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FLORIDA PUBLIC
SERVICE COMMISSION

Global Tel*Link
2609 Cameron Street
Mobile, AL 36607
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MAIL ROOM

July 22, 1999

Ms. Blanca Bayo, Director
Division of Records and Reporting
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

990954-TC

Dear Ms. Bayo,

Enclosed for filing on behalf of Global Tel*Link Corporation are an original and fifteen copies of Global's Petition For Waiver Of Rule.

Please acknowledge receipt of these documents by "file" stamping the extra copy of this letter and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,

Jennifer Clark
Regulatory Analyst to
Global Tel*Link Corporation

DOCUMENT NUMBER-DATE
08723 JUL 23 99
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ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Global Tel*Link §
Corporation for Waiver of Florida § Docket No.
Administrative Code, §25-24.920 § Filed: July 22, 1999

PETITION FOR WAIVER OF RULE

COMES NOW, Global Tel*Link Corporation ("Global"), pursuant to Rules 25-24.505(3) and 28-104.002, Florida Administrative Code, and Sections 120.542 and 364.337(4), Florida Statutes, and files this Petition For Waiver with the Florida Public Service Commission ("Commission") for exemption from the requirement of Rule 25-24.920(1)(b), (3)(a), (b), and (c), and (4) requiring customer service provisions to pre-paid calling.

1. Petitioner's name and address are:

Global Tel*Link Corporation
2609 Cameron Street
Mobile, Alabama 36607

2. All notices, Orders or documents regarding this Petition should be directed to:

Jennifer Clark
Regulatory Analyst
2609 Cameron Street
Mobile, Alabama 36607
800/489-4500, ext 2275
334/473-4588 (facsimile)

3. Global is certificated by the Commission to provide both pay telephone service and intrastate interexchange service pursuant to Certificate Numbers 3878 and 3972. Rule 25-24-920, written under the authority of Florida Statutes, 350.127(2), is the subject of this Petition and reads in pertinent part:

- (1) The following information shall be legibly printed on the [pre-paid calling] card:

DOCUMENT NUMBER-DATE

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(b) Toll-free customer service number.

(3) Each company shall provide through its customer service number the following information:

- (a) Certificate number;
- (b) Rates and surcharges;
- (c) Balance of use in account; and

(4) Each company shall provide a live operator to answer incoming calls 24 hours a day, 7 days a week, or shall electronically voice record end user complaints. A combination of live operators or recorders may be used.

4. Global contracts with confinement facilities to provide pay telephone services to prisoners within the state of Florida which currently permit inmates to place outbound, collect-only calls. Global is in the process of implementing the "inmate debit card" program as an additional option to incarcerated individuals. This program will allow inmates the option of purchasing from the facility's commissary, a debit card to make phone calls, in addition to his/her 0+ collect option. This program is highly favored by facility administration, eliminates bad debt and relieves the financial burden of private individuals' acceptance of collect calls. To perfect a debit calling program in the corrections environment, Global respectfully requests waiver of Rule 25-24.920 (1)(b), (3)(a-c), and (4).

5. To implement this program, Global requests exemption from Rule 25-24.920(1)(b), requiring service providers to furnish a toll-free customer service number. Inmates are not allowed access to live operator options, including 800 service, for security reasons. Correctional facilities must avoid, to the extent possible, fraud, threats and potentially volatile circumstances which may arise from such access. The facility administration sits in the best position to serve the customer service function, in its technical sense, because only they are allowed direct contact with the inmate. Because

Global is not allowed the necessary access to its end user to serve the customer as these Rules are written, it respectfully requests waiver. In satisfaction of the rudimentary purpose, administrators will have access to Global's customer service line twenty-four hours a day, seven days per week providing for timely resolution of all inmate related debit card matters arising within the facility.

6. Similarly, Global requests waiver of § 25-24.920(3)(a-c) requiring the availability of the provider's, (a) Certificate number, (b) rates and surcharges, and (c) balance of use in account, through toll-free customer service access.

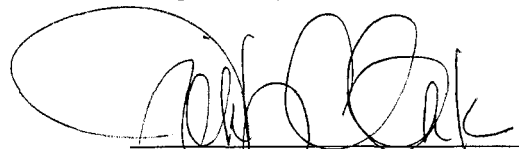
7. Global is prohibited by the facility from allowing inmates access to any calling options, other than 0+ collect, in light of the security issues outlined above. To satisfy the mandates of subsections of (a) and (b), Global proposes to render its Certificate number, rates and surcharges to the facility who may pass the information on at its discretion. With respect to subsection (c), Global will offer an "IVR" system allowing inmates direct access to his/her remaining account balance through an automated audible database. We expect to have this system in place in approximately 180 days. During the interim, Global will forward to each facility the account balances of each active card according to PIN number, on a daily basis. The format will be simple and user friendly yielding immediate access to card balances upon inmate inquiry. Thus, Global proposes this daily record to satisfy the underlying purpose of §25-24.920(3)(c).

8. Global also requests exemption from §25-24.920(4) requiring a twenty-four hour method of recording end user complaints. Global requests waiver to the extent that the facility administration receive complaints directly from the inmate. The facility then, has direct access to Global's customer service for prompt matter resolution. To reiterate,

inmates are not allowed access to live operators to ensure prison security. Global submits that this Rule will be ultimately satisfied because inmates have access to administrators at all times, who, in turn, have access to Global's customer service at all times. Global proposes that the facility deal directly with the inmates concerning debit card complaints, and Global will deal directly with the facility on an account specific basis. This plan should result in an appropriately administered debit program beneficial to both the inmates and the facility, incorporating timely resolution of all matters, concerns or complaints arising therefrom.

9. In summary, Global proposes an inmate debit calling program that will benefit the correctional facility, its inmates and their families. Moreover, Global has in place proposed methods of satisfying each rule from which it requests exemption. For the foregoing reasons, Global respectfully requests waiver of Florida Administrative Code, §§25-24-920(1)(b), (3)(a-c), and (4).

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Jennifer Clark', written over a horizontal line.

Jennifer Clark
Regulatory Analyst to
Global Tel*Link Corporation
2609 Cameron Street
Mobile, Alabama 36607
334/479-4500
334/473-4588 (facsimile)

STATE OF FLORIDA

Commissioners:
JOE GARCIA, CHAIRMAN
J. TERRY DEASON
SUSAN F. CLARK
JULIA L. JOHNSON
E. LEON JACOBS, JR.



DIVISION OF RECORDS & REPORTING
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770

Public Service Commission

July 26, 1999

Jennifer Clark, Regulatory Analyst
Global Tel*Link Corporation
2609 Cameron Street
Mobile, Alabama 36607

Re: Docket No. 990954-TC

Dear Ms. Clark:

This will acknowledge receipt of a petition for waiver of Rule 25-24.920(1)(b), (3)(a),(b), and (c), and (4), F.A.C., which requires customer service provisions to pre-paid calling, by Global Tel*Link Corporation, which was filed by this office on July 23, 1999 and assigned the above-referenced docket number. Appropriate staff members will be advised.

Mediation may be available to resolve any dispute in this docket. If mediation is conducted, it does not affect a substantially interested person's right to an administrative hearing. For more information, contact the Office of General Counsel at (850) 413-6078 or FAX (850) 413-6079.

Division of Records and Reporting
Florida Public Service Commission