



November 7, 1996

210 N. Park Ave.
P.O. Drawer 200
Winter Park, FL
32790-0200

Florida Public Service Commission
Division of Communications
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850



Tel: 407-740-8575
Fax: 407-740-0613

Re: Petition for Waiver of Rules and Requirements
Prohibiting Provision of 0+ Local and IntraLATA
Calls From Store and Forward Pay Telephones
Located in Confinement Institutions by Security
Telecom Corporation

961357-Tc

Dear Sir/Madam:

Enclosed for filing are the original and fifteen (15) copies of the above-referenced petition of Security Telecom Corporation for waiver of Commission rules and requirements related to 0+ local and intraLATA calls from confinement institutions.

Please acknowledge receipt of this filing by date-stamping the extra copy of this cover letter and returning it to me in the self-addressed, stamped envelope provided for this purpose.

Questions regarding this filing may be directed to my attention at (407) 740-8575.

Yours truly,

Hal Stringer
Consultant to
Security Telecom Corporation

cc: Marge Winter - Security
file: STC - FL PATS
tms: FL96001

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for waiver of rules and)
requirements prohibiting provision of)
0+ local and 0+ intraLATA calls from)
store-and-forward pay telephones located)
in confinement institutions by)
Security Telecom Corporation)
_____)

Docket No. _____

PETITION FOR WAIVER

Pursuant to Commission Rule 25-24.505(3), Florida Administrative Code, Security Telecom Corporation ("Security Telecom") petitions the Florida Public Service Commission ("Commission") for a waiver of those rules and requirements prohibiting Security Telecom from providing 0+ local and 0+ intraLATA calls using store-and-forward pay telephones located in confinement institutions within the state of Florida. In support of its petition, Security Telecom states:

1. Petitioner's name and address are:

Security Telecom Corporation
1209 W. North Carrier, Suite 300
Grand Prairie, Texas 75050
Telephone: (214) 988-3737
Facsimile: (214) 988-3774

2. All notices, orders or documents regarding this petition should be directed to:

Jeff Rothell
President
Security Telecom Corporation
1209 W. North Carrier, Suite 300
Grand Prairie, Texas 75050
Telephone: (214) 988-3737
Facsimile: (214) 988-3774

and Hal Stringer
Consultant to Security Telecom
Technologies Management, Inc.
P.O. Drawer 200
Winter Park, FL 32790-0200
Telephone: (407) 740-8575
Facsimile: (407) 740-0613

3. Security Telecom Corporation is incorporated under the laws of the State of Texas. Security Telecom currently holds a Certificate to Provide Pay Telephone Service, No. 4233, granted by the Commission on August 7, 1995 in Docket No. 950626-TC. In addition, the Company was recently granted a Certificate to Provide Interexchange Telecommunications Service, No. 4742 on October 8, 1996 in Docket No. 960812-TI. Security Telecom currently provides service through fifty-one instruments located in a confinement facility in Bay County.

4. Security Telecom offers telecommunications services to inmates of confinement institutions within the state of Florida. The Company installs sophisticated premises equipment in confinement institutions that permits inmates to make outgoing, collect-only calls without the assistance of a live operator. The company's service is provided through telephone instruments connected to a centralized call processing unit with store-and-forward capability.

Through this equipment, the company provides a number of controls and restrictions that serve to reduce or eliminate fraudulent use of telephone services. These restrictions also provide the confinement institution with increased control over the use of the telecommunications services by inmates of the institution.

Currently, automated 0+ collect-only interLATA calls may be placed by inmates within the confinement institution over resold facilities subscribed to by Security Telecom. Local and intraLATA calls are routed to the serving local exchange carrier for handling. Security Telecom's system collects and stores interLATA call detail information for each call. These call records are retrieved Security Telecom via dial up modem and submitted for billing through the its billing agent. Ultimately, call charges appear on the called party's monthly local phone bill.

In addition to call processing, Security Telecom's systems offer restrictive call blocking and screening. These features provide confinement institutions with the maximum degree of control over telecommunications services and help to minimize fraud. Call blocking prevents calls to directory assistance, "0-", 800 numbers, pay-per-call services, and emergency numbers (including 911) in order to reduce prank calls and fraudulent use of long distance services. Access to other interexchange carriers may also be denied. Call screening serves to eliminate harassing or threatening calls to individuals such as judges, sheriffs, witnesses or jury members. Security Telecom's systems allow institutions to enforce telephone curfews, without manual intervention, by pre-setting the hours during which calls can be processed from a given telephone instrument.

5. Security Telecom seeks waivers of Rules 25-24.515(7) and 25-24.620(2)(c) and (d). These rules currently prohibit Security Telecom from providing and billing for 0+ local and 0+ intraLATA calls placed by inmates of confinement institutions. Specifically, Security Telecom seeks authority to provide and bill for 0+ local and intraLATA calls placed by inmates using its store-and-forward pay telephones. Security Telecom believes that benefits afforded to confinement institutions and the general public, such as call screening and blocking, currently provided with its interLATA service will be enhanced if Security Telecom is allowed to handle 0+ local and 0+ intraLATA calls as well.

6. Waivers requested by Security Telecom are similar to those already granted by the Commission to other pay telephone providers including Ameritel Pay Phones, Inc.¹, ATN, Inc.², Global Tel*Link³, InVision Telecom, Inc.⁴, and T-Netix, Inc.⁵ In its orders granting waivers similar to those requested by Security Telecom, the Commission recognized that no reason could be found to prevent NPATS from carrying 0+ local and 0+ intraLATA calls. In addition, the Commission found that allowing NPATS to carry such calls is a step toward a more competitive market place.

7. Security Telecom agrees to charge no more than the servicing local exchange carrier for local and intraLATA 0+ calls placed from confinement institutions.

¹ In Re: Petition for waiver of Rules 25-24.620(2)(c) and (d) and 25-24.515(7), F.A.C., by Ameritel Pay Phones, Inc., Docket No. 960570-TC, Order No. PSC-96-1063-FOF-TC, Issued August 20, 1996.

² In Re: Request for waiver of rules and policies which prohibit provision of 0+ local and 0+ intraLATA calls from store-and-forward pay telephones located in confinement facilities, by ATN, Inc., Docket No. 960603-TC, Order No. PSC-96-1062-FOF-TC, Issued August 20, 1996.

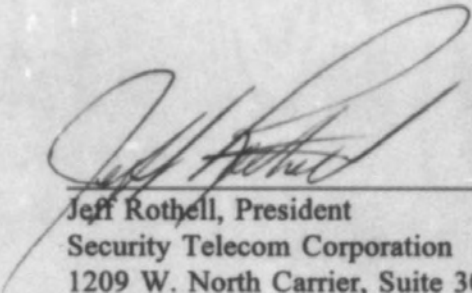
³ In Re: Petition for waiver of rules and policies to permit provision of 0+ local and 0+ intraLATA utilizing store and forward technology at pay telephones located in correctional institutions and other confinement facilities, by Global Tel*Link Corporation, Docket No. 951198-TC, Order No. PSC-96-0867-FOF-TC, Issued July 2, 1996.

⁴ In Re: Petition for waiver of requirement prohibiting provision of 0+ local and 0+ intraLATA calls from store-and-forward pay telephones located in confinement facilities, by InVision Telecom, Inc., Docket No. 960407-TC, Order No. PSC-96-1009-FOF-TC, Issued August 7, 1996.

⁵ In Re: Petition for waiver of Rule 25-24.515 (7), F.A.C., and Rule 25-24.620(2)(c) and (d), F.A.C., regarding 0+ local and 0+ intraLATA traffic, by T-Netix, Inc., Docket No. 95-1456-TP, Order No. PSC-96-0868-FOF-TP, Issued July 2, 1996.

WHEREFORE, Security Telecom Corporation respectfully requests that it be granted a waiver of the applicable rules, orders and policies currently prohibiting it from providing and billing for 0+ local and 0+ intraLATA calls made from store-and-forward pay telephones located in confinement institutions, and for such other relief as may be appropriate.

Respectfully submitted this 21st of October, 1996.



Jeff Rothell, President
Security Telecom Corporation
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Grand Prairie, Texas 75050