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December 14, 2020
Via Overnight Delivery

Ms. Tonawa Troupe, Acting Secretary
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215

RE: Application of Legacy Long Distance International, Inc. d/b/a Legacy Inmate Communications to Transfer Contracts to Network Communications International Corp. d/b/a NCIC Inmate Communications
Case No. 20-1796-CIO
TRF Docket No. 90-6422-TP-TRF

Dear Ms. Troupe:

Enclosed for filing please find the Application of Legacy Long Distance International, Inc. d/b/a Legacy Inmate Communications ("Legacy") to Transfer Contracts to Network Communications International Corp. d/b/a NCIC Inmate Communications.

An application to abandon all services is also being submitted on behalf of Legacy today in Case No. 20-1795-TP-ABN.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3005 or via email to swarren@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/Sharon R. Warren

Sharon R. Warren
Consultant

cc: Brian Hill – Legacy (Via E-Mail)
William L. Pope – NCIC (Via E-Mail)
tms: OHx2001

Enclosures
SW/mp

The Public Utilities Commission of Ohio
TELECOMMUNICATIONS FILING FORM

(Effective: 04-01-2020)

Per the Commission's 5/29/2019 "Implementation Order" in Case No. 19-0173-TP-ORD

This form is intended to be used with most types of required filings. It provide check boxes with rule references for the most common types of filings. It does not replace or supersede Commission rules in anyway.

In the Matter of the Application of <u>Legacy Long Distance</u>)	TRF Docket No. 90-6422-TP-TRF
<u>International, Inc. d/b/a Legacy Inmate Communications to</u>)	Case No. 20-1796-TP-CIO
<u>Transfer Contracts to Network Communications International</u>)	NOTE: Unless you have reserved a Case #, leave
<u>Corp d/b/a NCIC Inmate Communications</u>)	the "Case No." field BLANK.

Name of Registrant(s) Legacy Long Distance International, Inc.

DBA(s) of Registrant(s) Legacy Inmate Communications

Address of Registrant(s) 10833 Valley View Street, Suite 150 Cypress, CA 90630

Company Web Address www.legacyinmate.com

Regulatory Contact Person(s) Brian Hill

Phone (800)577-5534

Fax (800)700-1116

Regulatory Person's Email Address brian@edovo.com

Contact Person for Annual Report Ruth Betsy

Phone (407)740-8575

Consumer Contact Information Brian Hill

Phone (800)577-5534

Address (if different from above) [Click here to enter text.](#)

Motion for protective order included with filing? ☐ Yes ☒ No

Motion for waiver(s) filed affecting this case? ☐ Yes ☒ No [Note: Waivers may toll any automatic timeframe.]

Notes:

Sections I and II are pursuant to Ohio Administrative Code (OAC) [4901:1-6](#).

Section III – Part I - Carrier to Carrier is pursuant to OAC [4901:1-7](#) and Pole Attachment to OAC [4901:1-3](#)

Section III – Part II - Wireless is pursuant to OAC [4901:1-6-24](#).

Section IV – Attestation.

(1) Indicate the Carrier Type and the reason for submitting this form by checking the boxes below.

(2) For requirements for various applications, see identified section of the Ohio Administrative Code Chapter 4901 and/or the supplemental application form noted.

(3) Information regarding the number of copies required by the PUCO may be obtained from the PUCO's website at www.PUCO.ohio.gov under the docketing information system section (Procedural filing requirements), by calling the Docketing Division at 614-466-4095 or by visiting the Docketing Division at the offices of the PUCO.

(4) An Incumbent Local Exchange Carrier (ILEC) offering basic local exchange service (BLES) outside its traditional service area should choose CLEC designation when proposing to offer BLES outside its traditional service area or when proposing to make changes to that service.

All filings that result in a change to one or more tariff pages require, at a minimum, the following exhibits:

Exhibit	Description:
A	The tariff pages subject to the proposed change(s) as they exist before the change(s).
B	The tariff pages subject to the proposed change(s), reflecting the change, with the change(s) marked in the right margin.
C	A short description of the nature of the change(s), the intent of the change(s), and the customers affected.
D	A copy of the notice provided to customers, along with an affidavit that the notice was provided according to the applicable rule(s).

Section I – Part I - Common Filings:

Carrier Type: <input type="checkbox"/> Other (Explain below)	For Profit ILEC	Not for Profit ILEC	CLEC
Change terms & conditions of existing BLES.	<input type="checkbox"/> ATA 1-6-14(I)(2) (Auto 30 days)	<input type="checkbox"/> ATA 1-6-14(I) (Auto 30 days)	<input type="checkbox"/> ATA 1-6-14(I) (Auto 30 days)
Introduce non-recurring charge, surcharge or fee to BLES	<input type="checkbox"/> ATA 1-6-14(I) (Auto 30 days)		<input type="checkbox"/> ATA 1-6-14(I) (Auto 30 days)
Introduce or Increase Late Payment	<input type="checkbox"/> ATA 1-6-14(I) (Auto 30 days)	<input type="checkbox"/> ATA 1-6-14(I) (Auto 30 days)	<input type="checkbox"/> ATA 1-6-14(I) (Auto 30 days)
Revisions to BLES Cap	<input type="checkbox"/> ZTA 1-6-14(E) (0 day notice)		
Introduce BLES or expand local service area (calling area)	<input type="checkbox"/> ZTA 1-6-14(E) (0 day notice)	<input type="checkbox"/> ZTA 1-6-14(E) (0 day notice)	<input type="checkbox"/> ZTA 1-6-14(E) (0 day notice)
Change BLES Rates	<input type="checkbox"/> TRF 1-6-14(E) & (G) (0 day notice)	<input type="checkbox"/> TRF 1-6-14(E) (0 day notice)	<input type="checkbox"/> TRF 1-6-14(H) (0 day notice)
To obtain BLES pricing flexibility	<input type="checkbox"/> BLS 1-6-14(C)(1)(c) (Auto 30 days)		
Notice of no obligation to construct facilities and provide BLES	<input type="checkbox"/> ZTA 1-6-27(C) (0 day notice)	<input type="checkbox"/> ZTA 1-6-27(C) (0 day notice)	
Change in boundary	<input type="checkbox"/> ACB 1-6-32 (Auto 14 days)	<input type="checkbox"/> ACB 1-6-32 (Auto 14 days)	
Expand service operation area			<input type="checkbox"/> TRF 1-6-08(G) (0 day notice)
BLES withdrawal	<input type="checkbox"/> WBL 4927.10 (120 day notice)		<input type="checkbox"/> ZTA 1-6-25(B) (0 day notice)
Other (explain):			

*Other exhibits may be required under the applicable rule, see the 4901:106-14(E) Filing Requirements on the PUCO's webpage for a complete list of exhibits.

Section I – Part II – Customer Notification Offerings Pursuant to Chapter 4901:1-6-07 OAC

Type of Notice	Direct Mail	Bill Insert	Bill Notation	Electronic Mail
<input type="checkbox"/> 15-day Notice	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> 30-day Notice	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Date Notice Sent:				

Section I – Part III – Inmate Operator Service Pursuant to Chapter 4901:1-6-22 OAC

Introduce New	Tariff Change	Price Change	Withdraw
<input type="checkbox"/> TRF (0 day notice)	<input type="checkbox"/> ATA (Auto 30 days)	<input type="checkbox"/> TRF (0 day notice)	<input type="checkbox"/> UNC (Non-Auto)

Section II – Part I – Carrier Certification – Pursuant to Chapter 4901:1-6-08 & 10 OAC and Competitive Eligible Telecommunications Carrier Designation (CETC) – Pursuant to Chapter 4901:1-6-09 OAC

ILEC (Out of territory)	CLEC	Telecommunications Service Provider Not Offering Local Service	CESTC	CETC
<input type="checkbox"/> ACE 1-6-08 (Auto 30-day)*	<input type="checkbox"/> ACE 1-6-08 (Auto 30-day)*	<input type="checkbox"/> ACE 1-6-08 (Auto 30-day)*	<input type="checkbox"/> ACE 1-6-10 (Auto 30-day)	<input type="checkbox"/> UNC 1-6-09 (Non-Auto)*

*Supplemental forms can be found on the PUCO webpage – [Telecommunications application forms](#).

Section II – Part II – Change in Operation or Ownership

Change in Operation or Ownership	ILEC	CLEC	Telecommunications Service Provider Not Offering Local Service
Abandon all services		<input type="checkbox"/> ABN 1-6-26 (Auto 30 days)	<input type="checkbox"/> ABN 1-6-26 (Auto 30 days)
Change of official name *	<input type="checkbox"/> ACN 1-6-29(B) (Auto 30 days)	<input type="checkbox"/> ACN 1-6-29(B) (Auto 30 days)	<input type="checkbox"/> CIO 1-6-29(C) (0-day notice)
Change in ownership *	<input type="checkbox"/> ACO 1-6-29(E)(1) (Auto 30 days)	<input type="checkbox"/> ACO 1-6-29(E)(1) (Auto 30 days)	<input type="checkbox"/> CIO 1-6-29(C) (0-day notice)
Merger *	<input type="checkbox"/> AMT 1-6-29(E)(1) (Auto 30 days)	<input type="checkbox"/> AMT 1-6-29(E)(1) (Auto 30 days)	<input type="checkbox"/> CIO 1-6-29(C) (0-day notice)
Transfer certificate *	<input type="checkbox"/> ATC 1-6-29(B) (Auto 30 days)	<input type="checkbox"/> ATC 1-6-29(B) (Auto 30 days)	<input type="checkbox"/> CIO 1-6-29(C) (0-day notice)
Transaction for transfer or lease of property, plant or business *	<input type="checkbox"/> ATR 1-6-29(B) (Auto 30 days)	<input type="checkbox"/> ATC 1-6-29(B) (Auto 30 days)	<input checked="" type="checkbox"/> CIO 1-6-29(C) (0-day notice)
FCC Authorized Change in Ownership or Merger	<input type="checkbox"/> CIO 1-6-29 (E)(2) (0-day notice)	<input type="checkbox"/> CIO 1-6-29 (E)(2) (0-day notice)	<input type="checkbox"/> CIO 1-6-29 (E)(2) (0-day notice)

*Other exhibits may be required under the applicable rule(s). ACN, ACO, AMT, ATC, ATR, and CIO applications see the [4901:1-6-29 Filing Requirements](#) on the PUCO webpage for a complete list of exhibits.

Section III – Part I - Carrier to Carrier (Pursuant to 4901:1-7) & Attachments to Utility Equipment or Rights of Way (Pursuant to 4901:1-3)

Carrier to Carrier	ILEC	CLEC
Interconnection agreement or amendment to an approved agreement	<input type="checkbox"/> NAG 1-7-07 (Auto 90 days)	<input type="checkbox"/> NAG 1-7-07 (Auto 90 days)
Request for arbitration	<input type="checkbox"/> ARB 1-7-09 (Non-Auto)	<input type="checkbox"/> ARB 1-7-09 (Non-Auto)
Introduce or change carrier to carrier tariffs	<input type="checkbox"/> ATA 1-7-14 (Auto 30 days)	<input type="checkbox"/> ATA 1-7-14 (Auto 30 days)
Request rural carrier exemption, rural carrier suspension or modification	<input type="checkbox"/> UNC 1-7-04 or 05 (Auto 30 days)	
Changes in rates, terms & conditions to pole attachments, conduit occupancy and rights of way. (13-579-AU-ORD 11/30/16 Entry)	<input type="checkbox"/> ATA 1-3-04 (Auto 60 days)	

Section III – Part II – Facilities-based Wireless Service Providers (Pursuant to 4901:1-6-24)

Registration and Change in Operations*	<input type="checkbox"/> RCC 1-6-24(B) (0 day notice)
Interconnection Agreement or amendment to an approved Agreement.	<input type="checkbox"/> NAG 1-7-07 (0 day notice)

*Change in Operations filing must be filed in the original RCC case designation code established during the registration process.

Section IV. – Attestation

Registrant hereby attests to its compliance with the pertinent entries and orders issued by the Commission.

AFFIDAVIT

Compliance with Commission Rules

I am an officer/agent of the applicant corporation, Legacy Long Distance International, Inc., and am authorized to make this statement on its behalf.

Sharon R. Warren, Consultant
(Name)

Please check All that apply:

☐ I attest that these tariffs comply with all applicable rules for the State of Ohio. I understand that tariff notification filings do not imply Commission approval and that the Commission's rules, as modified and clarified from time to time, supersede any contradictory provisions in our tariff. We will fully comply with the rules of the State of Ohio and understand that noncompliance can result in various penalties, including the suspension of our certificate to operate within the State of Ohio.

☐ I attest that customer notices accompanying this filing form were sent to affected customers, as specified in Section II, in accordance with Ohio Adm. Code 4901:1-6-7.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 14, 2020 at Maitland, FL

/s/Sharon R. Warren

12/14/20

*Signature and Title

Date

**This affidavit is required for every tariff-affecting filing. It may be signed by counsel, an officer of the applicant or an authorized agent of the applicant.*

VERIFICATION

I, Sharon R. Warren, Consultant, verify I have utilized the Telecommunications Filing Form for the most proceedings provided by the Commission and that all of the information submitted here and all additional information in connection with this case, is true and correct to the best of my knowledge.

/s/Sharon R. Warren

12/14/20

*Signature and Title

Date

**Verification is required for every filing. It may be signed by counsel or an officer of the applicant, or an authorized agent of the applicant.*

File document electronically as directed in case number 06-900-AU-WVR

or

Send your completed Filing Form, including all required attachments as well as the required number of copies to:

**Public Utilities Commission of Ohio
Attention: Docketing Division
180 East Broad Street, Columbus, OH 43215-3793**

EXHIBIT A

LEGACY LONG DISTANCE INTERNATIONAL, INC.

NOTICE OF TRANSFER OF CUSTOMER CONTRACTS

And

CANCELLATION OF LEGACY LONG DISTANCE INTERNATIONAL, INC.'s AUTHORITY

Legacy Long Distance International, Inc. ("Legacy") and Network Communications International Corp d/b/a NCIC Inmate Communications ("NCIC") (collectively, the "Parties"), hereby notify the Commission of a transfer of customer contracts from Legacy to NCIC. The Parties have consummated a transaction whereby inmate communications services agreements for facilities in the state of Ohio were assigned by Legacy to NCIC pursuant to an Asset Assignment Agreement by and between Legacy and NCIC, effective December 1, 2020.

Since the contracts of Legacy have been transferred to NCIC, and Legacy no longer provides telecommunications in Ohio, the Parties also request that Legacy's authority (as outlined below) and any applicable tariffs be cancelled effective immediately. The Parties provide the following additional notice information:

I. DESCRIPTION OF THE PARTIES

A. Legacy Long Distance International, Inc. d/b/a Legacy Inmate Communications

Legacy is a California corporation, incorporated on September 17, 1996, with headquarters located at 10833 Valley View Drive, Suite 150, Cypress, CA 90830. Legacy is a wholly owned subsidiary of Jail Education Solutions, Inc. d/b/a Edovo, a Delaware corporation, with its principal place of business located at 215 W. Superior St., Suite 600, Chicago, IL 60654. Legacy is a full-service provider of inmate communications and investigative technology services at hundreds of correctional institutions nationwide. Legacy's services include operator services, debit, and prepaid calling. In Ohio, Legacy was granted a Certificate of Public Convenience and Necessity ("CPCN") to provide Inmate Operator Services in Certificate Number 90-6422-TP-TRF Case Number 17-1268-TP-ACE on August 22, 2017.

B. Network Communications International Corp d/b/a NCIC Inmate Communications

NCIC is a Texas S Corporation, incorporated on August 29, 1996, with its headquarters located at 607 East Whaley St., Longview, TX 75601. NCIC specializes in the provision of inmate communications services to the correctional industry utilizing a combination of various systems to include voice biometrics, call thresholding, and three-way call detection. NCIC's services include operator services, debit, and prepaid calling. NCIC currently provides service to over 750 correctional facilities in 50 states nationwide, including Puerto Rico. In Ohio, NCIC was granted a CPCN to provide Toll and Alternative Operator telecommunications services in Certificate Number 90-5845-CT-TRF and Case Number 98-1457-CT-ACE on December 14, 1998.

II. CONTACT INFORMATION

For the purposes of this Notice, contacts for the Parties are as follows:

Sharon R. Warren
Consultant
Inteserra Consulting Group, Inc.
151 Southhall Lane, Suite 450
Maitland, Florida 32751
(407) 740-3005 (voice)
(407) 740-0613 (facsimile)
Email: swarren@inteserra.com

III. DESCRIPTION OF THE TRANSACTION

On April 22, 2020, Legacy and NCIC entered into an Asset Sale and Assignment Agreement (the "Agreement"). Pursuant to this Agreement, NCIC will acquire specific inmate communications services contracts currently held by Legacy. Accordingly, upon consummation of the transaction outlined in the Agreement, NCIC now owns 100% of the contracts listed in the Agreement and will become the provider of service to these facilities. Upon closing, customers will continue to be serviced by NCIC on substantially the same terms and conditions as previously provided by Legacy. The transaction will not result in an interruption, reduction, loss or impairment of services to any customer.

The Applicants submit that the transaction is in the public interest and will be seamless from the perspective of NCIC's customers. As more fully described below in the public interest statement, NCIC continues to provide a high level of technical operations and customer service to Legacy's customers. The transaction raises no competitive issues and will have no adverse impact on Legacy's customers.

IV. PUBLIC INTEREST STATEMENT

The Parties submit that the Transaction described herein is in the public interest and will permit the continued, uninterrupted provision of high-quality service to the correctional facilities, inmates and their families. As noted previously, the Transaction will be seamless from the perspective of Legacy's Ohio customers because it will not result in an interruption, reduction, loss or impairment of services to any customer. It will promote competition in the inmate telecommunications marketplace, allowing 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 the family and friends of the incarcerated. The financial and managerial support of NCIC will further the development of new and better services for the benefit of the customers. The continued provision of service by NCIC will provide customers the positive benefit of access to existing and new product offerings. The transaction is transparent to customers and will not have a negative impact on the public interest, services to customers, or competition.

WHEREFORE, for the reasons stated above, Legacy Long Distance International, Inc. submits that the public interest, convenience and necessity would be furthered by this transaction and respectfully request approval of the cancellation of Legacy's telecommunications authority.

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

12/14/2020 4:29:05 PM

in

Case No(s). 20-1796-TP-CIO

Summary: Application Transfer Contracts electronically filed by Ms. Margeaux Pennywell on behalf of Legacy long Distance International, Inc.