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Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, MA 02118-6500

RE: COLLECT CALL BILLING RATES: GLOBAL TEL-LINK AND SECURUS

To Whom It May Concern:

I write in support of the request to lower collect call billing rates. Our firm represents primarily indigent criminal defendants in state and federal courts in Massachusetts.

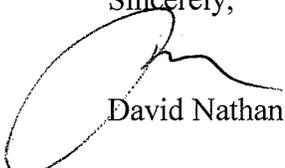
First, the rates are unreasonably high, nearing \$2 for a six minute call. Second, in the case of calls from indigent clients these unreasonably high charges represent a direct transfer of money intended for indigent criminal defense into the hands of a private corporation. Specifically, the Committee for Public Counsel Services reimburses private court-appointed counsel for the cost of each call.

Third, the service is not good. In the case of Global Tel-Link, we often have dropped calls and calls that fail to connect. In the case of Securus, they are difficult to deal with and try to demand payment in advance for attorney-client calls. Only the most steadfast can push past their layers of uninformed or misleading employees to establish an attorney account that does not require pre-payment. It is clear that there is a strategy of trying to steer attorneys away from this option and instead force them into a pre-paid account.

Fourth, neither provider provides an announcement that allows an attorney to determine whether the call is an unmonitored confidential attorney-client call or whether it is a regular monitored call. The announcement simply says that calls "may be monitored" except for attorney-client calls. Where the attorney numbers are placed on a special pin, there should be no problem providing such an announcement. Where many of our clients are mentally ill, very young, developmentally disabled or unsophisticated, we should not have to simply trust that our clients have entered the correct PIN or added our number to the attorney PIN list.

Thank you for your consideration of these comments.

Sincerely,


David Nathanson

