

July 30, 2020

**VIA OVERNIGHT DELIVERY**

Nebraska Public Service Commission  
300 The Atrium  
1200 N Street  
Lincoln, Nebraska 68509

Re: In the Matter of the Nebraska Public Service Commission, on its own motion, to consider revisions to the contribution methodology and determine a rate design for services currently subject to a revenues-based surcharge.  
Application No. NUSF-119/PI-233

Dear Commissioners,

Enclosed for filing are one original and five (5) copies of Comments from Securus Technologies, LLC ("Securus") in response to the Nebraska Public Service Commission Order Opening Docket and Seeking Comment dated June 30, 2020 under Application No. NUSF-119/PI-233.

Securus sincerely appreciates your attention to this matter. Should you have any questions or comments regarding this filing, please contact the undersigned at (972) 277-0565 or [mlozich@securustechnologies.com](mailto:mlozich@securustechnologies.com). You may also contact Debbie Conde, Sr. Regulatory Analyst at (972) 277-0395 or [dconde@securustechnologies.com](mailto:dconde@securustechnologies.com).

Respectfully submitted,



**Michael S. J. Lozich**

Sr. Corporate Counsel & Director of Regulatory and Governmental Affairs

**BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION**

<b>In the Matter of the Nebraska Public Service</b>	) Application No. NUSF-119/PI-233
<b>Commission, on its own motion, to consider</b>	)
<b>revisions to the contribution methodology and</b>	)
<b>determine a rate design for services currently</b>	)
<b>subject to a revenues-based surcharge.</b>	)

**COMMENTS OF SECURUS TECHNOLOGIES, LLC**

Securus Technologies, LLC (“Securus”) hereby submits its comments to the Nebraska Public Service Commission (the “Commission”) Order Opening Docket and Seeking Comment entered June 30, 2020, opening this proceeding to determine whether to extend the Nebraska Universal Service Fund (“NUSF”) contribution mechanism of a connections-based surcharge to business and government services, as well as other services currently subject to a revenues-based surcharge; and, if adopted, how a connections-based surcharge should be applied.

On December 19, 2017, the Commission opened NUSF-111/PI-211 to determine the appropriate rate design, data sources, and implementation schedule. On August 7, 2018, the Commission adopted a connections-based surcharge for residential service and found a revenues-based surcharge should continue to apply to business and government, toll, operator, local private line, special access, prepaid wireless, and radio paging services at the surcharge rate of 6.95 percent. This connections-based mechanism for residential service was implemented on April 1, 2019.

Securus initially filed comments on January 30, 2018 in the NUSF-111/PI-211 as a contributing provider to the NUSF, explaining why our company could not apply a connections-based contribution mechanism. As an Institutional Operator Service provider, Securus is uncertain whether questions proposed in this new proceeding will impact our ability to continue contributing through a revenues-based surcharge. Therefore, Securus provides the following comments for the record to explain our earlier position to allow a revenues-based surcharge to continue for operator services.

Securus is an Institutional Operator Service provider and as such, does not have “voice-enabled telephone access lines.” Securus does not have “dial tone lines, or its functional equivalent, that provides local exchange service.” Securus’ services are limited to providing institutional operator services in correctional institutions. Securus provides services using Internet protocol-enabled (“IP-Enabled”) transport facilities, which only have Internet access data connections at the correctional facilities. There are no dedicated local exchange access lines or individual dedicated Internet connections, and neither inmates nor the parties receiving calls from inmates subscribe to access lines from Securus. Securus’ inmate calling services are provided and billed on a call-by-call basis, as with most other operator services.

For the above stated reasons, Securus does not have the ability to determine or charge the NUSF applying a connections-based methodology. Securus is able to apply the USF on the current NUSF revenues-based assessment. As explained above, Securus charges for its service on a “per call” basis. Securus does not provide access lines nor does it charge customers on an access line or connection basis. Securus respectfully requests the Commission to either (a) allow Securus as an Institutional Operator Service provider to continue to be subject to a revenues-based surcharge, (b) provide an alternative method of applying the NUSF for those companies that do not provide services on a connection or access line basis, or (c) exempt those companies from accessing and paying into the NUSF.

Dated July 31, 2020

Respectfully submitted,



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