complete the underlying Consumer transactions.

*[[Insert Provider Response Here]]*

- o. As instructed in section IV.A.8.(p), if the Company provided any services for which it charged Live Agent Fees during 2022, describe the functions the Company performed, and the processes the Company used, in providing Live Agent Services.

*[[Insert Provider Response Here]]*

- p. As instructed in section IV.A.(8)(q), if the Company provided any services for which it charged Single-Call and Related Services Fees during 2022, describe the functions the Company performed, and the processes the Company used, to facilitate the underlying IPCS calls.

*[[Insert Provider Response Here]]*

- q. As instructed in section IV.A.(8)(r), if the Company provided any services for which it charged Third-Party Financial Transaction Fees during 2022, describe the functions the Company performed, and the processes the Company used, to facilitate the underlying financial transactions.

*[[Insert Provider Response Here]]*

- r. As instructed in section IV.A.(8)(s), if the Company provided any services for which it charged Other Ancillary Services Charges during 2022, identify each type of Other Ancillary Services Charge and its purpose, and describe the functions the Company performed, and the processes the Company used, to provide each Other Ancillary Service.

*[[Insert Provider Response Here]]*

- s. As instructed in section IV.A.(8)(t), if the Company mailed paper bills or statements for any IPCS account and charged Paper Bill/Statement Fees during 2022, describe the Company's policy for issuing and mailing such bills or statements, including any elections that must be made by the account holder or recipient of any mailed bills or statements.

*[[Insert Provider Response Here]]*

3. **Business Segments Other Than IPCS or Ancillary Services:**

- a. As instructed in section IV.A.(9)(d), describe in detail all Business Segments, other than IPCS or Ancillary Services, the Company or an Affiliate provided at or for Facilities, or to Incarcerated People or those they communicate with, during 2022.

[[Insert Provider Response Here]]

- b. As instructed in section IV.A.(9)(e), describe in detail how, if at all, the Company's IPCS or Ancillary Services interact with Business Segments other than IPCS or Ancillary Services.

[[Insert Provider Response Here]]

- c. As instructed in section IV.A.(9)(f), state whether the Company provides any type of IPCS as part of a bundle with, or otherwise provides any type of IPCS in conjunction with, any other type of IPCS and/or Other Products and Services. If the answer is yes, for each such bundle:

- (i) Identify the components of the bundle, and state whether each of those components qualifies as IPCS or as Other Products and Services;
- (ii) Describe in detail the steps the Company employed to ensure its responses to this data collection do not allocate the costs of its Other Products and Services to IPCS or associated Ancillary Services;
- (iii) State whether the Company also provides the bundled IPCS component(s) individually as standalone services;
- (iv) State the price consumers pay for each bundle as a whole, as well as the standalone price of each component within each bundle. For any component offered only as part of a bundle, state what its price would be if it were offered on a standalone basis;
- (v) State whether bundling IPCS with Other Products and Services increases or decreases the Company's overall costs, and identify the specific categories of costs that are affected and how those costs are affected; or, if bundling does not increase or decrease the Company's overall costs, indicate that in the space provided below; and
- (vi) State whether the Company's bundling practices vary among Facilities or contracts, and, if so, describe the variations in detail.

[[Insert Provider Response Here]]

4. **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]]

5. **Mandatory Data Collection Response:** As instructed in section IV.A.(17), provide an overview of how the Company used its accounting and record-keeping system 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 communications 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]]

6. **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 provision of IPCS and associated Ancillary Services. Identify for the two-year period from January 1, 2024, to December 31, 2025, any specific known and measurable changes to the Company's IPCS or Ancillary Services investments, expenses, revenues, and demand that are not reflected in the data collected through this data collection.

[[Insert Provider Response Here]]

7. **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.

8. As instructed in section IV.C.1, explain in detail the process the Company used to ensure GAAP-consistent impairment testing 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 template, explain in detail the following:
  - a. Why an impairment test is not 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]]

9. As instructed in section IV.C.1(1)(b), identify the discrete types of expenses reported for each Capital Expense category.

[[Insert Provider Response Here]]

10. As instructed in section IV.C.1(1)(c), identify the discrete types of expenses reported for each Operating Expense category.

[[Insert Provider Response Here]]

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

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

11. As instructed in section IV.C.2.b.(8), fully document, explain, and justify all cost assignments, attributions, and allocations in this section and submit additional workpapers developed using Excel spreadsheets. As part of your explanation, specifically describe the development of each cost driver or general allocator used to perform any attributions or allocations, and explain the process used to perform each attribution and allocation.

[[Insert Provider Response Here]]

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

Section IV.C.2.d 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.

12. As instructed in section IV.C.2.d., if you elect to use an alternative Weighted Average Cost of Capital greater than 9.75%, fully document each of the following components by submitting data, formulas, cost of equity analyses (using, for example, the Discounted Cash Flow Model or Capital Asset Pricing Model), calculations, and worksheets, and 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.e. of the Instructions)

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

13. As instructed in section IV.C.2.e.(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 2022 in the Excel template separately for: (a) Audio IPCS; (b) Video IPCS; (c) Safety and Security Measures; (d) Automated Payment Services; (e) Live Agent Services; (f) Paper Bill/Statement Services; (g) Single-Call and Related Services; and (h) Third-Party Financial Transaction Services. 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 Audio and Video Ancillary Services Allocations and Adjustments (Section IV.C.2.g. of the Instructions)

14. As instructed in section IV.C.2.g.(1), state whether the Company elects to further separate its investments, expenses, Net Capital Stock, and Annual Total Expenses for Ancillary Services (including each of Automated Payment Services, Live Agent Services, Paper Bill/Statement Services, Single-Call and Related Services, Third-Party Financial Transaction Services, and Other Ancillary Services) between audio Ancillary Services and video Ancillary Services to reflect any measurable differences between the average costs of providing audio Ancillary Services versus video Ancillary Services.

[[Insert Provider Response Here]]

15. As instructed in section IV.C.2.g.(2), if you elect to perform the optional allocation identified in IV.C.2.g.(1), (a) fully document and explain this separation here; 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. 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 in the Excel template and in accordance with the instructions for reporting unseparated data.

[[Insert Provider Response Here]]

## Optional Interstate/International and Intrastate IPCS Allocations and Adjustments (Section IV.C.2.h. of the Instructions)

16. As instructed in section IV.C.2.h.(1), state whether the Company elects to further separate its investments, expenses, Net Capital Stock, and Annual Total Expenses for Audio IPCS, Video IPCS, Safety and Security Measures, Ancillary Services (including each of Automated Payment Services, Live Agent Service, Paper Bill/Statement Service, Single-Call and Related Services, Third-Party Financial Transaction Service, and Other Ancillary Services) between



interstate/international and intrastate services to reflect any measurable differences between the average costs of providing interstate/international versus intrastate services.

[[Insert Provider Response Here]]

17. As instructed in section IV.C.2.h.(2), if the Company elects to perform the optional allocation identified in IV.C.2.g.(3), 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 separation processes. These showings below and in the Excel spreadsheets must fully document and justify each aspect of the processes by which the Company-wide interstate/international or intrastate Audio IPCS, Video IPCS, and Safety and Security Measures investments 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 services are developed for each of these Facilities. As noted in the Instructions, 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 in the Excel template and in accordance with the instructions for reporting unseparated data.

[[Insert Provider Response Here]]

## **Optional Telecommunications Relay Services Showing (Section IV.C.2.i. of the Instructions)**

18. As instructed in section IV.C.2.i.(1), In the Word template, state whether the Company elects to document its estimated annual incremental costs of complying with the Telecommunications Relay Services (TRS) requirements adopted in the 2022 *ICS Order*, to the extent those costs are not reflected in the Company's data for 2022. Annual incremental costs of TRS compliance are those the Company would not have incurred but for its compliance with these TRS requirements. Because shared and common costs will be reflected in the data the Company will be reporting for 2022, you must exclude them from your annual incremental costs of TRS compliance.

[[Insert Provider Response Here]]

19. As instructed in section IV.C.2.i.(2), if you choose to estimate the incremental costs of TRS compliance, provide projections of the following investment and expense items for calendar year 2024 on an Excel worksheet of your own design. To simplify, assume that any capital assets for which costs were or will be incurred during 2023 or 2024 to comply with the TRS requirements will be placed in service on January 1, 2024. Document, explain, and justify your estimates.
- a. Capitalized value of the initial capital outlay for each incremental TRS investment (e.g., equipment that would not have been installed but to comply with the TRS requirements adopted in the 2022 *ICS Order*);
  - b. Year-end remaining undepreciated value of each incremental TRS investment;
  - c. Annual incremental depreciation expense related to each incremental TRS investment;
  - d. Incremental Weighted Average Cost of Capital;
  - e. Annual incremental interest expense on incremental debt used to finance the incremental TRS investments;
  - f. Incremental Return on year-end remaining undepreciated value of each incremental TRS investment;
  - g. Annual incremental federal income taxes on the owner's portion of the incremental Return,
  - h. Annual incremental state income taxes on the owner's portion of the incremental Return,

- i. Annual incremental maintenance and repair expense related to each incremental TRS investment; and
- j. Total annual incremental TRS cost, which is equal to the sum of the annual incremental TRS depreciation expense, maintenance and repair expense, a Return on each incremental TRS investment, and the federal income taxes and state income taxes on the owner's portion of the incremental Return.

[[Insert Provider Response Here]]

## Other Optional Adjustments (Section IV.C.2.j. of the Instructions)

20. As instructed in section IV.C.2.j.(1), 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 in the Word template; and (b) submit additional Excel worksheets, 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 Parts IV.C.2.g.(1) or IV.C.2.g.(3), above, you also must separately justify and document the impact of any further adjustments in response to this Inquiry upon your results under Parts IV.C.2.g.(1) and IV.C.2.g.(3). 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 in 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 2022. Here, we require you to do the following:

21. **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 payment, gift, exchange of services or goods, fee, technology allowance, or product that you classify as an In-Kind Site Commission payment for IPCS and associated Ancillary Services.

[[Insert Provider Response Here]]

22. **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 payment, gift, exchange of services or goods, fee, technology allowance, or product that you classify as an In-Kind Site Commission payment for IPCS and associated Ancillary Services.

[[Insert Provider Response Here]]

23. **Site Commissions Allocation Methodology:** As instructed in section IV.C.3.a.(4), fully describe, document, explain, and justify the allocation methodology you used to allocate Site Commission payments between the Company's IPCS and associated Ancillary Services and

services other than IPCS and associated Ancillary Services in situations where the Company made Site Commission payments for both types of services.

[[Insert Provider Response Here]]

24. As instructed in section IV.C.3.a.(5), state whether the Company pays Site Commissions separately for Audio IPCS and Video IPCS, and explain in detail how these payments differ between the two types of communications, including whether the Company offers to make separate Site Commission payments for audio and video communications and whether correctional authorities request Site Commissions separately for Audio IPCS and Video IPCS.

[[Insert Provider Response Here]]

25. As instructed in section IV.C.3.a.(6), explain whether the formula or formulas used to calculate Monetary Site Commission payments differ depending on whether the communication is audio or video. For example, if a Provider offers to pay or a Contracting Authority asks the Provider to pay a flat sum as a Site Commission, how, if at all, you determine what portions of that Site Commission are allocated to Audio IPCS and Video IPCS.

[[Insert Provider Response Here]]

26. As instructed in section IV.C.3.a.(7), state whether the Company pays pay Site Commissions separately for intrastate IPCS, interstate IPCS, and international IPCS, and explain in detail how these payments differ among jurisdictions, including whether the Company offers to make separate Site Commission payments on interstate, international, and intrastate, communications and whether correctional authorities request such payments.

[[Insert Provider Response Here]]

27. As instructed in section IV.C.3.a.(8), explain whether the formula or formulas used to calculate monetary Site Commission payments differ depending on whether the communication is interstate, international, or intrastate. For example, if a provider offers to pay or a Contracting Authority asks the provider to pay a flat sum as a Site Commission, how, if at all, do you determine what portions of that Site Commission are allocated to intrastate IPCS, interstate IPCS, and international IPCS.

[[Insert Provider Response Here]]

## **Company-Wide Costs of Provider’s Safety and Security Measures (Section IV.C.3.b of the Instructions)**

Section IV.C.3.b of the Instructions requires you to provide Company-level information on the costs of Safety and Security Measures. Use the section below to respond to the following requests for information regarding your costs of Safety and Security Measures.

28. **CALEA Compliance Measures:** As instructed in section IV.C.3.b.(1), identify and describe each of the Safety and Security Measures that the Company took to comply with the Communications Assistance for Law Enforcement Act (CALEA). Include a description of the specific tasks and functions encompassed within each of these Safety and Security Measures, and state whether the Company routinely provides those tasks and functions in connection with IPCS.

[[Insert Provider Response Here]]

29. **Law Enforcement Support Services:** As instructed in section IV.C.3.b.(2), identify and describe each of the Company's Safety and Security Measures that you classify as a law enforcement support service. These services include, but are not limited to, the administration of subpoenas, the administration of crime tip lines, the administration of informant lines, and the maintenance of data repositories for use by law enforcement personnel. Include a description of the specific tasks and functions encompassed within each of these Safety and Security Measures, and state whether the Company routinely provides those tasks and functions in connection with IPCS.

*[[Insert Provider Response Here]]*

30. **Communication Security Services:** As instructed in section IV.C.3.b.(3), identify and describe each of the Company's Safety and Security Measures that you classify as a communications security service. These services include, but are not limited to, implementing measures that allow an Incarcerated Person to call only certain individuals or numbers; implementing measures that limit the individuals or numbers an incarcerated person may call; providing personal identification numbers (PINs) to incarcerated people; providing disclaimers to called parties regarding communication origination; implementing communication-acceptance procedures; preventing three-way communications; preventing chain communications; dual-tone multifrequency detection; manual call control for the Facility; tracking frequently called numbers; implementing incoming communication restrictions; and fraud management. Include a description of the specific tasks and functions encompassed within each of these Safety and Security Measures, and state whether the Company routinely provides those tasks and functions in connection with IPCS.

*[[Insert Provider Response Here]]*

31. **Communication Recording Services:** As instructed in section IV.C.3.b.(4), identify and describe each of the Company's Safety and Security Measures that you classify as a communications-recording service. These services include, but are not limited to, providing a disclaimer regarding recording of communications, recording of communications, and storage of recorded communications. Include a description of the specific tasks and functions encompassed within each of your communication recording services, and state whether the Company routinely provides those tasks and functions in connection with IPCS.

*[[Insert Provider Response Here]]*

32. **Communication Monitoring Services:** As instructed in section IV.C.3.b.(5), identify and describe each of the Company's Safety and Security Measures that you classify as a communications-monitoring service. These services include, but are not limited to, live or real-time monitoring of communications; automatic word detection; communication transcription; and analysis of recordings, which may also include keyword searches. Include a description of the specific tasks and functions encompassed within each of these Safety and Security Measures, and state whether the Company routinely provides those tasks and functions in connection with IPCS.

*[[Insert Provider Response Here]]*

33. **Voice Biometrics Services:** As instructed in section IV.C.3.b.(6), identify and describe each of the Company's Safety and Security Measures that you classify as a voice biometrics service. These services include, but are not limited to, voice printing, voice identification, continuous

voice verification, and voice databasing. Include a description of the specific tasks and functions encompassed within each of these Safety and Security Measures, and state whether the Company routinely provides those tasks and functions in connection with IPCS.

[[Insert Provider Response Here]]

34. **Other Safety and Security Measures:** As instructed in section IV.C.3.b.(7), identify and describe each of the Company’s Safety and Security Measures that are not included in any of the foregoing categories. These services include, but are not limited to, reporting obligations, acquisition of patents to support safety and security technologies, and research and development of new safety and security technologies. Include a description of the specific tasks and functions encompassed within each of these Safety and Security Measures, and state whether the Company routinely provides those tasks and functions in connection with IPCS.

[[Insert Provider Response Here]]

35. As instructed in section IV.C.3.b, document and explain the processes you used to sort each discrete Safety and Security Measure into one of the seven categories and estimate the percentages reported for each category as directed.

[[Insert Provider Response Here]]

## **Service-Specific Costs of Providing Safety and Security Measures (Section IV.C.3.c. of the Instructions)**

36. As instructed in section IV.C.3.c, document and explain the processes you used to estimate the percentages of total expenses reported for each category of Safety and Security Measures attributable to (1) Audio IPCS; (2) Video IPCS; (3) Ancillary Services; or (4) Other Products and Services. Describe the development of the criteria used to perform any estimations.

[[Insert Provider Response Here]]

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

Section IV.C.3.d 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.

37. As instructed in section IV.C.3.d.(1)(a)(i), if the Company charged Customers more than one Permissible Ancillary Services fee in connection with the same interstate, international, or mixed-jurisdictional transaction during 2022, 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 the Company 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]]

38. As instructed in section IV.C.3.d.(1)(b), explain in detail any differences between the Company’s practices during 2022 regarding the assessment of Ancillary Services fees in connection with

Audio IPCS and the Company's practices during 2022 regarding the assessment of Ancillary Services fees in connection with Video IPCS.

[[Insert Provider Response Here]]

39. As instructed in section IV.C.3.d.(1)(c), explain in detail any differences between the Company's practices during 2022 regarding the assessment of Ancillary Services fees in connection with interstate/international IPCS and the Company's practices during 2022 regarding the assessment of Ancillary Services fees in connection with intrastate IPCS.

[[Insert Provider Response Here]]

40. **Payment Card Processing for Automated Payment Services:** As instructed in section IV.C.3.d.(2)(a)(iii), provide responses to the following information requests related to the Company's Automated Payment Services:

- a. State whether the Company offered payment card processing in connection with Automated Payment Services in 2022 for each of the following services by responding with "Yes" or "No":

Audio IPCS:           [[Insert "Yes" or "No" Here]]          

Video IPCS:           [[Insert "Yes" or "No" Here]]          

IPCS-Related Services:           [[Insert "Yes" or "No" Here]]          

Other Products and Services – Regulated:           [[Insert "Yes" or "No" Here]]          

Other Products and Services – Nonregulated:           [[Insert "Yes" or "No" Here]]          

- b. If you identified any service segments in the previous question with which the Company offered payment card processing services, describe for each service segment the payment card processes that the Company offered as a part of Automated Payment Services for 2022. For example, if the Company offered Customers the option of adding funds to an account by using a payment card, describe the steps that must be completed to add such funds. If the Company offers payment card processing services differently between service segments, describe in detail how the payment card processing service differs for each service segment. If you did not identify any service segments with which the Company offered payment card processing services in the previous question or if the Company did not offer Automated Payment Services of any kind for 2022, please confirm your response in the space below.

[[Insert Provider Response Here]]

- c. If the Company offers payment card processing services differently between Audio IPCS and Video IPCS, describe in detail how the payment card processing service differs for each service segment.

[[Insert Provider Response Here]]

- d. If you indicated that the Company offered payment card processing services in connection with Automated Payment Services, 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]]

- e. Describe in detail how Customers are billed for each payment card processing service in connection with Automated Payment Services across the applicable service segments, including how the transaction amount is calculated and how the Company treats such payments.

[[Insert Provider Response Here]]

- f. If you need to provide an additional explanation to any of your responses related to Automated Payment Services to ensure that your responses are full and complete, please use the space provided below:

[[Insert Provider Response Here]]

**41. Live Agent Services:** As instructed in section IV.C.3.d.(2)(b)(iii), provide responses to the following information requests related to your Live Agent Services:

- a. State whether the Company offered Live Agent Services in 2022 for each of the following services by responding with “Yes” or “No”:

Audio IPCS:           [[Insert “Yes” or “No” Here]]          

Video IPCS:           [[Insert “Yes” or “No” Here]]          

IPCS-Related Services:           [[Insert “Yes” or “No” Here]]          

Other Products and Services – Regulated:           [[Insert “Yes” or “No” Here]]          

Other Products and Services – Nonregulated:           [[Insert “Yes” or “No” Here]]          

- b. If you identified any service segments in the previous question with which the Company offered Live Agent Services, describe the functions or uses of the Company’s Live Agent Services for 2022. For example, if the Company offered Customers the option of adding funds to an account by speaking with a Customer service representative, describe what the Customer service representative will do to complete this task. If you did not identify any service segments with which the Company offered Live Agent Services in the previous question or if the Company did not offer Live Agent Services of any kind for 2022, please confirm your response in the space below.

[[Insert Provider Response Here]]

- c. If the Company’s Live Agent Services differ between Audio IPCS and Video IPCS, describe in detail how these services differ for each service segment.

[[Insert Provider Response Here]]

- d. If you indicated that the Company offered Live Agent Services in 2022, identify whether the Live Agent Service 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]]

e. Describe in detail how Customers are billed when using the Company’s Live Agent Service.

[[Insert Provider Response Here]]

f. If you need to provide an additional explanation to any of your responses related to Live Agent Services to ensure that your responses are full and complete, please use the space provided below:

[[Insert Provider Response Here]]

42. **Paper Bill/Statement Services:** As instructed in section IV.C.3.d.(2)(c)(iii), provide responses to the following information requests related to the Company’s Paper Bill/Statement Services:

a. State whether the Company offered Paper Bill/Statement Services in 2022 for each of the following services by responding with “Yes” or “No”:

Audio IPCS:           [[Insert “Yes” or “No” Here]]          

Video IPCS:           [[Insert “Yes” or “No” Here]]          

IPCS-Related Services:           [[Insert “Yes” or “No” Here]]          

Other Products and Services – Regulated:           [[Insert “Yes” or “No” Here]]          

Other Products and Services – Nonregulated:           [[Insert “Yes” or “No” Here]]          

b. If you identified any service segments in the previous question with which the Company offered Paper Bill/Statement Services, describe how an Incarcerated Person, Customer, or Consumer makes the election to pay for and receive a paper bill or statement, including the typical length of time for delivery by using the Company’s Paper Bill/Statement Services. If you did not identify any service segments with which the Company offered Paper Bill/Statement Services in the previous question or if the Company did not offer Paper Bill/Statement Services of any kind for 2022, please confirm your response in the space below.

[[Insert Provider Response Here]]

c. If the Company’s Paper Bill/Statement Services differ between Audio IPCS and Video IPCS, describe in detail how this service differs for each service segment.

[[Insert Provider Response Here]]

d. If you indicated that the Company offered Paper Bill/Statement Services in 2022, identify whether the Paper Bill/Statement Services 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]]

e. Describe in detail how Customers are billed when using the Company’s Paper Bill/Statement Services.



[[Insert Provider Response Here]]

- f. If you need to provide an additional explanation to any of your responses related to Paper Bill/Statement Services to ensure that your responses are full and complete, please use the space provided below:

[[Insert Provider Response Here]]

**43. Single-Call and Related Services:** As instructed in section IV.C.3.d.(2)(d)(vi), provide responses to the following information requests related to the Company’s Single-Call and Related Services:

- a. State whether the Company offered Single-Call and Related Services in 2022 for each of the following services by responding with “Yes” or “No”:

Audio IPCS: \_\_\_\_\_ [[Insert “Yes” or “No” Here]]

Video IPCS: \_\_\_\_\_ [[Insert “Yes” or “No” Here]]

IPCS-Related Services: \_\_\_\_\_ [[Insert “Yes” or “No” Here]]

Other Products and Services – Regulated: \_\_\_\_\_ [[Insert “Yes” or “No” Here]]

Other Products and Services – Nonregulated: \_\_\_\_\_ [[Insert “Yes” or “No” Here]]

- b. If you identified any service segments in the previous question with which the Company offered Single-Call and Related Services, describe the services an Incarcerated Person, Customer, or Consumer receive when electing to use your Single-Call and Related Services. If you did not identify any service segments with which the Company offered Single-Call and Related Services in the previous question or if the Company did not offer Single-Call and Related Services of any kind for 2022, please confirm your response in the space below.

[[Insert Provider Response Here]]

- c. If the Company’s your Single-Call and Related Services differ between Audio IPCS and Video IPCS, describe in detail how this service differs for each service segment.

[[Insert Provider Response Here]]

- d. If you indicated that the Company offered Single-Call and Related Services in 2022, identify whether the Single-Call and Related Services was performed by the Company, an Affiliate, or a Third Party and provide the amount of such fees charged to Customers during 2022. If provided by an Affiliate or a Third Party, identify the Affiliate or Third Party.

[[Insert Provider Response Here]]

- e. Describe in detail how Customers are billed when using the Company’s Single-Call and Related Services.

[[Insert Provider Response Here]]

- f. If you need to provide an additional explanation to any of your responses related to Single-Call and Related Services to ensure that your responses are full and complete, please use the space provided below:

[[Insert Provider Response Here]]

44. **Third-Party Financial Transaction Services:** As instructed in section IV.C.3.d.(2)(e)(vi), state whether any entity other than the Company charged Customers for Third-Party Financial Transaction Services in connection with the Company's IPCS during 2022. If so, list each such entity and provide the amount of such fees each listed entity charged Customers during 2022.

[[Insert Provider Response Here]]

45. **Third-Party Financial Transaction Services:** As instructed in section IV.C.3.d.(2)(e)(vii), provide responses to the following information requests related to the Company's Third-Party Financial Transaction Services:

- a. State whether the Company offered Third-Party Financial Transaction Services in 2022 for each of the following services by responding with "Yes" or "No":

Audio IPCS:           [[Insert "Yes" or "No" Here]]          

Video IPCS:           [[Insert "Yes" or "No" Here]]          

IPCS-Related Services:           [[Insert "Yes" or "No" Here]]          

Other Products and Services – Regulated:           [[Insert "Yes" or "No" Here]]          

Other Products and Services – Nonregulated:           [[Insert "Yes" or "No" Here]]          

- b. If you identified any service segments in the previous question with which the Company offered Third-Party Financial Transaction Services, describe the services an Incarcerated Person, Customer, or Consumer receive when electing to use your Third-Party Financial Transaction Services. If you did not identify any service segments with which the Company offered Third-Party Financial Transaction Services in the previous question or if the Company did not offer Third-Party Financial Transaction Services of any kind for 2022, please confirm your response in the space below.

[[Insert Provider Response Here]]

- c. If the Company's Third-Party Financial Transaction Services differ between Audio IPCS and Video IPCS, describe in detail how these services differs for each service segment.

[[Insert Provider Response Here]]

- d. If you indicated that the Company offered Third-Party Financial Transaction Services in 2022, for each service identify whether the Third-Party Financial Transaction Services 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]]

- e. Describe in detail how Customers are billed when using the Company's Third-Party Financial Transaction Services.

[[Insert Provider Response Here]]

- f. If you need to provide an additional explanation to any of your responses related to Third-Party Financial Transaction Services to ensure that your responses are full and complete, please use the space provided below:

[[Insert Provider Response Here]]

- g. **Payment Card Processing Revenues from Third-Party Financial Transaction Services:** As instructed in section IV.C.3.d.(3)(e)(i)(aa), describe the payment card processing services from the Company’s Third-Party Financial Transaction Services, 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.

[[Insert Provider Response Here]]

**46. Other Ancillary Services:** As instructed in section IV.C.3.d.(2)(f)(iii), provide responses to the following information requests related to the Company’s Other Ancillary Services:

- a. State whether the Company offered Other Ancillary Services in 2022 for each of the following services by responding with “Yes” or “No”:

Audio IPCS:           [[Insert “Yes” or “No” Here]]          

Video IPCS:           [[Insert “Yes” or “No” Here]]          

IPCS-Related Services:           [[Insert “Yes” or “No” Here]]          

Other Products and Services – Regulated:           [[Insert “Yes” or “No” Here]]          

Other Products and Services – Nonregulated:           [[Insert “Yes” or “No” Here]]          

- b. If you identified any service segments in the previous question with which the Company offered Other Ancillary Services, describe each Other Ancillary Service and explain the function the Other Ancillary Service performs. If you did not identify any service segments with which the Company offered Other Ancillary Services in the previous question or if the Company’s did not offer Other Ancillary Services of any kind for 2022, please confirm your response in the space below.

[[Insert Provider Response Here]]

- c. If any of the Company’s Other Ancillary Services differ between Audio IPCS and Video IPCS, describe in detail how each Other Ancillary Service differs for each service segment.

[[Insert Provider Response Here]]

- d. If you indicated that the Company offered Other Ancillary Services in 2022, for each service, identify whether the Other Ancillary Service 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]]

- e. Describe in detail how Customers are billed when using each of the Company's Other Ancillary Services.

*[[Insert Provider Response Here]]*

- f. If you need to provide an additional explanation to any of your responses related to Other Ancillary Services to ensure that your responses are full and complete, please use the space provided below:

*[[Insert Provider Response Here]]*

- 47. **Payment Card Processing Revenues from Other Ancillary Services:** As instructed in section IV.C.3.d.(3)(h)(i)(aa), describe the payment card processing services from the Company's Other Ancillary Services, 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 during 2022. If so, enter the amount of such fees charged to Customers during 2022.

*[[Insert Provider Response Here]]*

- 48. **Automated Payment Service Revenue-Sharing Agreements:** As instructed in section IV.C.3.d.(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]]*

- 49. **Single-Call and Related Services Revenue-Sharing Agreements:** As instructed in section IV.C.3.d.(3)(d)(i)(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]]*

- 50. **Third-Party Financial Transaction Fee Revenue-Sharing Agreements:** As instructed in section IV.C.3.d.(3)(g)(i), 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]]*

- 51. **Other Ancillary Services Revenue-Sharing Agreements:** As instructed in section IV.C.3.d.(3)(h)(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]]*

52. **Ancillary Services Revenue-Sharing Agreements:** As instructed in section IV.C.3.d.(4) and other instructions directing further responses related to Revenue-Sharing Agreements in response to questions 48, 49, 50, and 51, identify any other Revenue-Sharing Agreements between the Provider and any Affiliate and/or Third Party in connection with any Ancillary Services. 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 Services 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 during 2022;
  - g. The total amount of revenue shared for each Ancillary Services; and
  - h. The effective and termination dates of the agreement.

[[Insert Provider Response Here]]

53. As instructed in section IV.C.3.d.(5), identify and explain in detail all Ancillary Services Charges that the Company charged during 2022 in connection with Video IPCS.

[[Insert Provider Response Here]]

54. As instructed in section IV.C.3.d.(6), identify and explain in detail how the Company's Ancillary Services Charges in connection with Audio IPCS differed from those in connection with Video IPCS.

[[Insert Provider Response Here]]

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

55. As instructed in section IV.C.3.e.(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.f of the Instructions)**

56. **Narrative Description of a Subcontract to Provide ICS:** As instructed in section IV.C.3.f.(2), if a Provider contracts with a Subcontractor to provide any aspect of Audio or Video IPCS, 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 IPCS;
- b. The services provided by the Contractor;
- c. The name of the Subcontractor;
- d. The services provided by the Subcontractor;
- e. The unique identifier and address for the Facility or Facilities at which the Subcontractor provides services under the agreement;

- f. A description of the operations of the Contractor and the Subcontractor related to providing IPCS;
- g. The types of Audio IPCS and Video IPCS billed by the Contractor and the Subcontractor, respectively; and  
A description of any Revenue-Sharing Agreement between the Contractor 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.

- 57. 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]]*

- 58. As instructed in section IV.D.1.a.(9), fully document, explain, and justify all cost assignments, attributions, and allocations and submit additional workpapers developed using Excel worksheets. As part of your explanation, specifically describe each factor you used to perform any attributions or allocations, and explain the process you used to perform each attribution and allocation. Specify, for each cost assignment, attribution, and allocation, whether the relevant cost data were recorded at the Company, contract, or Facility level.

*[[Insert Provider Response Here]]*

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

- 59. 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]]*

- 60. As instructed in section IV.D.1.d.(1), identify any Facilities for which you estimated the number of communications or minutes and explain how you developed these estimates.

*[[Insert Provider Response Here]]*

61. As instructed in section IV.D.1.d.(1), 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 General Information (Section IV.D.2.a of the Instructions)

62. As instructed in section IV.D.2.a.(11), list each of the types of Video IPCS that the Company provided during 2022 from your response to question 2(b) above. Then, identify the Facilities at which the Company provided each listed type of Video IPCS by using the same unique contract identifiers and unique Facility identifiers used to report data on the Facility-specific Excel template worksheets.

[[Insert Provider Response Here]]

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

63. **Site Commissions:** As instructed in section IV.D.2.b.(1)(d), identify any Site Commissions paid by the Company during 2022 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 the Company paid the Site Commissions, and the amount of the monetary payment, and describe in detail the in-kind payment, including any Safety and Security Measures.

[[Insert Provider Response Here]]

64. As instructed in section IV.D.2.b.(1)(e), list each entity to which the Company paid a Site Commission during 2022. Provide the name of each 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]]

65. **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]]

66. **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 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]]

67. **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]]

68. **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., if a minimum guaranteed amount 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]]

69. **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 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]]

70. **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., if a minimum guaranteed amount 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]]

71. **Site Commissions Allocation Methodology:** As instructed in section IV.D.2.b.(4), fully describe, document, explain, and justify the methodology you used to allocate Site Commission payments between IPCS (and associated Ancillary Services) and Other Products and Services at each Facility during 2022 in situations where the Company made Site Commission payments for both IPCS and Other Products and Services.

[[Insert Provider Response Here]]

72. As instructed in section IV.D.2.b.(5), identify any Facility for which you used different formulas to calculate the Site Commissions paid during 2022 for interstate IPCS, international IPCS, or intrastate IPCS, respectively. For each such Facility, identify separately the amount of Site Commissions paid for interstate IPCS, international IPCS, and intrastate IPCS.

[[Insert Provider Response Here]]

73. As instructed in section IV.D.2.b.(6), identify any Facility for which you used different formulas to calculate the Site Commissions paid during 2022 for Audio IPCS and Video IPCS, respectively. For each such Facility, identify separately the amount of Site Commissions paid for Audio IPCS and Video IPCS.



[[Insert Provider Response Here]]

## Costs of Providers' Safety and Security Measures (Section IV.D.2.c. of the Instructions)

74. As instructed in section IV.D.2.c., list each of the individual Safety and Security Measures under each of the same categories as reported in response to questions 28, 29, 30, 31, 32, 33, and 34, above :

- (i) CALEA compliance measures;
- (ii) Law enforcement support services;
- (iii) Communication security services;
- (iv) Communication recording services;
- (v) Communication monitoring services;
- (vi) Voice biometric services; and
- (vii) Other Safety and Security Measures.

Then, for each listed Safety and Security Measure, identify the Facilities at which the Company provided these measures during 2022 by using the same unique contract identifiers and unique Facility identifiers used to report data on the Facility-specific Excel template worksheets.

## Safety and Security Measures Costs Incurred by Facilities; Other Costs Incurred by Facilities (Section IV.D.2.d of the Instructions)

75. As instructed in section IV.D.2.d.(4), fully document, explain, and justify the accuracy and reliability of any data you have provided in response to questions IV.D.2.d.(1), IV.D.2.d.(2), and IV.D.2.d.(3). The Company shall also retain any documentation supporting any data provided in connection with questions IV.D.2.d.(1), IV.D.2.d.(2), and IV.D.2.d.(3).

[[Insert Provider Response Here]]

76. As instructed in section IV.D.2.d.(5), state whether the Company has any verifiable, reliable, and accurate information regarding any expenses for IPCS and associated Ancillary Services, other than Safety and Security Measure expenses, incurred by Facilities served by the Company during 2022. If the Company has such information, explain in detail the source of the information, the products and services for which the expenses were incurred, including a description of the expenses and the Facility to which that information pertains. The Company must be able to reproduce, on request, documentation sufficient to fully explain and justify the accuracy and reliability of any data reported in response to this inquiry.

[[Insert Provider Response Here]]

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

77. **Automated Payment Fees and Third-Party Transaction Fees Charged in the Same Transaction:** As instructed in section IV.D.2.e.(5) and for each Facility for 2022, 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]]

78. As instructed in section IV.D.2.e.(33), identify any Facilities at which the Company assessed both Ancillary Services Charges and any other charges in connection with video services. For each Facility, list and describe each Ancillary Services Charge the Company assessed during 2022 for video services. Separately, for each Facility, list and describe any other charges that are not Ancillary Services Charges the Company assessed for Video IPCS during 2022.

[[Insert Provider Response Here]]

## **Additional Provider Explanatory Responses**

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

80. [[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 2303(a) (consisting of Word and Excel Templates) will take 260 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 2022, 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-PPM, Washington, DC 20554, Paperwork Reduction Project (3060-1314). We will also accept your comments via the Internet if you send them to 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 3060-1314.

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