

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**In the Matter of the Application of  
CenturyLink Public Communications, Inc.  
for an Amended Certificate of Authority to  
Provide Alternative Operator Services  
within the State of South Dakota**

**Docket No. \_\_\_\_\_**

**APPLICATION FOR AN AMENDED CERTIFICATE OF AUTHORITY  
TO PROVIDE ALTERNATIVE OPERATOR SERVICES**

Pursuant to South Dakota Code 49-31-3 and ARDS 20:10:24:02 and 20:10:24:05, CenturyLink Public Communications, Inc. d/b/a CenturyLink ("CPCI") applies for an amended certificate of authority authorizing it to provide alternative operator services within the state of South Dakota.

CPCI is in the business of providing payphone services and inmate calling services in various states throughout the United States. CPCI currently holds a certificate of authority to provide service as an interexchange carrier in South Dakota and intends to bid on contracts with correctional facilities in South Dakota to provide inmate calling services including alternative operator services. The following information is furnished in support of this application:

**1. Applicant's name, address, telephone number, facsimile number, web page URL and email address:**

CenturyLink Public Communications, Inc.  
100 CenturyLink Drive  
Monroe, LA 71203  
Telephone Number: (877) 904-7774  
Facsimile Number: (877) 800-2737  
Web Page: [www.centurylink.com/corrections](http://www.centurylink.com/corrections)  
Email address: [payphones@CenturyLink.com](mailto:payphones@CenturyLink.com)

**2. A description of the legal and organizational structure of the applicant's company:**

CenturyLink Public Communications, Inc. is a Florida corporation. It is a wholly-owned direct subsidiary of Embarq Corporation, which in turn is a wholly-owned direct subsidiary of CenturyLink, Inc.

**3. The name under which the applicant will provide interexchange services if different than in subdivision (1) of this section:**

CPCI will provide inmate calling services including operator services under the assumed name "CenturyLink."

**4. A copy of the applicant's certificate of authority to transact business in South Dakota from the Secretary of State:**

A copy of CPCI's certificate of authority to transact business in South Dakota from the Secretary of State is attached as Exhibit A.

**5. The location of the applicant's principle office, if any, in this state and the name and address of its current registered agent, if applicable:**

CPCI does not presently maintain an office in the state of South Dakota. The name and address of its current registered agent is:

CT Corporation System  
319 S. Coteau St.  
Pierre, SD 57501

**6. A list and specific description of the telecommunications services the applicant intends to offer:**

CPCI intends to provide secure, monitored telecommunications services that allow inmates located in correctional institutions within the state of South Dakota to contact friends

and family located in or out of South Dakota. Its services will be designed and provisioned on an individual case basis pursuant to contracts with its jail and correctional institution customers. The types of calls that inmates may be permitted to make, depending on the correctional facility, include debit, prepaid collect and traditional collect calls. For security reasons, only outbound automated-operator assisted collect calls may be allowed in its provision of pay telephone services to correctional facilities.

**7. A detailed statement of how the applicant will provide its services:**

CPCI intends to provide inmate calling services using coinless or coin pay telephone equipment that will be deployed at correctional facilities at various locations throughout the state of South Dakota. CPCI will contract with local exchange carriers to enable outbound calls, which will be routed to call processing centers in either Atlanta or San Antonio, where the calls will be processed and routed to their ultimate destinations.

**8. A service area map or narrative description indicating with particularity the geographic area proposed to be served by the applicant:**

CPCI will provide service to jails and correctional facilities within South Dakota. The precise locations will depend upon where the correctional facilities who select CPCI as their provider are located.

**9. For the most recent 12 month period, financial statements of the applicant including a balance sheet, income statement, and cash flow statement. The applicant shall provide audited financial statements, if available:**

The 10K and annual report of CenturyLink's parent corporation, CenturyLink, Inc. can be found at: <http://ir.centurylink.com/docs.aspx?iid=4057179>.

**10. The names, addresses, telephone number, facsimile number, E-mail address, and toll free number of the applicant's representatives to whom all inquiries must be made regarding complaints and regulatory matters and a description of how the applicant handles customer service matters:**

CPCI's unique product demands customer service operations in support of three separate customer groups: correctional facilities, inmates, and called parties (friends, families, attorneys, bondsmen).

For correctional facilities and their inmates, CPCI provides a primary program manager responsible for monitoring all facility operations. This program manager has a designated backup. Together, they are measured and managed to quality standards for maintaining proper operation of the call control system as well as time to clear prioritized issues. These issues include inmate complaints (e.g. inmate prepaid account balances, call quality, PIN resets) and facility technical issues (e.g. network outages, phones out of service, investigative feature assistance). For facility technical issues, CPCI also provides correctional staff with a 24/7/365 technical assistance center accessible by toll-free telephone number or email.

Inquiries regarding complaints and regulatory matters may be made to:

CenturyLink Public Communications, Inc.  
100 CenturyLink Dr.  
Monroe, LA 71203  
Toll Free Phone: (877) 904-7774  
Toll Free Fax: (877) 800-2737  
[Payphones@CenturyLink.com](mailto:Payphones@CenturyLink.com)

CPCI's lead point of contact regarding regulatory matters is:

Jennifer Roubique  
CenturyLink Public Communications, Inc.  
100 CenturyLink Drive  
Monroe, LA 71203  
Tel: (318) 330-6129  
Fax: (318) 340-5381  
Email: [Jennifer.Roubique@CenturyLink.com](mailto:Jennifer.Roubique@CenturyLink.com)

**11. Information concerning how the applicant plans to bill and collect charges from customers:**

CPCI contracts with Inmate Calling Solutions, LLC, for debit and prepaid calls, and ILD Telecommunications, Inc., for collect calls, to handle the billing and collection of charges from inmates who place calls. The precise details for the billing and collection of charges from inmates depend upon the correctional facility at issue. However, for debit and prepaid calls, inmates and/or their families must arrange to fund a debit or prepaid account from which payment is drawn. For collect calls, the called party must authorize payment for the call.

**12. Information concerning the applicant's policies relating to solicitation of new customers and a description of the efforts the applicant shall use to prevent the unauthorized switching of interexchange customers:**

CPCI bids on contracts from correctional facilities, typically through structured procurements. Generally, if CPCI wins the bid a contract setting forth the terms and conditions of service will be entered into with the correctional facility. In the inmate calling service business, there is generally only one provider of inmate calling services at a particular facility for security reasons. Consequently, the issue of unauthorized switching of interexchange customers does not arise.

**13. Information concerning how the applicant will make available to any person information concerning the applicant's current rates, terms, and conditions for all of its telecommunications services:**

CPCI posts information concerning its rates, terms and conditions for service on its website.

**14. Information concerning how the applicant will notify a customer of any materially adverse change to any rate, term, or condition of any telecommunications service being provided to the customer. The notification must be made at least thirty days in advance of the change:**

Generally, changes to the rates, terms or conditions of service at correctional facilities can only be made pursuant to contract amendments with the correctional facility at issue.

The correctional facility at issue in turn notifies its inmates of any changes in rates, terms or conditions.

**15. A list of the states in which the applicant is registered or certified to provide telecommunications services, whether the applicant has ever been denied registration or certification in any state and the reasons for any such denial, a statement as to whether or not the applicant is in good standing with the appropriate regulatory agency in the states where it is registered or certified, and a detailed explanation of why the applicant is not in good standing in a given state, if applicable:**

CPCI is presently certified or registered to provide telecommunications services in Alabama, Arizona, Arkansas, California, Florida, Georgia, Kentucky, Louisiana, Minnesota, Missouri, Nevada, North Carolina, Oklahoma, Oregon, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, Washington and Wyoming. In addition, CPCI has a pending application for certification in West Virginia. CPCI has never been denied registration/certification and is in good standing in each of the jurisdictions where it maintains a certificate/registration.

**16. A description of how the applicant intends to market its services, its target market, whether the applicant engages in any multilevel marketing, and copies of any company brochures used to assist in the sale of services:**

CPCI markets its services by responding to bid requests from jails and correctional facilities. CPCI generally does not use company brochures to assist in this process.

**17. Federal tax identification number and South Dakota sales tax number:**

CPCI's Federal Tax identification number is 59-3268090.

CPCI's South Dakota sales tax number is 1973504007.

**18. The number and nature of complaints filed against the applicant with any state or federal regulatory commission regarding the unauthorized switching of a customer's telecommunications provider and the act of charging customers for services that have not been ordered:**

CPCI has not had any complaints filed against it with any state or federal regulatory commission regarding the unauthorized switching of a customer's telecommunications provider or the act of charging customers for services that have not been ordered.

**19. A written request for waiver of those rules the applicant believes to be inapplicable:**

CPCI requests a waiver of ARSD 20:10:24:05(3), (4)(c), (4)(d), (5), (6), (7) and (11) for the provision of alternative operator services to inmate customers in correctional facilities on the grounds that these requirements are not appropriate in the context of inmate calling services. The Commission waived each of these requirements in its decision granting a Certificate of Authority to Pay Tel Communications, Inc. for the provision of inmate calling services including alternative operator services. *In the Matter of the Application of Pay Tel*

*Communications, Inc. For a Certificate of Authority to Provide Alternative Operator Services in South Dakota*, 2010 S.D. PUC LEXIS 137 (August 25, 2010).

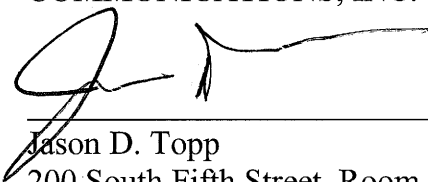
- 20. Other information requested by the commission needed to determine that the applicant has sufficient technical, financial, and managerial capabilities to provide the interexchange services it intends to offer consistent with the requirements of this chapter and other applicable rules and laws:**

N/A

WHEREFORE, CenturyLink Public Communications, Inc., requests that the South Dakota Public Utilities Commission enter an order granting this Application, and such other relief as may be just and proper.

Dated this 21st day of May, 2014.

CENTURYLINK PUBLIC  
COMMUNICATIONS, INC.



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