

Responses to Information Requests Issued by the Minnesota Department of Commerce

Request Number: 8

Section 3.9.3 Paper Bill/Statement Fees states that customers will be required to pay \$2.00 to obtain a paper copy of their billing statement. This fee does not appear in rate schedules as listed in documents D-1, D-2, or D-3. The Company agreed in its RFP that it “must not...charge transaction fees including but not limited to purchase through live agent, automated phone or web, or mail; refund fees; or any other type of fees.”

1. Why does this additional charge appear in the tariff when it is not in the rate schedule as agreed to with Corrections?

2. As recently as 2017, the MN Public Utilities Commission disallowed a fee for paper statements (See *In the Matter of a Filing to Institute a Charge for Paper Bills for Customers*, Docket No. P-405/AM-17-427, Sept. 11, 2017.) Will VPC agree to voluntarily remove the \$2 charge for paper billing statements?

a. If not, state the reasons why.

ViaPath Response:

1. The paper bill fee set forth in Section 3.9.1 does not apply at Minnesota Department of Corrections facilities.

2. Yes, ViaPath will remove the \$2 charge for paper billing statements from the Tariffs.

Response Date: April 13, 2022

Response by: Pelicia E. Hall, Senior Vice President

Email Address: pelicia.hall@viapath.com

Phone Number: 601-708-3145

P5024/M-22-116 and P5024/M-22-117

Global Tel*Link Corporation d/b/a ViaPath Technologies

Value-Added Communications, Inc. d/b/a ViaPath Technologies

Responses to Information Requests Issued by the Minnesota Department of Commerce

Request Number: 9

Telephone tariffs filed with the Minnesota Public Utilities Commission (PUC) are to reflect current services offered, terms, conditions, and rates.

See information request #1 Response from Global Tel*Link d/b/a ViaPath Technologies (ViaPath), dated April 13, 2022, addressing the company's tariffs and the range of prices listed in the tariff. ViaPath states:

The Tariffs contain only rates for intrastate telephone calls occurring within Minnesota. Per the Tariff, interstate rates for telephone calls are published in ViaPath's interstate and international price list. **In addition, ViaPath provides intrastate ICS at the Minnesota Department of Corrections and at several Federal Bureau of Prisons ("FBOP") facilities located in Minnesota. The range of rates listed in the Tariffs are necessary to cover all the correctional facilities ViaPath serves and may serve in the future in Minnesota.** (emphasis added)

1. When filing corrected tariffs required as a result of Dockets 22-116 and 22-117, does ViaPath agree to file tariffs for services currently offered in Minnesota and remove reference to potential future services offered in Minnesota to avoid confusion for customers and potential customers?
2. When filing corrected tariffs required as a result of Dockets 22-116 and 22-117, does ViaPath agree to clarify which services, terms, conditions, and rates apply to the Minnesota Department of Corrections and which services, terms, conditions, and rates will apply to the Federal Bureau of Prisons ("FBOP") facilities located in Minnesota, to avoid confusion for customers and potential customers?

ViaPath Response:

1. Yes, ViaPath agrees to update the Tariffs to reflect services currently offered in Minnesota and remove reference to potential future services.
2. Yes, ViaPath agrees to update the Tariffs to clarify which services and rates apply to the Minnesota Department of Corrections and which services and rates apply to Federal Bureau of Prisons facilities located in Minnesota.

Response Date: May 20, 2022

Response by: Pelicia E. Hall, Senior Vice President

Email Address: pelicia.hall@viapath.com

Phone Number: 601-708-3145

P5024/M-22-116 and P5024/M-22-117

Global Tel*Link Corporation d/b/a ViaPath Technologies

Value-Added Communications, Inc. d/b/a ViaPath Technologies

Responses to Information Requests Issued by the Minnesota Department of Commerce

Request Number: 12

See information request #4 Response from Global Tel*Link d/b/a ViaPath Technologies (ViaPath), dated April 13, 2022, addressing refunds to customers and Advanced Payment Option and Prepaid Accounts, specifically, response to questions #4 and #5. Please provide the following information, which addresses the amount of unclaimed/abandoned customer funds held by ViaPath

1. Approximately how many customers never requested refunds for remaining funds in closed or inactive accounts during the years 2019, 2020, and 2021?
2. What was the total amount of funds left in Advance Pay Option accounts in each of the years 2019, 2020, and 2021?

ViaPath Response:

As explained in response to Request Number 11 above, ViaPath does not have mailing addresses for consumers holding AdvancePay Accounts. Once a consumer opens an AdvancePay Account, that account can be used to pay for calls received from incarcerated individuals throughout the United States. As stated in Section 3.6 of the Tariff, an AdvancePay Account is deemed inactive following three months of inactivity. Holders of an AdvancePay Account, however, may request a refund at any time for any funds remaining in the AdvancePay Account. A refund must be requested because ViaPath does not have mailing addresses for consumers holding AdvancePay Accounts, and ViaPath needs to ensure any refund is directed in the correct manner per the instructions of the AdvancePay Account holder.

In order to provide a response to Request Number 12, ViaPath reviewed AdvancePay Accounts that received at least one call from a correctional facility located in Minnesota during 2019, 2020, or 2021. However, these accounts could be held by consumers residing in Minnesota or outside Minnesota, and such calls could be intrastate calls or interstate calls. Based on this method of allocation, in calendar years 2019, 2020, and 2021, collectively, ViaPath identified *****START CONFIDENTIAL [REDACTED] END CONFIDENTIAL***** AdvancePay Accounts that received at least one call from a Minnesota correctional facility and were deemed inactive. Of these, *****START CONFIDENTIAL [REDACTED] END CONFIDENTIAL***** AdvancePay Accounts holders have not yet requested a refund. The total amount of funds remaining in the AdvancePay Accounts that received at least one call from a Minnesota correctional facility and were deemed inactive were: *****START CONFIDENTIAL [REDACTED] END CONFIDENTIAL*****. Based on the number of accounts, the amount of remaining funds per account is approximately *****START CONFIDENTIAL [REDACTED] END CONFIDENTIAL*****.

Response Date: May 20, 2022

Response by: Pelicia E. Hall, Senior Vice President

Email Address: pelicia.hall@viapath.com; Phone Number: 601-708-3145

P5024/M-22-116

Global Tel*Link Corporation d/b/a ViaPath Technologies

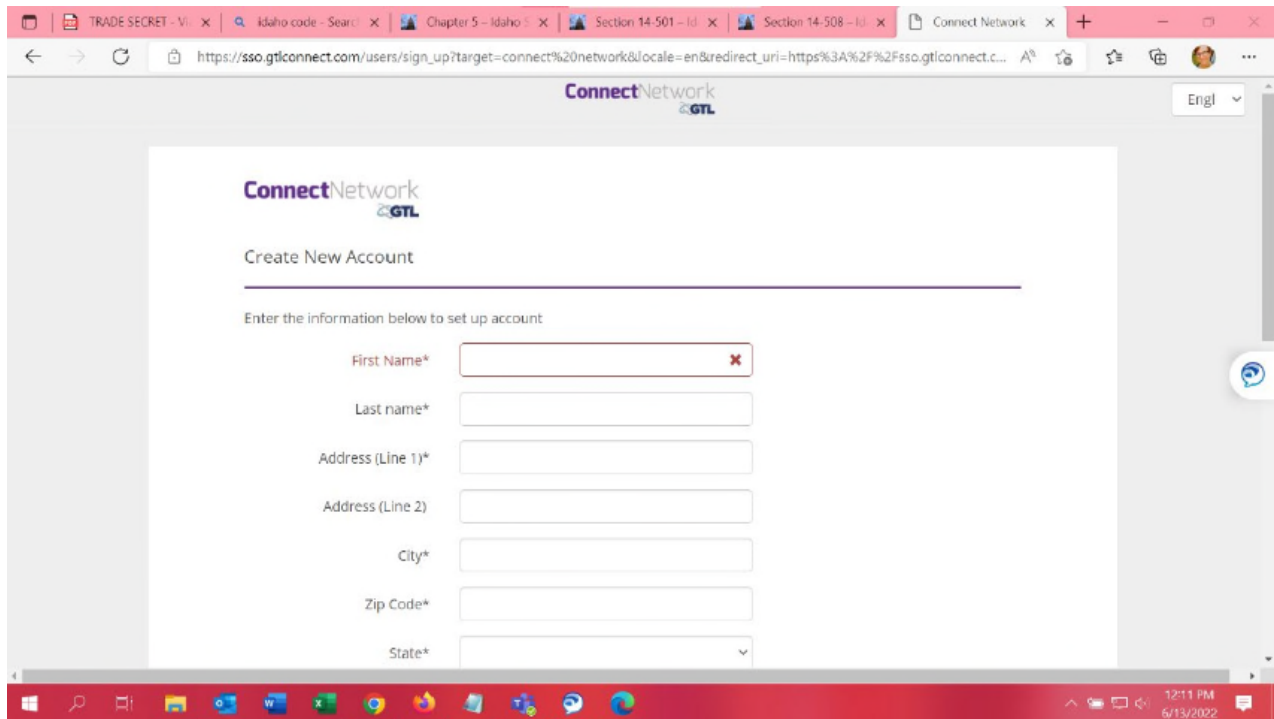
Responses to Information Requests Issued by the Minnesota Department of Commerce

Request Number: 17

When customers complete the “Create New Account” form on gtl.connect.com (as pictured in the screenshot below) does GTL retain the acquired information in its books or records?

a. If the answer to 1. is “yes,” how long does GTL retain the collected personal data in its books or records after the data is supplied by the customer?

b. If the answer to 1. is “no,” explain why GTL collects the personal data and what the company does with the personal data.

A screenshot of a web browser displaying the 'Create New Account' form on the ConnectNetwork GTL website. The browser's address bar shows the URL: https://sso.gtlconnect.com/users/sign_up?target=connect%20network&locale=en&redirect_uri=https%3A%2F%2Fsso.gtlconnect.c... The form itself is titled 'Create New Account' and includes the instruction 'Enter the information below to set up account'. The form fields are: 'First Name*' (with a red 'x' icon), 'Last name*', 'Address (Line 1)*', 'Address (Line 2)', 'City*', 'Zip Code*', and 'State*' (a dropdown menu). The browser's taskbar at the bottom shows various application icons and the system clock indicating 12:11 PM on 6/13/2022.

ViaPath Response:

The above screenshot included with Request Number 17 reflects the ConnectNetwork (CN) website general request for anyone using the CN website. It asks the friend/family member to enter a name and address in the initial set-up page. As ViaPath explained in Response to Request Number 13, an accurate name/address is not a prerequisite for opening a CN account. Accounts can be established using fictitious name/address information. There is no verification undertaken of the address information entered during the account setup process and the address information is not relied upon for purposes of creating an AdvancePay Account or issuing refunds or determining the actual location of the friend/family member. ViaPath retains the name and address information entered on the initial set-up page indefinitely.

Response Date: October 14, 2022

Response by: Pelicia E. Hall, Senior Vice President

Respondent Name: GTL

			additional fees will be applied. This includes charges for the person(s) accepting the call, the person(s) making the call, and any costs or fees associated with establishing and maintaining a pre-paid account.
11.2.1.1	(M) Contact Vendor must not charge transaction fees including but not limited to purchase through live agent, automated phone or web, or mail; refund fees; or any other type of fees.	Yes	
11.2.1.2	(M) Contract Vendor must provide all end-user charges for purchases through 3 rd parties (e.g. MoneyGram, Western Union, etc.) in Attachment D-1.	Yes	
11.2.1.3	(M) Contract Vendor must not set minimum purchase amounts for any of the services detailed in this RFP.	Yes	
11.2.3	(M) Respondents to provide full disclosure of all charges and fees associated with all services in Attachments D-1, D-2, and D-3.	Yes	
11.2.4	(M) Prepaid rates must be no more than Offender/Client/Resident debit rates.	Yes	
11.2.5	(M) When a prepaid account has been inactive for 60 days, Contract Vendor will automatically refund the account balance to the outside customer (prepaid) without any additional processing fees.	Yes	
11.3.1	(M) Describe the commission structure proposed, including but not limited to a description of a current installation of similar size and scope, commission structure used, percentage of commission to customer, and volume of calls commission is based upon.	Yes	<p>GTL's proposed rates are based upon providing the best value for the offender/client/residents and their families. GTL's rates, as instructed, are inclusive of a commission. GTL understands per 11.3.3 below that the State reserves the right to negotiate commissions with the successful respondent.</p> <p>GTL's proposed commission is based upon gross billed revenue from all inmate telephone calls (D-1), tablet content purchases (D-2), and charges received from payment services/debit release cards (D-3).</p>

m DEPARTMENT OF ADMINISTRATION STATE PROCUREMENT

Notification of Contract Award

To: Bryan Moses
Global Tel*Link Corporation
12021 Sunset Hills Road, Suite 100
Reston, VA 20190

Contract Number: 109200
Release Number: T-512(5)
Contract Period: July 1, 2019, or date of
contract execution, whichever
is later, through
June 30, 2024
Extension Option: Up to 24 Months

You are hereby notified that your response to our solicitation, which opened October 10, 2018, is accepted. This Contract Award includes all or part of the following products or services, as further specified in Exhibit A: Offender/Client/Resident Phone/Kiosk/Debit-Credit Card System.

The following documents, in order of precedence, are incorporated herein by reference and constitute the entire Contract between you and the State: (1) this Notification of Contract Award, together with Exhibits A, B-1, C-1, D-1, and any attachments or subsequent purchase orders, amendments or similar documents; (2) the State's solicitation; and (3) your response, including Exhibit E, Global Tel*Link Corporation End User License Agreement as negotiated. In the event of a conflict in language among any of these documents, the terms and conditions set forth and/or referenced in this Notification and any later executed documents shall prevail over conflicting terms and conditions contained in the earlier documents, in their original form or as amended.

1. Global Tel*Link Corporation

The Contractor certifies that the appropriate person(s) have executed this Contract on behalf of the Contractor as required by applicable articles, bylaws, resolutions, or ordinances.

By: _____

Signature

John Pitsenberger

Printed Name

Title: Chief Financial Officer (CFO)

Date: June 18, 2019

By: _____

Signature

Printed Name

Title: _____

Date: _____

2. Office of State Procurement

In accordance with Minn. Stat. § 16C.03, subd. 3.

By: _____

Title: Acquisition Management Specialist

Date: 9/9/19

3. Commissioner of Administration

Or delegated representative.

By: _____

Date: _____

Original signed

SEP 10 2019

By Lucas J. Jannetty

Department of Administration | Office of State Procurement
112 Administration Building, 50 Sherburne Avenue, Saint Paul, MN 55155
651-296-2600 | mn.gov/admin/mmd

Persons with a hearing or speech disability may contact us by dialing 711 or 1.800.627.3529

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Global Tel*Link Corporation d/b/a ViaPath Technologies

Responses to Information Requests Issued by the Minnesota Department of Commerce**Request Number: 18**

When GTL processes a payment to an AdvancePay Account through the website using the “My Account: Payment Methods / Stored Credit Cards / Add a New Credit/Debit Card” page (as pictured in the screenshot, as provided by GTL, below), is credit card and zip code information **automatically** retained in GTL’s books and records?

a. If the answer to 1. Is “yes,” does the AdvancePay customer using the “My Account: Payment Methods / Stored Credit Cards / Add a New Credit/Debit Card” page have the option to refuse to store their credit card information through this page?

b. If the answer to 1. is “yes,” how long does GTL retain customer credit card and zip code information in its books and records?

c. If the answer to 1. is “no” and customer credit card and zip code data are not automatically retained through this page, how long does GTL retain the data in its books and records in order to process the payment?

d. When customers take advantage of the ability to “store” credit card information through this option, how long does GTL retain the credit card and zip code data in its books and records?

ConnectNetwork
GTL
(/webapp/jsp/cn/dashboard/dashboard.cn)

My Account: Payment Methods

Stored Credit Cards

There are currently no debit or credit cards stored on your ConnectNetwork account. You can add a new debit or credit card by filling out the required information below.

Add a New Credit/Debit Card *Required

We accept Visa and Mastercard.

Card Number *

Name on Card *

Card Expiration Date *

Billing Address Zip Code *

P5024/M-22-116

Global Tel*Link Corporation d/b/a ViaPath Technologies

Responses to Information Requests Issued by the Minnesota Department of Commerce**ViaPath Response:**

No, ViaPath does not automatically retain credit card information, including the zip code associated with the credit card information. Pursuant to the PCI DSS, all cardholder data obtained during a transaction, including the zip code, is purged from memory immediately after a valid response is received from ViaPath's merchant bank(s). In the event a customer makes a request to store his/her credit card information, the relevant information is retained for a period of six (6) months, after which it is purged using an approved destruction method consistent with the PCI DSS. The credit card information is associated with the account not a particular state. Accounts can be used to receive calls from inmates in all 50 states.

Response Date: October 14, 2022

Response by: Pelicia E. Hall, Senior Vice President

Email Address: pelicia.hall@viapath.com

Phone Number: 601-708-3145

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Global Tel*Link Corporation d/b/a ViaPath Technologies

Value-Added Communications, Inc. d/b/a ViaPath Technologies

Responses to Information Requests Issued by the Minnesota Department of Commerce

Request Number: 11

See information request #4 Response from Global Tel*Link d/b/a ViaPath Technologies (ViaPath), dated April 13, 2022, addressing refunds to customers and Advanced Payment Option and Prepaid Accounts, specifically, response to question 3.

ViaPath described the Company's Debit Account Option as a customer option that provides automatic refunds as:

Debit Accounts: The GTL Cardless, real-time PIN Debit Calling solution allows Client/Offender/Residents to move funds from their existing commissary/trust accounts into their PIN Debit prepaid phone account. With this feature, unused funds in an Client/Offender/Resident debit phone account are either transferred back to his/her trust account in near real-time or otherwise refunded through a process locally established. Refunds occur at the time of release. There are no fees associated with Client/Offender/Resident phone account refunds.

1. For Debit Account customers that are not incarcerated and do not have a commissary account, what happens to remaining funds when their account becomes inactive?

2. When customers holding Advance Payment, Debit, or PrePaid accounts that have been inactive for three years or more have not requested refunds, does ViaPath relinquish those funds as abandoned property to the Department of Commerce? See: <https://mn.gov/commerce/industries/unclaimed-property/>

a. If the answer to 2. is "no," please explain.

ViaPath Response:

1. Debit Accounts are only held by incarcerated individuals in connection with the individual's commissary/trust account (these accounts are referred to as "Prepaid Debit Accounts" in the Tariff – see Section 3.5.1). Any unused funds remaining in a Prepaid Debit Account automatically are transferred back to the incarcerated individual's commissary/trust account or otherwise refunded to the individual through a process established by the correctional facility or the administrator of the commissary/trust account upon release of the individual from the correctional facility. ViaPath will update Section 3.5.1 of the Tariff to clarify this process when it files the other changes requested for Section 3.5.1.

2. See ViaPath's response to Request 11(1) above - there are no funds that remain in a Prepaid Debit Account after release of the incarcerated individual from the correctional facility.

As for AdvancePay Accounts, these accounts are opened by friends and family to receive collect calls from incarcerated individuals in correctional facilities. ICS is unlike other types of

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Responses to Information Requests Issued by the Minnesota Department of Commerce

telecommunications services. A telephone number and a credit card (or other form of payment such as cash or money order) is all that is needed to open an AdvancePay Account. ViaPath therefore does not have mailing addresses for consumers holding AdvancePay Accounts. The holder of the AdvancePay Account can be located anywhere in the United States. Once a consumer opens an AdvancePay Account, the account can be used to pay for collect calls received from incarcerated individuals throughout the United States.

Any funds remaining in a ViaPath AdvancePay Account are subject to the unclaimed property laws of the state of Idaho because ViaPath does not have AdvancePay Account holders' mailing addresses and ViaPath is an Idaho corporation. The United States Supreme Court has established two rules for determining which state has the jurisdiction to escheat unclaimed intangible property. The "primary rule" provides that, if the holder of the property (*i.e.*, ViaPath) has a record of the owner's address, then the state in which such address is located has the right to escheat. The "secondary rule" provides that if the holder (*i.e.*, ViaPath) does not have a record of the owner's address then the state of incorporation of the holder has the right to escheat the property. *See, e.g., Texas v. New Jersey*, 379 U.S. 674 (1965); *Pennsylvania v. New York*, 407 U.S. 206 (1972); *Delaware v. New York*, 507 U.S. 490 (1993).

ViaPath AdvancePay Accounts fall under the "secondary rule." As such, any funds remaining in AdvancePay Accounts are subject to the requirements of the Idaho Unclaimed Property Act, Idaho Code §§ 14-501 *et seq.*

Response Date: May 20, 2022

Response by: Pelicia E. Hall, Senior Vice President

Email Address: pelicia.hall@viapath.com

Phone Number: 601-708-3145



Create New Account

Enter the information below to set up account

First Name* Last name* Address (Line 1)* Address (Line 2) City* Zip Code* State* Country* Contact Phone Number* ☒ Is a mobile number?Email* Password* Confirm Password* ☐ I agree to Terms and Conditions

Cancel

Submit

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Attachment J
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Global Tel*Link Corporation d/b/a ViaPath Technologies

Value-Added Communications, Inc. d/b/a ViaPath Technologies

Responses to Information Requests Issued by the Minnesota Department of Commerce

Request Number: 13

Please explain why, if no address is required to open an account as stated in the above response to IR 11, #2, the address, phone number, and email fields as displayed on the screenshot, are required when creating a new account.

ViaPath Response:

Most AdvancePay accounts are established via the Company's interactive voice response ("IVR") system or via a live operator if the friend/family member chooses to utilize a live operator instead of the IVR. The reason IVR/live operator transactions primarily are used to establish AdvancePay accounts is because many friends/family members open their AdvancePay accounts when they receive their first collect call from an inmate. Upon receiving an inmate-initiated call, the Company's system gives the friend/family member the option to establish an account to pay for and receive the collect call (and any future collect calls). The friend/family member's address is not required to set up an AdvancePay account via the IVR or live operator. The friend/family member is required to provide only the zip code associated with the payment card used to fund the AdvancePay account.

AdvancePay accounts also may be opened via the ConnectNetwork website. As the screenshot provided reflects, the ConnectNetwork website asks the friend/family member to enter an address in the initial set-up page. However, an accurate address is not a prerequisite for opening an AdvancePay account. After log-in and password information is created on the initial set-up page, the friend/family member is given the option to enter payment card information to fund the AdvancePay account. The payment information page – see attached Exhibit 13 – asks the friend/family member to enter payment card information including the zip code associated with the payment card. There is no requirement that the zip code associated with the payment card match the zip code previously entered, and no address is required to be entered on the payment card page. AdvancePay accounts can be established using fictitious address information as long as the zip code entered on the payment card page matches the zip code associated with the payment card. Thus, the address entered during the first step of the account setup process may not reflect the actual address of the account holder for purposes of receiving a refund.

Response Date: July 15, 2022

Response by: Pelicia E. Hall, Senior Vice President

Email Address: pelicia.hall@viapath.com

Phone Number: 601-708-3145

P5024/M-22-116 and P5024/M-22-117

Global Tel*Link Corporation d/b/a ViaPath Technologies

Value-Added Communications, Inc. d/b/a ViaPath Technologies

Responses to Information Requests Issued by the Minnesota Department of Commerce

Request Number: 4

Maximum Security Collect Service, Section A. describes the Non-billable Local Exchange Company Program. That program also specifies that Customers receiving collect calls from incarcerated people must first establish a prepaid account. The tariff goes on to state that refunds of unused balances must be requested. The Maximum Security Collect Customer Account Provision – Direct Billing Arrangement, Section 3.7.1 B (10) contains this same provision.

Additionally, the tariffs include the Advance Pay Option. In the Company’s response to the Request For Proposals by the Department of Corrections, the Company agreed to the following:

“When a prepaid account has been inactive for 60 days, Contract Vendor will automatically refund the account balance to the outside customer (prepaid) without any additional processing fees.”

Please provide additional information about these options:

- 1. Does VPC consider the Advance Pay Option to be a deposit? Explain why or why not.**
- 2. When a company requires a deposit from a customer, Minn. Rules 7810.1500 and 7810.1600 apply to those deposits. Does VPC comply with these rules for practices and procedures related to VPC Advance Pay Option customers?**
- 3. Both tariffs state that customers must request a refund for remaining funds in their accounts, even after the accounts are closed. Are there any circumstances in which customers are refunded remaining funds in their accounts automatically, without the need to request return of the funds? If not, how does this comply with the contract with the Department of Corrections?**
- 4. Approximately how many customers never requested refunds for remaining funds in closed accounts during the years 2019, 2020, and 2021?**
- 5. What was the total amount of funds left in Advance Pay Option accounts in each of the years 2019, 2020, and 2021?**

ViaPath Response:

- 1. An AdvancePay Account option is not a deposit as that term is used in Section 2.9.1 of the Tariff. As explained in ViaPath’s response to Request Number 2 above, deposits apply when customers have not established good credit and are purchasing ICS on a “postpaid” basis (*i.e.*, paying for service after the service has been provided). An AdvancePay Account refers to an account established by a family or friend to receive collect calls from incarcerated individuals and**

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Global Tel*Link Corporation d/b/a ViaPath Technologies

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pay for the collect call. Collect call charges are deducted in real time from the AdvancePay Account when a call is accepted from an incarcerated person.

2. Please see ViaPath's response to #1 above of this Request Number 4.

3. Yes. First, ViaPath clarifies that the language quoted by the DOC in Information Request Number 4 ("When a prepaid account has been inactive for 60 days, Contract Vendor will automatically refund the account balance to the outside customer (prepaid) without any additional processing fees.") is a quote of the Minnesota Department of Corrections Request For Proposals ("RFP") at 11.2.5. ViaPath's response to RFP 11.2.5 was "Yes." ViaPath responded in the affirmative that it provides customers refunds of account balances without any additional processing fees. ViaPath further confirmed its refund policies in response to RFP 2.24.1, which states:

"Debit Accounts: The GTL Cardless, real-time PIN Debit Calling solution allows Client/Offender/Residents to move funds from their existing commissary/trust accounts into their PIN Debit prepaid phone account. With this feature, unused funds in an Client/Offender/Resident debit phone account are either transferred back to his/her trust account in near real-time or otherwise refunded through a process locally established. Refunds occur at the time of release. There are no fees associated with Client/Offender/Resident phone account refunds.

AdvancePay Accounts: Funds paid in advance for Client/Offender/Resident calls are available for refund upon request by the owner of the account. **GTL provides the most advantageous refund policy for consumers.** Unique among major OTS vendors, GTL will issue refunds on unexpired and expired prepaid accounts at any time with no time limitations. Most vendors will expire an account after approximately 6 months and no refunds are then available. GTL does not charge any fees when issuing a refund.

Refunds credited to the last credit card used are typically processed within 7-10 business days.

Refunds made by check are typically process within 15-30 days.

GTL prepaid accounts do not expire. Refund and account closure information is provided on GTL's ConnectNetwork website. After login to his or her account, the account owner selects the **Close Account** option and follows the simple instructions.

Inactive GTL AdvancePay accounts can be reinstated at any time. Should an account be deactivated and the account holder requests that it be reactivated, GTL will arrange for this by making any unused funds available again for use. There are no fees associated with this transaction."

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Global Tel*Link Corporation d/b/a ViaPath Technologies

Value-Added Communications, Inc. d/b/a ViaPath Technologies

Responses to Information Requests Issued by the Minnesota Department of Commerce

4. Refunds or reactivation of inactive AdvancePay Accounts may be requested at any time upon request of the customer at no additional cost. Please see the response to #3 above of this Request Number 4.

5. Please see the response to #4 above of this Request Number 4.

Response Date: April 13, 2022

Response by: Pelicia E. Hall, Senior Vice President

Email Address: pelicia.hall@viapath.com

Phone Number: 601-708-3145