



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Office of the Secretary

February 23, 2024

Jake Wiener, Counsel
Chris Frascella, Counsel
John Davisson, Director of Litigation & Senior Counsel
Electronic Privacy Information Center
1519 New Hampshire Avenue, NW
Washington, D.C. 20036

Re: Global Tel*Link, FTC File No. 212-3012

Dear Messrs. Wiener, Frascella, and Davisson,

Thank you for your letter regarding the Commission's proposed settlement with Global Tel*Link Corporation and its subsidiaries (collectively, "GTL"). We appreciate EPIC's interest in the matter and its support for the proposed settlement. We also share your belief in the importance of protecting incarcerated consumers and their loved ones from unfair and deceptive business practices. The Commission strives to ensure that all consumers – regardless of circumstance – are protected from violations of the consumer protection laws we enforce. Below, we address a number of points in your letter with specificity.

First, your letter underlines the importance of the Proposed Order's data retention limits and asks that the Commission ensure that proposed Respondents do not evade such limits. We agree that retention limits are an important protection for consumers and commit to vigorously enforcing the Proposed Order once it is finalized.

Second, your letter asks that the Proposed Order be modified to incorporate services to assist with interpreting and resolving inaccuracies in consumer reports. We agree that consumers may benefit from assistance with understanding consumer reports and acting on the information they receive from credit monitoring services. Of relevance, the Proposed Order currently requires that the credit monitoring product provided by GTL include access to a customer service center to provide assistance with, among other things, "monitoring alerts questions, dispute assistance, fraud resolution assistance, and other assistance related to the [credit monitoring product]."

Third, your letter highlights the unique communications challenges faced by incarcerated consumers and asks that the Commission "consider mandating a longer enrollment period than the current 90 days required by section V(F) of the Proposed Order to ensure that slow communications do not hamper inmates' efforts to obtain credit monitoring and other relief." We share your concern that incarcerated consumers' receipt of enrollment instructions for the credit monitoring product may be delayed or prevented by security or administrative processes.

Therefore, the 90-day enrollment period described in sub-Provision V.F of the Proposed Order does not begin to run until consumers receive the enrollment information. Additionally, sub-Provision V.C of the Proposed Order requires that GTL must attempt to resend the instructions if there is reason to believe that consumers have not received them, including because they have been lost or delayed as a result of facilities' processes.

Fourth, your letter asks for assurances that incarcerated consumers will not be required to pay to communicate with the credit monitoring product provider. To the extent feasible, the Proposed Order includes provisions that should eliminate or mitigate financial burden for consumers associated with such communications. As your letter notes, sub-Provision V.E of the Proposed Order requires that GTL make reasonable efforts to ensure that incarcerated consumers' communications with the provider of the service are free of charge. Additionally, sub-Provision V.H of the Proposed Order provides that GTL "must not receive or retain any monetary benefit from" the credit monitoring product. This encompasses any monetary benefit that GTL would otherwise receive in connection with communications between incarcerated consumers and the credit monitoring product provider.

Finally, your letter asks the Commission to "ensure that GTL provides services in multiple languages." The Commission agrees that language access for consumers is essential and has worked to make its own consumer resources—including those provided through identitytheft.gov—available in multiple languages. We support further efforts to ensure that consumers can access consumer reports and related information in appropriate languages.

The Commission has determined that the public interest would best be served by issuing the complaint and Decision and Order in the above-titled proceeding in final form without any modifications. The final Decision and Order and other relevant materials are available from the Commission's website at <http://www.ftc.gov>. It helps the Commission's analysis to hear from a variety of sources in its work, and it thanks you again for your comment.

By direction of the Commission.

April J. Tabor
Secretary