



# PUBLIC NOTICE

Federal Communications Commission  
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## SECTION 214 APPLICATIONS GRANTED

WC Docket Nos. 20-207, 20-218

By this Public Notice, the Wireline Competition Bureau and the International Bureau (Bureaus) grant the following applications pursuant to section 214 of the Communications Act of 1934, as amended (Act), and sections 63.03-04, 63.18, and 63.24 of the Commission's rules.<sup>1</sup> The Bureaus received no comments or petitions in opposition to grant of these applications.

**Section 214 Applications Filed for Consent to Transfer Contracts of Legacy Long Distance International, Inc. d/b/a Legacy Inmate Communications to Network Communications International Corp. d/b/a NCIC Inmate Communications, WC Docket 20-207, ITC-ASG-20200609-00101 (filed June 29, 2020).** On August 27, 2020, the Bureaus released a Public Notice<sup>2</sup> seeking comment on an application filed by Legacy Long Distance International, Inc. d/b/a Legacy Inmate Communications (Legacy) and Network Communications International Corp. d/b/a NCIC Inmate Communications (NCIC) requesting approval for Legacy to transfer certain correctional facility contracts to NCIC.<sup>3</sup> NCIC is a Texas S corporation that holds authorizations from the Commission to provide domestic and international telecommunications services.<sup>4</sup> Applicants state that NCIC specializes in the provision of inmate communications services to correctional facilities with customers in all 50 states and Puerto Rico.<sup>5</sup> NCIC's services include operator services, debit, and prepaid calling services.<sup>6</sup>

Applicants state that Legacy is exiting the inmate calling services industry and that the proposed transaction is part of its effort to ensure a smooth transition of existing inmate calling services customers

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<sup>1</sup> 47 U.S.C. § 214; 47 CFR §§ 63.03-04, 63.18, 63.24.

<sup>2</sup> *Acquisition of Certain Assets of Legacy Long Distance International, Inc. d/b/a Legacy Inmate Communications by Network Communications International Corp. d/b/a NCIC Inmate Communications*, WC Docket 20-207, Public Notice, 35 FCC Rcd 9945 (2020).

<sup>3</sup> Joint Application of Legacy Long Distance International, Inc. d/b/a Legacy Inmate Communications and Network Communications International Corp. d/b/a NCIC Inmate Communications for Consent To Transfer Contracts of Legacy Long Distance International, Inc. Pursuant to Section 214 of the Communications Act of 1934, As Amended, WC Docket No. 20-207, ITC-ASG-20200609-0010, at 1-2 (filed June 29, 2020) (NCIC Application). Applicants filed a supplement to their application on July 30, 2020. Letter from Sharon R. Warren, Consultant, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 20-207 (filed July 30, 2020) (NCIC July 30 Supplement Letter). Applicants filed a further supplement to their application on October 9, 2020. Letter from Brian Hill, Chief Executive Officer, Legacy, and Bill Pope, President, NCIC, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 20-207 (filed October 9, 2020) (NCIC October 9 Supplement Letter).

<sup>4</sup> NCIC Application at 3.

<sup>5</sup> *Id.* at 2.

<sup>6</sup> *Id.*

to new providers.<sup>7</sup> Pursuant to the terms of the proposed transaction, Legacy will transfer 65 correctional facility contracts to NCIC.<sup>8</sup> These contracts are for services provided to jails and do not include prison contracts.<sup>9</sup> Applicants state that, after the consummation of the proposed transaction, NCIC will provide inmate calling services to the incarcerated individuals within the correctional facilities at “existing or lower rates under the Correctional Facility Customer contracts to be transferred subject to federal and state regulations, and applicable contract terms and conditions.”<sup>10</sup>

**Section 214 Applications Filed for the Transfer of Control of Certain Assets of Legacy to Global Tel\*Link Corporation, WC Docket 20-218, ITC-ASG-2020008-00112 (filed July 8, 2020).** On August 27, 2020, the Bureaus released a Public Notice<sup>11</sup> seeking comment on an application filed by Legacy and Global Tel\*Link Corporation (GTL) requesting approval for Legacy to transfer certain correctional facility contracts from Legacy to GTL.<sup>12</sup> Legacy is a wholly owned subsidiary of Jail Education Solutions, Inc. d/b/a Edovo and holds authorizations from the Commission to provide domestic and international telecommunications services.<sup>13</sup> Applicants state that Legacy provides inmate communications services including inmate calling services and investigative technology to hundreds of correctional institutions nationwide.<sup>14</sup>

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<sup>7</sup> NCIC October 9 Supplement Letter at 1-2; *see also* Application of Legacy Long Distance International, Inc. for Authority Pursuant to Section 214 of the Communications Act of 1934, As Amended, To Discontinue the Provision of Service, WC Docket 20-52, at 1-2 (filed Feb. 18, 2020) (Legacy Discontinuance Application); *Comments Invited on Section 214 Application(s) to Discontinue Domestic Non-Dominant Carrier Telecommunications and/or Interconnected VoIP Services*, WC Docket Nos. 20-52, 20-59, and 20-77, Public Notice, DA 20-274, 35 FCC Rcd 2090, 2091 (WCB March 13, 2020), (Legacy Discontinuance Grant Public Notice).

<sup>8</sup> *See* Letter from Sharon R. Warren, Consultant, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 20-207, at Exh. A (Account List) (filed Aug. 25, 2020) (August 25 Supplement Letter); Letter from Sharon R. Warren, Consultant, to Marlene H. Dortch, Secretary, FCC, WC Docket 20-207, at Exh. A (Account List) (filed Oct. 13, 2020) (updating the list of correctional facilities to be transferred to exclude Doña Ana County, New Mexico). The facility customer contracts to be transferred from Legacy to NCIC are listed in Attachment A.

<sup>9</sup> NCIC July 30 Supplement Letter at 1.

<sup>10</sup> NCIC October 9 Supplement Letter at 3. NCIC states that it “will make any necessary revisions to its interstate/international web-posted rates, terms, and conditions for ICS and ancillary service charges to incorporate the Legacy existing Correctional Facility Customer contract rates as necessary.” *Id.*

<sup>11</sup> *Acquisition of Certain Assets of Legacy Long Distance International, Inc. d/b/a Legacy Inmate Communications by Global Tel\*Link Corporation*, WC Docket 20-218, Public Notice, 35 FCC Rcd 9940 (2020).

<sup>12</sup> Joint Application of Legacy Long Distance International, Inc. d/b/a Legacy Inmate Communications and Global Tel\*Link Corporation for Consent to Transfer Control of Control of Certain Assets Pursuant to Section 214 of the Communications Act of 1934, as Amended, WC Docket No. 20-218, ITC-ASG-20200708-00112, at 1, 4 (filed July 8, 2020) (GTL Application). Applicants filed a supplement to their application on September 21, 2020, updating the list of correctional facility customers to be transferred to GTL to include Doña Ana County, New Mexico. Letter from Chérie R. Kiser and Angela F. Collins, Counsel for Global Tel\*Link Corporation, to Marlene H. Dortch, Secretary, FCC, WC Docket 20-218, at 1 (filed Sept. 21, 2020) (GTL September 21 Supplement Letter). Applicants filed a further supplement to their application on October 9, 2020. Letter from Brian Hill, Chief Executive Officer, Legacy, and Matthew Caesar, Executive Vice President, Global Tel\*Link Corporation, to Marlene H. Dortch, Secretary, FCC, WC Docket 20-218 (filed Oct. 9, 2020) (GTL October 9 Supplement Letter).

<sup>13</sup> GTL Application at 2. The proposed transaction does not include transferring these authorizations from Legacy to GTL. *Id.* at 1.

<sup>14</sup> *Id.* at 2.

GTL is a wholly owned subsidiary of GTEL Holdings, Inc.<sup>15</sup> and holds authorizations from the Commission to provide interstate and international telecommunications services.<sup>16</sup> GTL and its wholly owned subsidiaries offer or are certified to offer telecommunications services, interexchange services, payphone services, operator services, or inmate calling services in Puerto Rico, the District of Columbia, and all fifty (50) states with the exception of Alaska.<sup>17</sup> Applicants state that GTL specializes in the provision of managed inmate communications services, including inmate calling services.<sup>18</sup>

Applicants state that the proposed transaction is part of Legacy's plan to exit the inmate calling services marketplace.<sup>19</sup> Pursuant to the terms of the proposed transaction, Legacy will transfer 14 inmate communications service contracts with correctional facilities located in California, Florida, Illinois, Maine, Maryland, New Mexico, Oregon, and Washington to GTL.<sup>20</sup> Applicants state that GTL will thereafter provide inmate calling services and ancillary services to the transferred correctional facility customers and the incarcerated individuals in those facilities "at the existing rates under the Correctional Facility Customer contracts to be transferred subject to federal and state regulations, and applicable contract terms and conditions."<sup>21</sup>

### **Discussion**

We find, upon consideration of the record, that the proposed transactions will serve the public interest, convenience, and necessity. Although the Commission has found that the potential for public interest harm is unlikely in transactions involving non-dominant carriers providing resold or facilities-based interstate, interexchange services,<sup>22</sup> the Applicants in these transactions provide their interstate, interexchange telecommunications services in the inmate calling services industry. The Commission has historically recognized that the inmate calling services marketplace is different from other telecommunications marketplaces.<sup>23</sup> In light of this difference, we have carefully considered these

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<sup>15</sup> GTL Application at 7. GTEL Holdings, Inc. is indirectly held by ASP GTEL Investco, LP (ASP Investco), a Delaware limited liability company (96% equity interest). American Securities Partners VI, LP (ASP VI), a Delaware limited partnership, owns approximately 98% of ASP Investco. No limited partner in ASP VI owns a 10% or greater interest in ASP VI. The general partner of ASP VI is American Securities Associates VI, LLC (ASA), a Delaware limited liability company. *Id.* at 7-8. ASP VI is a private equity fund managed by American Securities LLC (AmSec), a New York limited liability company. Applicants state that AmSec does not have any ownership interest or day-to-day management role in GTL or ASP VI. Letter from Cherie R. Kiser and Angela F. Collins, Counsel for GTL, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 20-218, at 1 (filed July 30, 2020) (GTL July 30 Supplement Letter). The following individuals, all U.S. citizens, hold a 10% or greater ownership interest in ASA: Michael G. Fisch, Paul Rossetti, David L. Horing, and Matthew LeBaron. GTL Application at 7-8.

<sup>16</sup> *Id.* at 2. Neither GTL nor any of its 10% or greater direct or indirect owners hold interests in any other telecommunications entity. GTL July 30 Supplement Letter at 2.

<sup>17</sup> GTL Application at 2-3. Applicants state that the following wholly owned subsidiaries of GTL also hold authority to provide interstate and international telecommunications services and/or interconnected Voice over Internet Protocol services: (1) DSI-ITI, Inc.; (2) Public Communications Services, Inc.; (3) Value-Added Communications, Inc.; and (4) Telmate LLC. GTL Application at 2.

<sup>18</sup> *Id.* at 3.

<sup>19</sup> GTL October 9 Supplement Letter at 2; *see also* Legacy Discontinuance Application; Legacy Discontinuance Grant Public Notice.

<sup>20</sup> GTL Application at 4. The correctional facility customers at issue in the proposed transaction are listed in Attachment A hereto.

<sup>21</sup> GTL October 9 Supplement Letter at 3. GTL indicates that it "will make any necessary revisions to its interstate/international web-posted rates, terms, and conditions for ICS and ancillary service charges to incorporate the Legacy existing Correctional Facility Customer contract rates as necessary." *Id.*

<sup>22</sup> *Implementation of Further Streamlining Measures for Domestic Section 214 Authorizations*, CC Docket No. 01-150, Report and Order, 17 FCC Rcd 5517, 5533, paras. 29-30 (2002).

transactions taking into account the size of the entities involved and the unique concerns applicable to the inmate calling services industry, including the impact the transaction could have on the ability of incarcerated individuals to communicate with their families and other loved ones at just and reasonable rates and charges. We have also considered whether the transfer of the correctional facility contracts at issue in the proposed transactions would result in anti-competitive harm in the inmate calling services industry.<sup>24</sup>

We conclude that, based on the specific factual circumstances surrounding Legacy's decision to exit the ICS marketplace and cease providing inmate calling services, the likelihood of harm is minimal. Unlike proposed transactions where a carrier seeks to acquire and eliminate an independent growing competitor, Legacy has chosen to exit the inmate calling services industry, after considering other alternatives, for its own business reasons.<sup>25</sup> In doing so, it has worked to ensure continuity of service for its correctional facility customers through transactions with existing inmate calling services providers that could seamlessly honor the transferred contracts.<sup>26</sup> The proposed transactions are the result of that effort,<sup>27</sup> and no party has objected to NCIC or GTL acquiring the respective contracts reflected on Attachment A. Furthermore, upon consummation of the proposed transactions and expiration of the terms of the contracts transferred to NCIC and GTL, other inmate calling services providers will remain in the industry to compete for these contracts when they are publicly rebid, as typically occurs in this industry.<sup>28</sup>

With respect to NCIC, we agree that “[t]he financial and managerial support of NCIC will further the development of new and better services for the benefit” of the customers it will acquire from Legacy,<sup>29</sup> including new product offerings.<sup>30</sup> We also agree that its acquisition of the Legacy contracts

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<sup>23</sup> See *Applications Granted for the Transfer of Control of CenturyLink Public Communications, Inc. to Inmate Calling Solutions, LLC D/B/A ICSolutions*, WC Docket No. 20-150, Public Notice, 35 FCC Rcd 8661, 8663 & n.15 (WCB/IB 2020) (*CenturyLink/ICSolutions Grant Public Notice*) (citing *Rates for Interstate Calling Services*, WC Docket 12-375, Report and Order on Remand and Fourth Further Notice of Proposed Rulemaking, 35 FCC Rcd 8485, 8486-87, para. 5 (2020) (*2020 ICS Order and NPRM*)).

<sup>24</sup> Applicants in both transactions state that, upon closing of the proposed transaction, NCIC and GTL, independently, would each have a market share in the interstate, interexchange market of less than 10% and not be dominant with respect to any telecommunications service. NCIC Application at 2; GTL Application at 3. Applicants therefore requested streamlined treatment of their applications in accordance with the Commission's presumption that such applications qualify for streamlining. Because of the related nature of the multiple applications in these dockets by carriers providing inmate calling services, the necessary public interest review did not warrant streamlined treatment and the Bureaus exercised their discretion to accept the applications for non-streamlined processing. See 47 CFR § 63.03(c)(1)(v), (2). See also *CenturyLink/ICSolutions Grant Public Notice*, 35 FCC Rcd at 8662 & n.14.

<sup>25</sup> GTL October 9 Supplement Letter at 2; NCIC October 9 Supplement Letter at 2; see also Legacy Discontinuance Application at 2.

<sup>26</sup> GTL October 9 Supplement Letter at 2-3; NCIC October 9 Supplement Letter at 2-3.

<sup>27</sup> GTL October 9 Supplement Letter at 1, 3; NCIC October 9 Supplement Letter at 1, 3.

<sup>28</sup> See, e.g., Cook County, Illinois Government, Board of Commissioners, <https://cook-county.legistar.com/LegislationDetail.aspx?ID=3838415&GUID=B28DFE68-E804-4F19-8FCE-DCDFCC9B729E&Options=&Search=> (last visited November 18, 2020) (stating that Edovo's contract to provide services to Cook County jail and the Juvenile Temporary Detention Center “was awarded through Request for Proposals (RFP) procedures in accordance with the Cook County Procurement Code”). Although Legacy has determined it will transition away from providing inmate calling services, there is no evidence in this record of barriers that would prevent other inmate calling services providers from bidding on these contracts when they expire. See *CenturyLink/ICSolutions Grant Public Notice* at 35 FCC Rcd at 8664 & n.17.

<sup>29</sup> NCIC Application at 4.

<sup>30</sup> *Id.* at 5.

would allow NCIC to become a stronger competitor to larger inmate calling services providers, including GTL, and be better positioned to more competitively bid for future contracts by offering better prices and services for inmates and their families.<sup>31</sup>

With respect to GTL, given its position as the largest provider of inmate calling services in the United States,<sup>32</sup> any transaction that serves to increase GTL's industry position raises concerns of potential competitive harm and potential adverse impacts on incarcerated individuals' ability to communicate with their families and other loved ones at just and reasonable rates and charges. These concerns are mitigated here, however, based on the specific factual circumstances surrounding this transaction. The contracts to be transferred from Legacy to GTL (and NCIC) collectively represent a *de minimis* share of the inmate calling services industry in terms of both publicly available average daily population<sup>33</sup> and Commission data on total industry revenue.<sup>34</sup> For example, based on Commission data, GTL's industry share will only increase by roughly 1% as a result of acquiring the Legacy contracts for the remainder of their service terms.<sup>35</sup> Accordingly, although this transaction (as well as the NCIC transaction) is related to a reduction in the total number of competitors in the inmate calling services industry upon Legacy's ultimate exit, this proposed transaction is not the cause of that reduction, nor will it materially increase GTL's industry position in the inmate calling services industry so as to raise concerns of potential competitive harm. Moreover, Applicants assert that GTL has significant experience in the inmate calling services industry and that the pertinent correctional facility customers will continue

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<sup>31</sup> *Id.* at 4 (asserting that the proposed transaction between Legacy and NCIC would “allow[] NCIC to become a stronger competitor, which will result in the continued aspiration to provide fair and reasonable rates, low fees and live, friendly customer support to family and friends of the incarcerated.”). See *Applications of Level 3 Communications, Inc. and CenturyLink, Inc. for Consent to Transfer Control of Licenses and Authorizations*, Memorandum Opinion and Order, 32 FCC Rcd 9581, 9594, 9605, paras. 26 and 52 (2017) (finding no harm to competition where applicants competed for certain services and stating that the transaction would result in a newly combined firm that can be a more effective and stronger competitor against larger providers).

<sup>32</sup> *2020 ICS Order and NPRM*, 35 FCC Rcd at 8518, para. 94 (2020) (noting that GTL is the largest inmate calling services provider).

<sup>33</sup> Information concerning the correctional facilities and average daily populations served by inmate calling services providers is publicly available via annual reports filed by inmate calling services providers in WC Docket No. 12-375. See 47 CFR §§ 64.6060 (requiring providers to submit annual reports by April 1 of each calendar year). See also *Wireline Competition Bureau Announces OMB Renewal of Information Collection Concerning Inmate Calling Services*, WC Docket No. 12-375, Public Notice, 35 FCC Rcd 1456 (WCB 2020) (renewing the annual reporting requirement for three more years); *Instructions for Completing the Inmate Calling Services Annual Reporting Form (FCC Form 2301(a))* (Feb. 2020), <https://docs.fcc.gov/public/attachments/DOC-362551A2.docx>. (including ADP and facility names); *Rates for Interstate Inmate Calling Services*, WC Docket No. 12-375, Order, 35 FCC Rcd 9267, 9269, para. 6 (WCB 2020) (denying confidential treatment for facility names, inmate calling services rates, the amounts of ancillary charges, and average daily population).

<sup>34</sup> See *Wireline Competition Bureau Reminds Providers of Inmate Calling Services of the March 1, 2019 Deadline for Data Collection Responses*, Public Notice, 34 FCC Rcd 515 (WCB 2019); see also *2020 ICS Order and NPRM*, 35 FCC Rcd at 8518 & n.226 and Appx. E (Analysis of Responses to the Second Mandatory Data Collection) at Table 1 (Selected Statistics of Responding Providers) (including ADP and revenue) and Table 6 (Inmate Calling Services Revenues and Costs by Provider and for Industry (in \$ millions); *Wireline Competition Bureau and Office of Economics and Analytics Make Inmate Calling Services Database Available to Eligible Individuals Pursuant to Protective Order*, WC Docket No. 12-375, Public Notice, DA 20-1128, 35 FCC Rcd 10456 (WCB/OEA Sept. 24, 2020).

<sup>35</sup> Legacy and GTL also assert that their proposed transaction “will not provide [GTL] with any competitive advantage as the result of concentration of fiber assets and will not harm consumers or negatively impact the market for facilities-based service.” GTL Application at 5.

to receive high-quality service supported by GTL's inmate communications expertise and experienced management team.<sup>36</sup>

Applicants in both transactions represent that approval of the proposed transactions is necessary to avoid imminent disruptions in calling services at the pertinent correctional facilities for incarcerated end users residing in those facilities.<sup>37</sup> Such interruptions would impede incarcerated individuals' ability to maintain vital connections with families and loved ones that have been shown to increase their chances of success after release and lower the risk of recidivism.<sup>38</sup> We agree that approval and consummation of these two transactions will ensure that the affected correctional facilities, their resident incarcerated individuals, and those incarcerated individuals' families and loved ones continue to receive these essential communications services on an uninterrupted basis, which is of particular importance as the COVID-19 pandemic continues to preclude in-person visitation.

Finally, Applicants represent to the Commission that, after the completion of the proposed transactions, NCIC and GTL will continue providing high-quality services to the correctional facility customers and incarcerated end users pursuant to the same terms and conditions as their existing contracts with Legacy.<sup>39</sup> The Commission has previously deemed continued service to incarcerated individuals at existing rates, terms, and conditions to be a public benefit when reviewing a transaction between inmate calling services providers.<sup>40</sup>

Accordingly, pursuant to sections 214(a) and 214(c) of the Communications Act of 1934, as amended, 47 U.S.C. §§ 214(a), 214(c), and sections 63.03-04, 63.18, and 63.24 of the Commission's rules, 47 CFR §§ 63.03-04, 63.18, 63.24, and pursuant to the authority delegated under sections 0.51, 0.91, 0.261, and 0.291 of the Commission's rules, 47 CFR §§ 0.51, 0.91, 0.261, and 0.291, we grant the applications listed in this Public Notice.

Pursuant to section 1.103 of the Commission's rules, 47 CFR § 1.103, the consent granted herein is effective upon the release of this Public Notice. Petitions for reconsideration under section 1.106 or applications for review under section 1.115 of the Commission's rules, 47 CFR §§ 1.106, 1.115, may be filed within 30 days of the date of this Public Notice.

For further information, please contact Jesse Goodwin, Wireline Competition Bureau (202) 418-0958 or Sumita Mukhoty, International Bureau (202) 418-7165.

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<sup>36</sup> GTL Application at 5. *See Domestic Section 214 Application Granted for the Transfer of Control of Inmate Calling Solutions, LLC d/b/a ICSolutions to TKC Holdings, Inc.*, WC Docket No. 16-188, Public Notice, 31 FCC Rcd 8731, 8733 (WCB 2016) (recognizing "that there is a likelihood that a financially sound provider that has the requisite capital and management capability can provide service to benefit customers").

<sup>37</sup> GTL October 9 Supplement Letter at 2 ("Approval of the Transaction will ensure there is no disruption of service to Correctional Facility Customers . . . or end users of ICS as a result of Legacy's exit from the market."); NCIC October 9 Supplement Letter at 2. *See also Legacy Discontinuance Grant Public Notice*, 35 FCC Rcd at 2090 and Appx. (authorizing Legacy to discontinue service as of April 13, 2020).

<sup>38</sup> *2020 ICS Order and NPRM*, 35 FCC Rcd at 8486-87, para. 5

<sup>39</sup> *See* GTL Application at 5; NCIC Application at 4.

<sup>40</sup> *See Joint Application of Securus Investment Holdings, LLC, Securus Technologies, Inc., T-Netix, Inc., T-Netix Telecommunications Services, Inc., and SCRS Acquisition Corporation for Grant of Authority Pursuant to Section 214 of the Communications Act of 1934, As Amended, and Sections 63.04 and 63.24 of the Commission's Rules to Transfer Indirect Ownership and Control of Licensees*, WC Docket No. 17-126, Memorandum Opinion and Order, 32 FCC Rcd 9564, 9576, para. 30 (2017) (noting the commitment to provide "services to the same extent and at the same rates and on the same terms and conditions as are currently in effect" as a net public benefit of an inmate calling services transaction) (quotation marks omitted).

**Attachment A**

**SECTION 214 AUTHORIZATIONS**

**A. International**

<b><u>File Number</u></b>	<b><u>Authorization Holder</u></b>	<b><u>Authorization Number</u></b>
ITC-ASG-20200708-00112	Legacy Long Distance International, Inc.	ITC-214-19961125-00596 <sup>41</sup>
ITC-ASG-20200629-00101	Legacy Long Distance International, Inc.	ITC-214-19961125-00596 <sup>42</sup>

**B. Domestic**

The Wireline Competition Bureau grants the applications to transfer control of domestic section 214 authority in connection with the proposed transactions – WC Docket Nos. 20-207, 20-218.<sup>43</sup>

**Correctional Facility Contracts to Be Transferred from Legacy to GTL**

Bay County, Florida  
Carroll County, Maryland  
City of Santa Ana, California  
Cook County, Illinois  
Dõna Ana, New Mexico  
Dunn County, Wisconsin  
Fresno County, California  
Jackson County, Oregon  
Kane County, Illinois  
Maine Department of Corrections  
Mendocino County, California  
Santa Clara County, California  
Sonoma County, California  
Yolo County, California

**Correctional Facility Contracts to Be Transferred from Legacy to NCIC**

**Alabama**

Albertville City Police Dept.  
Arab City Police Dept.  
Daphne City Police Dept.  
Dothan Police Dept.  
Guntersville City Police Dept.

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<sup>41</sup> Legacy will retain its international section 214 authorization, ITC-214-19961125-00596. GTL will provide international service to its new customers pursuant to its existing international section 214 authorization, ITC-214-19970128-00044.

<sup>42</sup> Legacy will retain its international section 214 authorization, ITC-214-19961125-00596. NCIC will provide international service to its new customers pursuant to its existing international section 214 authorization, ITC-214-19970711-00394.

<sup>43</sup> 47 CFR § 63.03.

Houston County  
Montgomery County Detention Center  
Orange Beach Police Dept.

**Arizona**

Colorado River Indian Tribes Detention  
Hualapai Adult Detention Center  
White Mountain Apache Corrections Center

**California**

Alhambra Police Dept.  
Beverly Hills Police Dept.  
Buena Park Police Dept.  
Burbank Police Dept.  
Chula Vista City Jail  
Clovis Police Dept.  
Colusa County Jail  
Costa Mesa Police Dept.  
El Monte Police Dept.  
El Segundo Police Dept.  
Fremont Police Department  
Gardena Police Dept.  
Glendale Police Dept.  
Hawthorne Police Dept.  
Hayward Police Dept.  
Huntington Beach Police Dept.  
Inglewood Police Dept.  
Lodi Police Dept.  
Manhattan Beach Police Dept.  
Mariposa County Jail  
Monterey Park Police Dept.  
Pasadena Police Dept.  
Redondo Beach Police Dept.  
San Bernardino Juvenile Detention and Assessment Center  
Signal Hill Police Dept.  
Torrance Police Department  
Whittier Police Dept.

**Idaho**

Clark County Sheriff's Office  
Clearwater County Sheriff's Dept.  
Lewis County Sheriff's Office

**Massachusetts**

Boston PD

**Missouri**

Douglas County Sheriff  
Independence City Jail  
Montgomery County Jail



**Nebraska**

Lancaster Youth Services Center  
Pierce County Sheriff

**Nevada**

Elko County Sheriff's Office  
Washoe County Jail

**New Mexico**

Pueblo of Laguna Detention Facility  
Zuni Department of Corrections

**North Carolina**

Moore County Detention Center

**Ohio**

City of Middletown Police Dept.

**Oklahoma**

City of Tulsa Police Department  
Cleveland County

**Oregon**

Benton County Jail

**South Carolina**

Darlington County Prison Farm  
McCormick County Sheriff's Office

**Texas**

City of Hurst Police Dept.  
City of Lewisville  
The Colony Police Dept.  
Walker County

**Washington**

Adams County Sheriff's Dept.  
Grays Harbor County Jail  
Hoquiam Police Dept.

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