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September 8, 2020
Via Web Filing

Mr. Mark Johnson, Executive Secretary
Washington Utilities & Transportation Comm.
621 Woodland Square Loop
Lacey, WA 98503

RE: Notification of Transfer of Contracts
Legacy Long Distance International, Inc. d/b/a Legacy Inmate Communications and Network
Communications International Corp d/b/a NCIC Inmate Communications

Dear Mr. Johnson:

Legacy Long Distance International, Inc. d/b/a Legacy Inmate Communications (“Legacy”) and Network
Communications International Corp. d/b/a NCIC Inmate Communications (“NCIC”) hereby respectfully
notify the Commission of a pending transaction pursuant to which Legacy will assign its existing inmate
calling services contracts to NCIC.

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
William L. Pope - NCIC
tms: WAX2001

Enclosures
SW/mp

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UTIL. AND TRANSP.
COMMISSION

LEGACY LONG DISTANCE INTERNATIONAL, INC.

NOTICE OF TRANSFER OF CUSTOMER CONTRACTS

Legacy Long Distance International, Inc. d/b/a Legacy Inmate Communications (“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. Following the consummation of the Proposed Transaction (as defined below), Legacy will no longer operate within Washington and an application will be submitted to the Commission to cancel Legacy’s authority (as outlined below) and any tariffs on file with the Commission.

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 Washington, Legacy was granted a Registration to provide Competitive Telecommunication Services in Docket Number UT-170286 on May 17, 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 Washington, NCIC was granted a Registration to provide Competitive Telecommunication Services in Docket Number UT-991275 on September 8, 1999.

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 PROPOSED TRANSACTION

On April 22, 2020, Legacy and NCIC entered into an Asset Sale and Assignment Agreement (the "Agreement"). Pursuant to this Agreement, NCIC agreed to acquire specific inmate communications services contracts currently held by Legacy. Accordingly, upon consummation of the transaction contemplated by the Agreement, NCIC will own 100% of the contracts listed in the Agreement and will become the provider of service to these facilities. The transaction is expected to occur following the satisfaction of customary closing conditions, including the receipt of all required regulatory approvals. Upon closing, customers will continue to be serviced by NCIC on substantially the same terms and conditions as previously provided by Legacy. The consummation of the transaction will not result in an interruption, reduction, loss or impairment of services to any customer.

The Parties submit that the proposed 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 proposed transaction raises no competitive issues and will have no adverse impact on Legacy's customers.

IV. PUBLIC INTEREST STATEMENT

The proposed transaction will serve the public interest, convenience, and necessity as it will permit the continued, uninterrupted provision of high-quality service to the correctional facilities, inmates and their families. The transaction 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 effect of the transaction and transfer of customers from Legacy to NCIC will not result in an interruption, reduction, loss or impairment of services to any customer. The financial and managerial support of NCIC will further the development of new and better services for the benefit of the customers. Further, the Parties are not aware of any harm to customers or to the market that would occur as a result of the transaction. 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.

For each of the foregoing reasons the transfer of Legacy's contracts to NCIC is in the public interest and will have a positive impact on services to customers as well as encourage healthy competition within the marketplace.

VERIFICATION

I, Brian Hill, hereby declare that I am President and Chief Executive Officer of Legacy Long Distance International, Inc. d/b/a Legacy Inmate Communications (the "Company"); that I am authorized to make this Verification on behalf of the Company; that I have read the foregoing document; and that any statements in the foregoing document with respect to the Company are true and correct to the best of my knowledge, information and belief.

Executed on: August 25, 2020



Brian Hill
President and Chief Executive Officer
Legacy Long Distance International, Inc. d/b/a Legacy Inmate
Communications

VERIFICATION

I, William L. Pope, hereby declare that I am President of Network Communications International Corp d/b/a NCIC Inmate Communications (the "Company"); that I am authorized to make this Verification on behalf of the Company; that I have read the foregoing document; and that any statements in the foregoing document with respect to the Company are true and correct to the best of my knowledge, information and belief.

Executed on: August 29, 2020



William L. Pope

President

Network Communications International Corp

d/b/a NCIC Inmate Communications