Before the
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Petition of Recipients of Collect Calls From Prisoners at Correctional Institutions in Massachusetts Seeking Relief from the Unjust and Unreasonable Cost of Such Calls	)	D.T.C. 11-16

RESPONSE OF BARBARA DIGIROLAMO TO GLOBAL TEL*LINK CORPORATION'S FIRST SET OF INFORMATION REQUESTS TO PETITIONERS

RESPONSES TO INFORMATION REQUESTS

GENERAL OBJECTIONS

General Objections:

1. The Petitioners object to the requirement that each petitioner provide documents and information dating back to 1998. This is overbroad, unduly burdensome and unlikely to lead to the discovery of relevant information.

   Notwithstanding this objection, and without waiving this objection, the Petitioners have provided all responsive documents in their possession.

2. The Petitioners object to these requests insofar as they seek information already in the possession of the Respondents. This is unduly burdensome.

   Notwithstanding this objection, and without waiving this objection, the Petitioners have provided all responsive records and documents in their possession.

   In particular, the Petitioners produce all Inmate Calling Service (ICS) requests for proposals and contracts that were obtained from correctional facilities through requests made under the Massachusetts Public Records Act. The Petitioners do not represent that these documents are complete. Individual petitioners have also produced records relating to their ICS service, but do not represent that these documents are complete, and the absence of such documents for any petitioner should not be interpreted to imply that no such records exist as regards that petitioner.

Responses

DTC - GTL 1-1:

Identify every Petitioner in this action. For each Petitioner that is an entity, provide its physical address, mailing address if different from its physical address, telephone number, and a list of all officers and directors or partners and their titles since January 1, 1998. For each Petitioner who is a natural person, provide that individual's mailing address(es), place(s) of business, telephone number, and any aliases or other names that person has used since January 1, 1998.

Response:

Ms. DiGirolamo resides at 669 Saratoga St. East Boston, MA 02128, (617)-567-5576. She has used no aliases.

DTC - GTL 1-2:

For each telephone call that you received from, or placed as, a prisoner or inmate in a Massachusetts correctional facility since January 1, 1998, identify the name of the facility from which the call was placed, the parties to the call, the date and time of the call, the duration of the call, the amount charged for the call, whether the telephone call was placed using a prepaid calling card or as a collect call, the telephone service provider used, and all issues, if any, that you allege affected the quality of the call. Produce all documents, including any billing records or PINs relating to each such call.

Response:

Ms. DiGirolamo objects to the request insofar as it requires her to identify each call received since 1998 and provide specific information regarding each call. This request is unduly burdensome.

Without waiving this objection, Ms. DiGirolamo states she received calls from her nephew Tony Giugliano beginning in September 2005 and ending in March 2014 while he was at MCI-Concord, MCI-Norfolk, Souza Baranowski Correctional Center, and Boston Prerelease Center. Ms. DiGirolamo initially paid for these calls by accepting them as collect calls and then by sending her nephew money to deposit in his prepaid debit account for phone calls. She has no documents responsive to this request.

DTC - GTL 1-3:

For each telephone call identified in response to DTC-GTL 1-2 that you allege was of poor quality, identify the alleged quality issues(s) and the cause(s) of the alleged quality issue(s), explain how you determined the cause(s) of the issue(s), and if you placed the call from a correctional facility, describe the telephone equipment you used to place the call, and whether the telephone service provider was contacted about the issue, the date and time of such contact, and all documents supporting such contact.

Response:

Ms. DiGirolamo objects to the request insofar as it requires her to identify and describe each call of poor quality. This request is unduly burdensome.

Without waiving this objection, Ms. DiGirolamo states that she was a party to collect and prepaid phone calls between herself and her nephew Tony Giugliano. She personally witnessed poor sound quality, bad connections and frequent dropped calls preceded by a recording stating that a three-way call was detected, when in fact she did not have three-way calling features installed on her phone. Ms. DiGirolamo is not a telecommunications technician. She determined that the poor sound quality, bad connections and dropped calls based on false three-way call detection occurred repeatedly when GTL was the phone service provider that these problems are associated with the phone service provided by GTL. Ms. DiGirolamo complained to GTL via telephone and does not have documents or records regarding her complaints in her possession.

DTC - GTL 1-4:

For Petitioners who are lawyers, law firms or otherwise provide legal services and that claim they have declined to accept calls placed from Massachusetts correctional facilities, or have limited the acceptance of such calls in any way, identify by date and time each instance in which an incoming call was declined and the individual attempting to place the call, and produce all documents relating to such calls and all any policies or procedures relating to accepting, declining or limiting calls placed from Massachusetts correctional facilities.

Response:

This does not apply to Ms. DiGirolamo.

DTC - GTL 1-5:

Identify each Petitioner that has used a prepaid calling card to place or receive a telephone call from a Massachusetts correctional facility and produce all documents relating to such prepaid calling cards or their use, including the PINs associated with those cards or other prepaid card activation and use records.

Response:

Ms. DiGirolamo sent her nephew money that he used to pay for calls through his debit account with the Department of Correction from the time this payment option became available to him in 2008 through his release in March, 2014. Prior thereto Ms. DiGirolamo paid for collect calls through her Verizon account until GTL, without prior notice, terminated her ability to do so. She has no documents responsive to this request in her possession.

DTC - GTL 1-6:

Produce all documents relating to per-call surcharges and/or tariffed service or other fees assessed by telephone service providers serving any Massachusetts correctional facility.

Response:

Ms. DiGirolamo has no responsive documents in her possession.

DTC - GTL 1-7:

Produce all documents that were used or relied upon in relation to creating the chart attached as Appendix II to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix II, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Ms. DiGirolamo, who did not participate in creating the chart attached as Appendix II to the Petition.

DTC - GTL 1-8:

Produce all documents that were used, or relied upon, to create Appendix III to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix III, and identify all individuals who were involved in the creation of Appendix III.

Response:

This request does not apply to Ms. DiGirolamo, who did not participate in creating the chart attached as Appendix III to the Petition.

DTC - GTL 1-9:

Produce all documents that were used, or relied upon, to creating the chart attached as Appendix IV to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix IV, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Ms. DiGirolamo, who did not participate in creating the chart attached as Appendix IV to the Petition.

DTC - GTL 1-10:

Produce all documents that were used, or relied upon, in relation to creating Appendix V to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix V, and identify all individuals who were involved in the creation of Appendix V.

Response:

This request does not apply to Ms. DiGirolamo, who did not participate in creating the chart attached as Appendix V to the Petition.

DTC - GTL 1-11:

Produce all documents that were used, or relied upon, in relation to creating the chart attached as Appendix VI to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix VI, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Ms. DiGirolamo, who did not participate in creating the chart attached as Appendix VI to the Petition.

DTC - GTL 1-12:

State whether you allege that the telephone rates for in-state and local calls charged by telephone service providers serving Massachusetts correctional facilities violate the Order on Payphone Barriers to Entry & Exit, and OSP Rate Cap issued on or about April 17, 1998 by the Massachusetts Department of Telecommunications and Energy, which was the predecessor agency to the Massachusetts Department of Telecommunications and Cable (the "1998 Order") or any other Massachusetts law or regulation. If your answer is yes to any portion of this

request, explain in detail which rates you allege violate the 1998 Order, other law or regulation and how those rates violate the 1998 Order, law or regulation.

Response:

Ms. DiGirolamo objects to this request as calling for a legal conclusion. Without waiving this objection, Ms. DiGirolamo refers to Petitioner PLS' response to this request.

DTC - GTL 1-13:

Produce all documents reflecting all correspondence or communications you have had with a telephone service provider regarding any of the allegations in the Petition in this proceeding, including in its Amendments, including all billing records, requests for information relating to billing, and complaints regarding quality of service.

Response:

Ms. DiGirolamo has no responsive documents in her possession.

DTC - GTL 1-14:

For each Petitioner that submitted an affidavit in this proceeding, identify all statements included in your affidavit that have changed since the time you signed your affidavit or were incorrect at the time of signing and provide a statement in response to this request updating and/or correcting your affidavit.

Response:

Ms. DiGirolamo states that she stands by the facts as stated in her affidavit when she signed it. She states that after she signed her affidavit her nephew was repeatedly charged for the maximum call duration time allowable for each separate call although that separate call was dropped prior to expiration of the maximum call duration time allowable for each separate call.

DTC - GTL 1-15:

For each Petitioner that did not submit an affidavit in this proceeding, provide a statement in response to this request explaining why you did not submit an affidavit and detailing all issues that you allege support your inclusion as a Petitioner.

Response:

This request does not apply to Ms. DiGirolamo.

DTC - GTL 1-16:

Produce all documents relating to communications with Global Tel*Link or its predecessor relating to any allegations of quality of service or billing issues in relation to telephone calls placed from any Massachusetts correctional facility. If you have no such documents, please state that in writing.

Response:

Ms. DiGirolamo has no responsive documents in her possession.

DTC - GTL 1-17:

Produce all documents relating to any communications you have had with the Department of Telecommunications and Cable, any Massachusetts correctional facility, any other federal, state, county or local agency or official, including the Federal Communications Commission, relating to telephone calls placed by prisoners or inmates at correctional facilities.

Response:

Ms. DiGirolamo has no responsive documents in her possession.

Before the
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Petition of Recipients of Collect Calls From Prisoners at Correctional Institutions in Massachusetts Seeking Relief from the Unjust and Unreasonable Cost of Such Calls	)	D.T.C. 11-16

RESPONSE OF ROGER CARVER TO GLOBAL TEL*LINK CORPORATION'S FIRST SET OF INFORMATION REQUESTS TO PETITIONERS

RESPONSES TO INFORMATION REQUESTS

GENERAL OBJECTIONS

General Objections:

1. The Petitioners object to the requirement that each petitioner provide documents and information dating back to 1998. This is overbroad, unduly burdensome and unlikely to lead to the discovery of relevant information.

   Notwithstanding this objection, and without waiving this objection, the Petitioners have provided all responsive documents in their possession.

2. The Petitioners object to these requests insofar as they seek information already in the possession of the Respondents. This is unduly burdensome.

   Notwithstanding this objection, and without waiving this objection, the Petitioners have provided all responsive records and documents in their possession.

   In particular, the Petitioners produce all inmate calling service (ICS) requests for proposals and contracts that were obtained from correctional facilities through requests made under the Massachusetts Public Records Act. The Petitioners do not represent that these documents are complete. Individual petitioners have also produced records relating to their ICS service, but do not represent that these documents are complete, and the absence of such documents for any petitioner should not be interpreted to imply that no such records exist as regards that petitioner.

Responses

DTC - GTL 1-1:

Identify every Petitioner in this action. For each Petitioner that is an entity, provide its physical address, mailing address if different from its physical address, telephone number, and a list of all officers and directors or partners and their titles since January 1, 1998. For each Petitioner who is a natural person, provide that individual's mailing address(es), place(s) of business, telephone number, and any aliases or other names that person has used since January 1, 1998.

Response:

Mr. Carver currently resides at 12 Briarwood Court, North Andover, MA 01845, 978-681-7704. Mr. Carver has resided at this address since 2004. From 1992-2004 Mr. Carver resided at 37 Royal Crest Drive, North Andover, MA 01845. He has used no aliases.

DTC - GTL 1-2:

For each telephone call that you received from, or placed as, a prisoner or inmate in a Massachusetts correctional facility since January 1, 1998, identify the name of the facility from which the call was placed, the parties to the call, the date and time of the call, the duration of the call, the amount charged for the call, whether the telephone call was placed using a prepaid calling card or as a collect call, the telephone service provider used, and all issues, if any, that you allege affected the quality of the call. Produce all documents, including any billing records or PINs relating to each such call.

Response:

Mr. Carver objects to the request insofar as it requires him to identify each call received since 1998 and provide specific information regarding each call. This request is unduly burdensome.

Without waiving this objection, Mr. Carver states that he does not have records of the calls between him and his son James Carver (also a petitioner) during his son's over 20 years in DOC custody a Massachusetts Correctional Institutions: Norfolk, Souza Baranowski Correctional Center, and Shirley Medium. From 1998 to date, he was a party to collect, advance/prepaid, and debit calls. Mr. Carver only has one billing record in his possession, which is from August of 2009. He has attached that billing record.

DTC - GTL 1-3:

For each telephone call identified in response to DTC-GTL 1-2 that you allege was of poor quality, identify the alleged quality issues(s) and the cause(s) of the alleged quality issue(s), explain how you determined the cause(s) of the issue(s), and if you placed the call from a correctional facility, describe the telephone equipment you used to place the call, and whether

the telephone service provider was contacted about the issue, the date and time of such contact, and all documents supporting such contact.

Response:

Mr. Carver objects to the request insofar as it requires him to identify and describe each call of poor quality during his ten years in custody. This request is unduly burdensome.

Without waiving this objection, Mr. Carver states that he continues to experience the issues stated in paragraphs 5 and 6 of his original affidavit. He did not submit written or verbal complaints about the many inaudible calls.

DTC - GTL 1-4:

For Petitioners who are lawyers, law firms or otherwise provide legal services and that claim they have declined to accept calls placed from Massachusetts correctional facilities, or have limited the acceptance of such calls in any way, identify by date and time each instance in which an incoming call was declined and the individual attempting to place the call, and produce all documents relating to such calls and all any policies or procedures relating to accepting, declining or limiting calls placed from Massachusetts correctional facilities.

Response:

This does not apply to Mr. Carver.

DTC - GTL 1-5:

Identify each Petitioner that has used a prepaid calling card to place or receive a telephone call from a Massachusetts correctional facility and produce all documents relating to such prepaid calling cards or their use, including the PINs associated with those cards or other prepaid card activation and use records.

Response:

Mr. Carver was a party to collect calls and his son James Carver (also a petitioner) paid for prepaid calls. Mr. Carver does not have records related to his son's prepaid account.

DTC - GTL 1-6:

Produce all documents relating to per-call surcharges and/or tariffed service or other fees assessed by telephone service providers serving any Massachusetts correctional facility.

Response:

Mr. Carver has no responsive documents in his possession.

DTC - GTL 1-7:

Produce all documents that were used or relied upon in relation to creating the chart attached as Appendix II to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix II, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Mr. Carver, who did not participate in creating the chart attached as Appendix II to the Petition.

DTC - GTL 1-8:

Produce all documents that were used, or relied upon, to create Appendix III to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix III, and identify all individuals who were involved in the creation of Appendix III.

Response:

This request does not apply to Mr. Carver, who did not participate in creating the chart attached as Appendix III to the Petition.

DTC - GTL 1-9:

Produce all documents that were used, or relied upon, to creating the chart attached as Appendix IV to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix IV, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Mr. Carver, who did not participate in creating the chart attached as Appendix IV to the Petition.

DTC - GTL 1-10:

Produce all documents that were used, or relied upon, in relation to creating Appendix V to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix V, and identify all individuals who were involved in the creation of Appendix V.

Response:

This request does not apply to Mr. Carver, who did not participate in creating the chart attached as Appendix V to the Petition.

DTC - GTL 1-11:

Produce all documents that were used, or relied upon, in relation to creating the chart attached as Appendix VI to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix VI, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Mr. Carver, who did not participate in creating the chart attached as Appendix VI to the Petition.

DTC - GTL 1-12:

State whether you allege that the telephone rates for in-state and local calls charged by telephone service providers serving Massachusetts correctional facilities violate the Order on Payphone Barriers to Entry & Exit, and OSP Rate Cap issued on or about April 17, 1998 by the Massachusetts Department of Telecommunications and Energy, which was the predecessor agency to the Massachusetts Department of Telecommunications and Cable (the "1998 Order") or any other Massachusetts law or regulation. If your answer is yes to any portion of this request, explain in detail which rates you allege violate the 1998 Order, other law or regulation and how those rates violate the 1998 Order, law or regulation.

Response:

Mr. Carver objects to this request as calling for a legal conclusion. Without waiving this objection, he refers Respondents to the PLS response to this request.

DTC - GTL 1-13:

Produce all documents reflecting all correspondence or communications you have had with a telephone service provider regarding any of the allegations in the Petition in this

proceeding, including in its Amendments, including all billing records, requests for information relating to billing, and complaints regarding quality of service.

Response:

Mr. Carver has no responsive documents in his possession aside from the billing record he has produced.

DTC - GTL 1-14:

For each Petitioner that submitted an affidavit in this proceeding, identify all no statements included in your affidavit that have changed since the time you signed your affidavit or were incorrect at the time of signing and provide a statement in response to this request updating and/or correcting your affidavit.

Response:

No statements included in Mr. Carver's affidavit have changed since the time he signed his affidavit or were incorrect at the time of signing.

DTC - GTL 1-15:

For each Petitioner that did not submit an affidavit in this proceeding, provide a statement in response to this request explaining why you did not submit an affidavit and detailing all issues that you allege support your inclusion as a Petitioner.

Response:

Mr. Carver submitted an affidavit.

DTC - GTL 1-16:

Produce all documents relating to communications with Global Tel*Link or its predecessor relating to any allegations of quality of service or billing issues in relation to telephone calls placed from any Massachusetts correctional facility. If you have no such documents, please state that in writing.

Response:

Mr. Carver has no responsive documents in his possession.

DTC - GTL 1-17:

Produce all documents relating to any communications you have had with the Department of Telecommunications and Cable, any Massachusetts correctional facility, any

other federal, state, county or local agency or official, including the Federal Communications Commission, relating to telephone calls placed by prisoners or inmates at correctional facilities.

Response:

Mr. Carver has no responsive documents in his possession.

Before the
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Petition of Recipients of Collect Calls From Prisoners at Correctional Institutions in Massachusetts Seeking Relief from the Unjust and Unreasonable Cost of Such Calls	)	D.T.C. 11-16

RESPONSE OF JEAN CONTI TO GLOBAL TEL*LINK CORPORATION'S FIRST SET OF INFORMATION REQUESTS TO PETITIONERS

RESPONSES TO INFORMATION REQUESTS

GENERAL OBJECTIONS

General Objections:

1. The Petitioners object to the requirement that each petitioner provide documents and information dating back to 1998. This is overbroad, unduly burdensome and unlikely to lead to the discovery of relevant information.

   Notwithstanding this objection, and without waiving this objection, the Petitioners have provided all responsive documents in their possession.

2. The Petitioners object to these requests insofar as they seek information already in the possession of the Respondents. This is unduly burdensome.

   Notwithstanding this objection, and without waiving this objection, the Petitioners have provided all responsive records and documents in their possession.

   In particular, the Petitioners produce all Inmate Calling Service (ICS) requests for proposals and contracts that were obtained from correctional facilities through requests made under the Massachusetts Public Records Act. The Petitioners do not represent that these documents are complete. Individual petitioners have also produced records relating to their ICS service, but do not represent that these documents are complete, and the absence of such documents for any petitioner should not be interpreted to imply that no such records exist as regards that petitioner.

Responses

DTC - GTL 1-1:

Identify every Petitioner in this action. For each Petitioner that is an entity, provide its physical address, mailing address if different from its physical address, telephone number, and a list of all officers and directors or partners and their titles since January 1, 1998. For each Petitioner who is a natural person, provide that individual's mailing address(es), place(s) of business, telephone number, and any aliases or other names that person has used since January 1, 1998.

Response:

Ms. Conti resides at One Glenwood Avenue, Hyde Park, MA 02136, (617)-361-6253. She has used no aliases.

DTC - GTL 1-2:

For each telephone call that you received from, or placed as, a prisoner or inmate in a Massachusetts correctional facility since January 1, 1998, identify the name of the facility from which the call was placed, the parties to the call, the date and time of the call, the duration of the call, the amount charged for the call, whether the telephone call was placed using a prepaid calling card or as a collect call, the telephone service provider used, and all issues, if any, that you allege affected the quality of the call. Produce all documents, including any billing records or PINs relating to each such call.

Response:

Ms. Conti objects to the request insofar as it requires her to identify each call received since 1998 and provide specific information regarding each call. This request is unduly burdensome.

Without waiving this objection, Ms. Conti states that she received collect and then prepaid debit calls from her son Samuel Conti (also a petitioner) while he was incarcerated at the North Central Correctional Institution (NCCI) in Gardner, MA. Ms. Conti has a call detail summary from Verizon that reflects collect calls from July 21 through September 17 of 2009.

DTC - GTL 1-3:

For each telephone call identified in response to DTC-GTL 1-2 that you allege was of poor quality, identify the alleged quality issues(s) and the cause(s) of the alleged quality issue(s), explain how you determined the cause(s) of the issue(s), and if you placed the call from a correctional facility, describe the telephone equipment you used to place the call, and whether the telephone service provider was contacted about the issue, the date and time of such contact, and all documents supporting such contact.

Response:

Ms. Conti objects to the request insofar as it requires her to identify and describe each call of poor quality since 1998. This request is unduly burdensome.

Without waiving this objection, Ms. Conti states that she did not submit written and verbal complaints to the Department of correction about the terrible sound quality of the collect and debit calls she received. Without waiving this objection, Petitioner Conti states that while her son was incarcerated at NCCI Gardner bad connections regularly deprived her and her son of the ability to hear each other requiring her son to place a subsequent call. Petitioner Conti states further that false three-way detections often resulted in premature call termination requiring her son to place a subsequent call. Petitioner Conti personally witnessed poor sound quality, bad connections and frequent dropped calls, preceded by a recording stating that a three-way call was detected when in fact there was no three-way call in progress. Petitioner Conti is not a telecommunications technician. She determined the phone problems she experienced were due to the provider service based on the fact that poor sound quality, bad connections and dropped calls based on false three-way call detection occurred repeatedly when GTL was the phone service provider.

DTC - GTL 1-4:

For Petitioners who are lawyers, law firms or otherwise provide legal services and that claim they have declined to accept calls placed from Massachusetts correctional facilities, or have limited the acceptance of such calls in any way, identify by date and time each instance in which an incoming call was declined and the individual attempting to place the call, and produce all documents relating to such calls and all any policies or procedures relating to accepting, declining or limiting calls placed from Massachusetts correctional facilities.

Response:

This does not apply to Ms. Conti.

DTC - GTL 1-5:

Identify each Petitioner that has used a prepaid calling card to place or receive a telephone call from a Massachusetts correctional facility and produce all documents relating to such prepaid calling cards or their use, including the PINs associated with those cards or other prepaid card activation and use records.

Response:

Ms. Conti received prepaid calls from her son at NCCI. She has no records in her possession responsive to this request. Ms. Conti has attached a call detail summary from Verizon that reflects collect calls from July 21 through September 17 of 2009.

DTC - GTL 1-6:

Produce all documents relating to per-call surcharges and/or tariffed service or other fees assessed by telephone service providers serving any Massachusetts correctional facility.

Response:

Ms. Conti has a call detail summary from Verizon that reflects collect calls from July 21 through September 17 of 2009.

DTC - GTL 1-7:

Produce all documents that were used or relied upon in relation to creating the chart attached as Appendix II to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix II, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Ms. Conti, who did not participate in creating the chart attached as Appendix II to the Petition.

DTC - GTL 1-8:

Produce all documents that were used, or relied upon, to create Appendix III to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix III, and identify all individuals who were involved in the creation of Appendix III.

Response:

This request does not apply to Ms. Conti, who did not participate in creating the chart attached as Appendix III to the Petition.

DTC - GTL 1-9:

Produce all documents that were used, or relied upon, to creating the chart attached as Appendix IV to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix IV, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Ms. Conti, who did not participate in creating the chart attached as Appendix IV to the Petition.

DTC - GTL 1-10:

Produce all documents that were used, or relied upon, in relation to creating Appendix V to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix V, and identify all individuals who were involved in the creation of Appendix V.

Response:

This request does not apply to Ms. Conti, who did not participate in creating the chart attached as Appendix V to the Petition.

DTC - GTL 1-11:

Produce all documents that were used, or relied upon, in relation to creating the chart attached as Appendix VI to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix VI, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Ms. Conti, who did not participate in creating the chart attached as Appendix VI to the Petition.

DTC - GTL 1-12:

State whether you allege that the telephone rates for in-state and local calls charged by telephone service providers serving Massachusetts correctional facilities violate the Order on Payphone Barriers to Entry & Exit, and OSP Rate Cap issued on or about April 17, 1998 by the Massachusetts Department of Telecommunications and Energy, which was the predecessor agency to the Massachusetts Department of Telecommunications and Cable (the "1998 Order") or any other Massachusetts law or regulation. If your answer is yes to any portion of this request, explain in detail which rates you allege violate the 1998 Order, other law or regulation and how those rates violate the 1998 Order, law or regulation.

Response:

Ms. Conti objects to this request as calling for a legal conclusion. Without waiving this objection, Ms. Conti refers Respondent to the PLS response to this request.

DTC - GTL 1-13:

Produce all documents reflecting all correspondence or communications you have had with a telephone service provider regarding any of the allegations in the Petition in this proceeding, including in its Amendments, including all billing records, requests for information relating to billing, and complaints regarding quality of service.

Response:

Ms. Conti has no responsive documents in her possession.

DTC - GTL 1-14:

For each Petitioner that submitted an affidavit in this proceeding, identify all statements included in your affidavit that have changed since the time you signed your affidavit or were incorrect at the time of signing and provide a statement in response to this request updating and/or correcting your affidavit.

Response:

Ms. Conti did not make any statements in her affidavit that have changed since it was signed. She further incorporates her answer to GTL 1-2.

DTC - GTL 1-15:

For each Petitioner that did not submit an affidavit in this proceeding, provide a statement in response to this request explaining why you did not submit an affidavit and detailing all issues that you allege support your inclusion as a Petitioner.

Response:

Ms. Conti submitted an affidavit.

DTC - GTL 1-16:

Produce all documents relating to communications with Global Tel*Link or its predecessor relating to any allegations of quality of service or billing issues in relation to telephone calls placed from any Massachusetts correctional facility. If you have no such documents, please state that in writing.

Response:

Ms. Conti has no responsive documents in her possession.

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DTC - GTL 1-17:

Produce all documents relating to any communications you have had with the Department of Telecommunications and Cable, any Massachusetts correctional facility, any other federal, state, county or local agency or official, including the Federal Communications Commission, relating to telephone calls placed by prisoners or inmates at correctional facilities.

Response:

Ms. Conti has no responsive documents in her possession.

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Before the
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Petition of Recipients of Collect Calls From Prisoners at Correctional Institutions in Massachusetts Seeking Relief from the Unjust and Unreasonable Cost of Such Calls	)	D.T.C. 11-16

RESPONSE OF KIMBERLY ECKMANN TO GLOBAL TEL*LINK CORPORATION'S FIRST SET OF INFORMATION REQUESTS TO PETITIONERS

RESPONSES TO INFORMATION REQUESTS

GENERAL OBJECTIONS

General Objections:

1. The Petitioners object to the requirement that each petitioner provide documents and information dating back to 1998. This is overbroad, unduly burdensome and unlikely to lead to the discovery of relevant information.

   Notwithstanding this objection, and without waiving this objection, the Petitioners have provided all responsive documents in their possession.

2. The Petitioners object to these requests insofar as they seek information already in the possession of the Respondents. This is unduly burdensome.

   Notwithstanding this objection, and without waiving this objection, the Petitioners have provided all responsive records and documents in their possession.

   In particular, the Petitioners produce all inmate calling service (ICS) requests for proposals and contracts that were obtained from correctional facilities through requests made under the Massachusetts Public Records Act. The Petitioners do not represent that these documents are complete. Individual petitioners have also produced records relating to their ICS service, but do not represent that these documents are complete, and the absence of such documents for any petitioner should not be interpreted to imply that no such records exist as regards that petitioner.

Responses

DTC - GTL 1-1:

Identify every Petitioner in this action. For each Petitioner that is an entity, provide its physical address, mailing address if different from its physical address, telephone number, and a list of all officers and directors or partners and their titles since January 1, 1998. For each Petitioner who is a natural person, provide that individual's mailing address(es), place(s) of business, telephone number, and any aliases or other names that person has used since January 1, 1998.

Response:

Ms. Eckmann currently resides at 38 Essex Road, Ipswich, MA 01938-2532, 978-790-0982. She has used no aliases.

DTC - GTL 1-2:

For each telephone call that you received from, or placed as, a prisoner or inmate in a Massachusetts correctional facility since January 1, 1998, identify the name of the facility from which the call was placed, the parties to the call, the date and time of the call, the duration of the call, the amount charged for the call, whether the telephone call was placed using a prepaid calling card or as a collect call, the telephone service provider used, and all issues, if any, that you allege affected the quality of the call. Produce all documents, including any billing records or PINs relating to each such call.

Response:

Ms. Eckmann objects to the request insofar as it requires her to identify each call received since 1998 and provide specific information regarding each call. This request is unduly burdensome.

Without waiving this objection, Ms. Eckmann states that she received collect and prepaid calls from James Carver (also a petitioner) that she paid for and has some records of the calls made while her loved one was in prison. Ms. Eckmann has provided statements covering the period from September 22, 2013 through February 19, 2014 and Verizon itemized calls for the periods of August 21 through September 5 of 2013, October 11 through November 7 of 2013, December 6 through December 19 of 2013, as well as for July 25, 2013 and October 13, 2013.

DTC - GTL 1-3:

For each telephone call identified in response to DTC-GTL 1-2 that you allege was of poor quality, identify the alleged quality issues(s) and the cause(s) of the alleged quality issue(s), explain how you determined the cause(s) of the issue(s), and if you placed the call from a correctional facility, describe the telephone equipment you used to place the call, and whether the telephone service provider was contacted about the issue, the date and time of such contact, and all documents supporting such contact.

Response:

Ms. Eckmann objects to the request insofar as it requires her to identify and describe each call of poor quality. This request is unduly burdensome.

Without waiving this objection, Ms. Eckmann states that she submitted no written complaints about the many dropped calls, inaudible calls, and charges for calls that had not been accepted. Ms. Eckmann does not have records of other complaints in her possession. Petitioner Eckmann stands on the facts set forth in her affidavit regarding poor line quality, bad connections, and inaudible and dropped calls all necessitating subsequent calls and related charges and fees. Petitioner Eckmann is not a telecommunications technician. She determined that the poor quality of service was due to the provider based on the fact that the poor sound quality, bad connections and dropped calls from false three-way call detection occurred repeatedly when GTL was the phone service provider.

DTC - GTL 1-4:

For Petitioners who are lawyers, law firms or otherwise provide legal services and that claim they have declined to accept calls placed from Massachusetts correctional facilities, or have limited the acceptance of such calls in any way, identify by date and time each instance in which an incoming call was declined and the individual attempting to place the call, and produce all documents relating to such calls and all any policies or procedures relating to accepting, declining or limiting calls placed from Massachusetts correctional facilities.

Response:

This does not apply to Ms. Eckmann.

DTC - GTL 1-5:

Identify each Petitioner that has used a prepaid calling card to place or receive a telephone call from a Massachusetts correctional facility and produce all documents relating to such prepaid calling cards or their use, including the PINs associated with those cards or other prepaid card activation and use records.

Response:

Ms. Eckmann received and paid for collect and pre-paid calls from James Carver who is still incarcerated. Aside from the records already provided, Ms. Eckmann has no further responsive information or documents for this request.

DTC - GTL 1-6:

Produce all documents relating to per-call surcharges and/or tariffed service or other fees assessed by telephone service providers serving any Massachusetts correctional facility.

Response:

Other than the records already provided, Ms. Eckmann has no further responsive documents in her possession.

DTC - GTL 1-7:

Produce all documents that were used or relied upon in relation to creating the chart attached as Appendix II to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix II, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Ms. Eckmann, who did not participate in creating the chart attached as Appendix II to the Petition.

DTC - GTL 1-8:

Produce all documents that were used, or relied upon, to create Appendix III to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix III, and identify all individuals who were involved in the creation of Appendix III.

Response:

This request does not apply to Ms. Eckmann, who did not participate in creating the chart attached as Appendix III to the Petition.

DTC - GTL 1-9:

Produce all documents that were used, or relied upon, to create the chart attached as Appendix IV to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix IV, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Ms. Eckmann , who did not participate in creating the chart attached as Appendix IV to the Petition.

DTC - GTL 1-10:

Produce all documents that were used, or relied upon, in relation to creating Appendix V to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix V, and identify all individuals who were involved in the creation of Appendix V.

Response:

This request does not apply to Ms. Eckmann , who did not participate in creating the chart attached as Appendix V to the Petition.

DTC - GTL 1-11:

Produce all documents that were used, or relied upon, in relation to creating the chart attached as Appendix VI to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix VI, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Ms. Eckmann , who did not participate in creating the chart attached as Appendix VI to the Petition.

DTC - GTL 1-12:

State whether you allege that the telephone rates for in-state and local calls charged by telephone service providers serving Massachusetts correctional facilities violate the Order on Payphone Barriers to Entry & Exit, and OSP Rate Cap issued on or about April 17, 1998 by the Massachusetts Department of Telecommunications and Energy, which was the predecessor agency to the Massachusetts Department of Telecommunications and Cable (the "1998 Order") or any other Massachusetts law or regulation. If your answer is yes to any portion of this request, explain in detail which rates you allege violate the 1998 Order, other law or regulation and how those rates violate the 1998 Order, law or regulation.

Response:

Ms. Eckmann objects to this request as calling for a legal conclusion. Without waiving this objection, Ms. Eckman refers Respondent to the PLS response to this request.

DTC - GTL 1-13:

Produce all documents reflecting all correspondence or communications you have had with a telephone service provider regarding any of the allegations in the Petition in this proceeding, including in its Amendments, including all billing records, requests for information relating to billing, and complaints regarding quality of service.

Response:

Ms. Eckmann has no responsive documents in her possession.

DTC - GTL 1-14:

For each Petitioner that submitted an affidavit in this proceeding, identify all statements included in your affidavit that have changed since the time you signed your affidavit or were incorrect at the time of signing and provide a statement in response to this request updating and/or correcting your affidavit.

Response:

Ms. Eckmann has no updates or corrections to her affidavit other than the addition of the statements made in her previous GTL responses regarding quality of service.

DTC - GTL 1-15:

For each Petitioner that did not submit an affidavit in this proceeding, provide a statement in response to this request explaining why you did not submit an affidavit and detailing all issues that you allege support your inclusion as a Petitioner.

Response:

Ms. Eckmann did submit an affidavit in this proceeding.

DTC - GTL 1-16:

Produce all documents relating to communications with Global Tel*Link or its predecessor relating to any allegations of quality of service or billing issues in relation to telephone calls placed from any Massachusetts correctional facility. If you have no such documents, please state that in writing.

Response:

Ms. Eckmann has no responsive documents in her possession.

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DTC - GTL 1-17:

Produce all documents relating to any communications you have had with the Department of Telecommunications and Cable, any Massachusetts correctional facility, any other federal, state, county or local agency or official, including the Federal Communications Commission, relating to telephone calls placed by prisoners or inmates at correctional facilities.

Response:

Ms. Eckmann has no responsive documents in her possession.

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Before the
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Petition of Recipients of Collect Calls From Prisoners at Correctional Institutions in Massachusetts Seeking Relief from the Unjust and Unreasonable Cost of Such Calls	)	D.T.C. 11-16

RESPONSE OF LULA BOZEMAN TO GLOBAL TEL*LINK CORPORATION'S FIRST SET OF INFORMATION REQUESTS TO PETITIONERS

RESPONSES TO INFORMATION REQUESTS

GENERAL OBJECTIONS

General Objections:

1. The Petitioners object to the requirement that each petitioner provide documents and information dating back to 1998. This is overbroad, unduly burdensome and unlikely to lead to the discovery of relevant information.

   Notwithstanding this objection, and without waiving this objection, the Petitioners have provided all responsive documents in their possession.

2. The Petitioners object to these requests insofar as they seek information already in the possession of the Respondent. This is unduly burdensome.

   Notwithstanding this objection, and without waiving this objection, the Petitioners have provided all responsive records and documents in their possession.

   In particular, the Petitioners produce all inmate calling service (ICS) requests for proposals and contracts that were obtained from correctional facilities through requests made under the Massachusetts Public Records Act. The Petitioners do not represent that these documents are complete. Individual petitioners have also produced records relating to their ICS service, but do not represent that these documents are complete, and the absence of such documents for any petitioner should not be interpreted to imply that no such records exist as regards that petitioner.

Responses

DTC - GTL 1-1:

Identify every Petitioner in this action. For each Petitioner that is an entity, provide its physical address, mailing address if different from its physical address, telephone number, and a list of all officers and directors or partners and their titles since January 1, 1998. For each Petitioner who is a natural person, provide that individual's mailing address(es), place(s) of business, telephone number, and any aliases or other names that person has used since January 1, 1998.

Response:

Petitioner Lula Bozeman currently resides at 49 Withington Street, Dorchester, MA 02124, 617-265-7659 and has resided at this address from 1998 until present. She has used no aliases.

DTC - GTL 1-2:

For each telephone call that you received from, or placed as, a prisoner or inmate in a Massachusetts correctional facility since January 1, 1998, identify the name of the facility from which the call was placed, the parties to the call, the date and time of the call, the duration of the call, the amount charged for the call, whether the telephone call was placed using a prepaid calling card or as a collect call, the telephone service provider used, and all issues, if any, that you allege affected the quality of the call. Produce all documents, including any billing records or PINs relating to each such call.

Response:

Petitioner Lula Bozeman objects to the request insofar as it requires her to identify each call received since 1998 and provide specific information regarding each call. This request is unduly burdensome.

Without waiving this objection, Petitioner Lula Bozeman states that she received collect calls, connected by Securus, from her son approximately four to seven times per week while he was incarcerated at the Suffolk County House of Correction (SCHOC) from approximately June 2007 until about December 16, 2009. She has attached Verizon billing records for the following billing dates: June 12, 2007; November 12, 2007; March 12, 2008; May 12, 2008; and February 12, 2009. Petitioner Lula Bozeman does not have any more documents responsive to this request in her possession.

DTC - GTL 1-3:

For each telephone call identified in response to DTC-GTL 1-2 that you allege was of poor quality, identify the alleged quality issues(s) and the cause(s) of the alleged quality issue(s), explain how you determined the cause(s) of the issue(s), and if you placed the call from a

correctional facility, describe the telephone equipment you used to place the call, and whether the telephone service provider was contacted about the issue, the date and time of such contact, and all documents supporting such contact.

Response:

Petitioner Lula Bozeman objects to this request insofar as it requires her to identify and describe each call of poor quality during her son's ten years in custody. This request is unduly burdensome.

Without waiving this objection, Petitioner Lula Bozeman states that throughout the approximately 28 months her son was incarcerated at the SHOC: bad connections regularly deprived her and her son of the ability to hear each other requiring her son to place a subsequent call. Petitioner Lula Bozeman states further that false three-way detections often resulted in premature call termination requiring her son to place a subsequent call. Petitioner Lula Bozeman personally witnessed poor sound quality, bad connections and frequent dropped calls, preceded by a recording stating that a three-way call was detected, when in fact there was no three-way call in progress. Ms. Bozeman is not a telecommunications technician. She determined this based on the fact that poor sound quality, bad connections and dropped calls from three-way call detection occurred repeatedly when Securus was the phone service provider.

DTC - GTL 1-4:

For Petitioners who are lawyers, law firms or otherwise provide legal services and that claim they have declined to accept calls placed from Massachusetts correctional facilities, or have limited the acceptance of such calls in any way, identify by date and time each instance in which an incoming call was declined and the individual attempting to place the call, and produce all documents relating to such calls and all any policies or procedures relating to accepting, declining or limiting calls placed from Massachusetts correctional facilities.

Response:

This does not apply to Petitioner Lula Bozeman.

DTC - GTL 1-5:

Identify each Petitioner that has used a prepaid calling card to place or receive a telephone call from a Massachusetts correctional facility and produce all documents relating to such prepaid calling cards or their use, including the PINs associated with those cards or other prepaid card activation and use records.

Response:

Petitioner Lula Bozeman received collect calls from her son who was incarcerated at the SCHOC from on or about June 2007 through December 2009. She has attached Verizon billing records for the following billing dates: June 12, 2007; November 12, 2007; March 12, 2008; May 12, 2008; and February 12, 2009. She has no other documents in her possession that are responsive to this request.

DTC - GTL 1-6:

Produce all documents relating to per-call surcharges and/or tariffed service or other fees assessed by telephone service providers serving any Massachusetts correctional facility.

Response:

Petitioner Lula Bozeman has attached Verizon billing records for the following billing dates: June 12, 2007; November 12, 2007; March 12, 2008; May 12, 2008; and February 12, 2009. She has no other documents in her possession that are responsive to this request.

DTC - GTL 1-7:

Produce all documents that were used or relied upon in relation to creating the chart attached as Appendix II to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix II, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Petitioner Lula Bozeman, who did not participate in creating the chart attached as Appendix II to the Petition.

DTC - GTL 1-8:

Produce all documents that were used, or relied upon, to create Appendix III to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix III, and identify all individuals who were involved in the creation of Appendix III.

Response:

This request does not apply to Petitioner Lula Bozeman, who did not participate in creating the chart attached as Appendix III to the Petition.

DTC - GTL 1-9:

Produce all documents that were used, or relied upon, to creating the chart attached as Appendix IV to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix IV, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Petitioner Lula Bozeman, who did not participate in creating the chart attached as Appendix IV to the Petition.

DTC - GTL 1-10:

Produce all documents that were used, or relied upon, in relation to creating Appendix V to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix V, and identify all individuals who were involved in the creation of Appendix V.

Response:

This request does not apply to Petitioner Lula Bozeman, who did not participate in creating the chart attached as Appendix V to the Petition.

DTC - GTL 1-11:

Produce all documents that were used, or relied upon, in relation to creating the chart attached as Appendix VI to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix VI, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Petitioner Lula Bozeman, who did not participate in creating the chart attached as Appendix VI to the Petition.

DTC - GTL 1-12:

State whether you allege that the telephone rates for in-state and local calls charged by telephone service providers serving Massachusetts correctional facilities violate the Order on Payphone Barriers to Entry & Exit, and OSP Rate Cap issued on or about April 17, 1998 by the Massachusetts Department of Telecommunications and Energy, which was the predecessor agency to the Massachusetts Department of Telecommunications and Cable (the "1998 Order") or any other Massachusetts law or regulation. If your answer is yes to any portion of this

request, explain in detail which rates you allege violate the 1998 Order, other law or regulation and how those rates violate the 1998 Order, law or regulation.

Response:

Ms. Bozeman objects to this request as calling for a legal conclusion. Without waiving this objection, the Petitioner refers Respondent to the PLS response to this request.

DTC - GTL 1-13:

Produce all documents reflecting all correspondence or communications you have had with a telephone service provider regarding any of the allegations in the Petition in this proceeding, including in its Amendments, including all billing records, requests for information relating to billing, and complaints regarding quality of service.

Response:

Petitioner Lula Bozeman has no responsive documents in her possession.

DTC - GTL 1-14:

For each Petitioner that submitted an affidavit in this proceeding, identify all statements included in your affidavit that have changed since the time you signed your affidavit or were incorrect at the time of signing and provide a statement in response to this request updating and/or correcting your affidavit.

Response:

Petitioner Lula Bozeman stands by the facts as stated at the time she signed her affidavit with the exception that upon review of the billing records in her possession she began receiving collect calls in at least as early as June of 2007 and not June of 2008.

DTC - GTL 1-15:

For each Petitioner that did not submit an affidavit in this proceeding, provide a statement in response to this request explaining why you did not submit an affidavit and detailing all issues that you allege support your inclusion as a Petitioner.

Response:

This request does not apply to Petitioner Lula Bozeman.

DTC - GTL 1-16:

Produce all documents relating to communications with Global Tel*Link or its predecessor relating to any allegations of quality of service or billing issues in relation to

telephone calls placed from any Massachusetts correctional facility. If you have no such documents, please state that in writing.

Response:

Petitioner Lula Bozeman has no responsive documents in her possession.

DTC - GTL 1-17:

Produce all documents relating to any communications you have had with the Department of Telecommunications and Cable, any Massachusetts correctional facility, any other federal, state, county or local agency or official, including the Federal Communications Commission, relating to telephone calls placed by prisoners or inmates at correctional facilities.

Response:

Petitioner Lula Bozeman has no responsive documents in her possession.

Before the
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Petition of Recipients of Collect Calls From Prisoners at Correctional Institutions in Massachusetts Seeking Relief from the Unjust and Unreasonable Cost of Such Calls	)	D.T.C. 11-16

RESPONSE OF PATRICIA GONET TO GLOBAL TEL*LINK CORPORATION'S FIRST SET OF INFORMATION REQUESTS TO PETITIONERS

RESPONSES TO INFORMATION REQUESTS

GENERAL OBJECTIONS

General Objections:

1. The Petitioners object to the requirement that each petitioner provide documents and information dating back to 1998. This is overbroad, unduly burdensome and unlikely to lead to the discovery of relevant information.

   Notwithstanding this objection, and without waiving this objection, the Petitioners have provided all responsive documents in their possession.

2. The Petitioners object to these requests insofar as they seek information already in the possession of the Respondents. This is unduly burdensome.

   Notwithstanding this objection, and without waiving this objection, the Petitioners have provided all responsive records and documents in their possession.

   In particular, the Petitioners produce all inmate calling service (ICS) requests for proposals and contracts that were obtained from correctional facilities through requests made under the Massachusetts Public Records Act. The Petitioners do not represent that these documents are complete. Individual petitioners have also produced records relating to their ICS service, but do not represent that these documents are complete, and the absence of such documents for any petitioner should not be interpreted to imply that no such records exist as regards that petitioner.

Responses

DTC - GTL 1-1:

Identify every Petitioner in this action. For each Petitioner that is an entity, provide its physical address, mailing address if different from its physical address, telephone number, and a list of all officers and directors or partners and their titles since January 1, 1998. For each Petitioner who is a natural person, provide that individual's mailing address(es), place(s) of business, telephone number, and any aliases or other names that person has used since January 1, 1998.

Response:

Petitioner Patricia Gonet currently resides at 11 Emerald Dr. Dartmouth, MA 02747, (508)-999-4327 and has resided at this address from 1998 until present. She has used no aliases.

DTC - GTL 1-2:

For each telephone call that you received from, or placed as, a prisoner or inmate in a Massachusetts correctional facility since January 1, 1998, identify the name of the facility from which the call was placed, the parties to the call, the date and time of the call, the duration of the call, the amount charged for the call, whether the telephone call was placed using a prepaid calling card or as a collect call, the telephone service provider used, and all issues, if any, that you allege affected the quality of the call. Produce all documents, including any billing records or PINs relating to each such call.

Response:

Petitioner Patricia Gonet objects to the request insofar as it requires her to identify each call received since 1998 and provide specific information regarding each call. This request is unduly burdensome.

Without waiving this objection, Petitioner Patricia Gonet states that she prepaid Evercom in order to receive collect calls that her son Daniel Gonet made approximately once a week from the Bristol County Jail and House of Correction (BCJ & HOC) in North Dartmouth, MA. Petitioner Patricia Gonet has attached a USAA Savings Bank Credit Card Statement dated September 11, 2009, showing $106.95 in charges and fees that she paid to Evercom via Correctional Billing Services for telephone service. She does not have any other documents responsive to this request in her possession.

DTC - GTL 1-3:

For each telephone call identified in response to DTC-GTL 1-2 that you allege was of poor quality, identify the alleged quality issues(s) and the cause(s) of the alleged quality issue(s), explain how you determined the cause(s) of the issue(s), and if you placed the call from a correctional facility, describe the telephone equipment you used to place the call, and whether

the telephone service provider was contacted about the issue, the date and time of such contact, and all documents supporting such contact.

Response:

Petitioner Patricia Gonet objects to this request insofar as it requires her to identify and describe each call of poor quality since 1998. This request is unduly burdensome.

Without waiving this objection, Petitioner Patricia Gonet states that throughout her son's incarceration at the BCJ & HOC bad connections regularly deprived her and her son of the ability to hear each other requiring her son to place a subsequent call and incur new surcharges. Petitioner Patricia Gonet states further that she personally witnessed poor sound quality and bad connections. Ms. Gonet is not a telecommunications technician. She determined this based on the fact that: poor sound quality and bad connections occurred repeatedly when Evercom was the phone service provider.

DTC - GTL 1-4:

For Petitioners who are lawyers, law firms or otherwise provide legal services and that claim they have declined to accept calls placed from Massachusetts correctional facilities, or have limited the acceptance of such calls in any way, identify by date and time each instance in which an incoming call was declined and the individual attempting to place the call, and produce all documents relating to such calls and all any policies or procedures relating to accepting, declining or limiting calls placed from Massachusetts correctional facilities.

Response:

This does not apply to Petitioner Patricia Gonet

DTC - GTL 1-5:

Identify each Petitioner that has used a prepaid calling card to place or receive a telephone call from a Massachusetts correctional facility and produce all documents relating to such prepaid calling cards or their use, including the PINs associated with those cards or other prepaid card activation and use records.

Response:

Petitioner Patricia Gonet received collect calls from her son who was incarcerated at the BCJ & HOC. She attached a USAA Savings Bank Credit Card Statement dated September 11, 2009, showing $106.95 in charges and fees that she paid to Evercom via Correctional Billing Services for telephone service. She does not have any more documents responsive to this request in her possession.

DTC - GTL 1-6:

Produce all documents relating to per-call surcharges and/or tariffed service or other fees assessed by telephone service providers serving any Massachusetts correctional facility.

Response:

Petitioner Patricia Gonet has attached a USAA Savings Bank Credit Card Statement dated September 11, 2009, showing $106.95 in charges and fees that she paid to Evercom via Correctional Billing Services for telephone service. She does not have any more documents responsive to this request in her possession.

DTC - GTL 1-7:

Produce all documents that were used or relied upon in relation to creating the chart attached as Appendix II to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix II, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Petitioner Patricia Gonet, who did not participate in creating the chart attached as Appendix II to the Petition.

DTC - GTL 1-8:

Produce all documents that were used, or relied upon, to create Appendix III to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix III, and identify all individuals who were involved in the creation of Appendix III.

Response:

This request does not apply to Petitioner Patricia Gonet, who did not participate in creating the chart attached as Appendix III to the Petition.

DTC - GTL 1-9:

Produce all documents that were used, or relied upon, to creating the chart attached as Appendix IV to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix IV, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Petitioner Patricia Gonet, who did not participate in creating the chart attached as Appendix IV to the Petition.

DTC - GTL 1-10:

Produce all documents that were used, or relied upon, in relation to creating Appendix V to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix V, and identify all individuals who were involved in the creation of Appendix V.

Response:

This request does not apply to Petitioner Patricia Gonet, who did not participate in creating the chart attached as Appendix V to the Petition.

DTC - GTL 1-11:

Produce all documents that were used, or relied upon, in relation to creating the chart attached as Appendix VI to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix VI, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Petitioner Patricia Gonet, who did not participate in creating the chart attached as Appendix VI to the Petition.

DTC - GTL 1-12:

State whether you allege that the telephone rates for in-state and local calls charged by telephone service providers serving Massachusetts correctional facilities violate the Order on Payphone Barriers to Entry & Exit, and OSP Rate Cap issued on or about April 17, 1998 by the Massachusetts Department of Telecommunications and Energy, which was the predecessor agency to the Massachusetts Department of Telecommunications and Cable (the "1998 Order") or any other Massachusetts law or regulation. If your answer is yes to any portion of this request, explain in detail which rates you allege violate the 1998 Order, other law or regulation and how those rates violate the 1998 Order, law or regulation.

Response:

Ms. Gonet objects to this request as calling for a legal conclusion. Without waiving this objection, she refers Respondent to the PLS response to this request.

DTC - GTL 1-13:

Produce all documents reflecting all correspondence or communications you have had with a telephone service provider regarding any of the allegations in the Petition in this proceeding, including in its Amendments, including all billing records, requests for information relating to billing, and complaints regarding quality of service.

Response:

Petitioner Patricia Gonet has no responsive documents in her possession.

DTC - GTL 1-14:

For each Petitioner that submitted an affidavit in this proceeding, identify all statements included in your affidavit that have changed since the time you signed your affidavit or were incorrect at the time of signing and provide a statement in response to this request updating and/or correcting your affidavit.

Response:

Petitioner Patricia Gonet stands by the facts as stated at the time she signed her affidavit.

DTC - GTL 1-15:

For each Petitioner that did not submit an affidavit in this proceeding, provide a statement in response to this request explaining why you did not submit an affidavit and detailing all issues that you allege support your inclusion as a Petitioner.

Response:

This request does not apply to Petitioner Ms. Gonet.

DTC - GTL 1-16:

Produce all documents relating to communications with Global Tel*Link or its predecessor relating to any allegations of quality of service or billing issues in relation to telephone calls placed from any Massachusetts correctional facility. If you have no such documents, please state that in writing.

Response:

Petitioner Patricia Gonet stands by the facts as stated at the time she signed her affidavit and in her response to GTL 1-2. She has no other responsive documents in her possession.

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DTC - GTL 1-17:

Produce all documents relating to any communications you have had with the Department of Telecommunications and Cable, any Massachusetts correctional facility, any other federal, state, county or local agency or official, including the Federal Communications Commission, relating to telephone calls placed by prisoners or inmates at correctional facilities.

Response:

Petitioner Patricia Gonet has no such responsive documents in her possession.

Chapter 700-701

Disciplinary Hearing Instructions For State Prisoners (English) (Approved)

Keywords: D-hearing; d-ticket; instructions; English; 0701dhg1.L2X

Last modified by: Lauren Petit/MCLS on 03/05/2012

Before the
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Petition of Recipients of Collect Calls From Prisoners at Correctional Institutions in Massachusetts Seeking Relief from the Unjust and Unreasonable Cost of Such Calls	)	D.T.C. 11-16

RESPONSE OF SONIA BOOKER TO GLOBAL TEL*LINK CORPORATION'S FIRST SET OF INFORMATION REQUESTS TO PETITIONERS

RESPONSES TO INFORMATION REQUESTS

GENERAL OBJECTIONS

General Objections:

1. The Petitioners object to the requirement that each petitioner provide documents and information dating back to 1998. This is overbroad, unduly burdensome and unlikely to lead to the discovery of relevant information.

   Notwithstanding this objection, and without waiving this objection, the Petitioners have provided all responsive documents in their possession.

2. The Petitioners object to these requests insofar as they seek information already in the possession of the Securus. This is unduly burdensome.

   Notwithstanding this objection, and without waiving this objection, the Petitioners have provided all responsive records and documents in their possession.

   In particular, the Petitioners produce all inmate calling service (ICS) requests for proposals and contracts that were obtained from correctional facilities through requests made under the Massachusetts Public Records Act. The Petitioners do not represent that these documents are complete. Individual petitioners have also produced records relating to their ICS service, but do not represent that these documents are complete, and the absence of such documents for any petitioner should not be interpreted to imply that no such records exist as regards that petitioner.

Responses

DTC - GTL 1-1:

Identify every Petitioner in this action. For each Petitioner that is an entity, provide its physical address, mailing address if different from its physical address, telephone number, and a list of all officers and directors or partners and their titles since January 1, 1998. For each Petitioner who is a natural person, provide that individual's mailing address(es), place(s) of business, telephone number, and any aliases or other names that person has used since January 1, 1998.

Response:

Petitioner Sonia Booker currently resides at 214 Harvard Street # 3A, Dorchester, MA 02124, 617-288-9839 and has resided at this address from 1998 until present. She has used no aliases.

DTC - GTL 1-2:

For each telephone call that you received from, or placed as, a prisoner or inmate in a Massachusetts correctional facility since January 1, 1998, identify the name of the facility from which the call was placed, the parties to the call, the date and time of the call, the duration of the call, the amount charged for the call, whether the telephone call was placed using a prepaid calling card or as a collect call, the telephone service provider used, and all issues, if any, that you allege affected the quality of the call. Produce all documents, including any billing records or PINs relating to each such call.

Response:

Petitioner Sonia Booker objects to the request insofar as it requires her to identify each call received over her loved one's incarceration and provide specific information regarding each call. This request is unduly burdensome.

Without waiving this objection, Petitioner Sonia Booker states that from on or about March 10, 2008 through March 31, 2010 she received collect and prepaid calls, from her loved one connected by Evercom or an affiliate. She has attached Western Union Customer Receipts for the period beginning April 22, 2008 through February 3, 2010 for money she paid to T Netix a subsidiary of Evercom/Securus Technologies Inc. Petitioner Sonia Booker does not have any other responsive documents to this request in her possession.

DTC - GTL 1-3:

For each telephone call identified in response to DTC-GTL 1-2 that you allege was of poor quality, identify the alleged quality issues(s) and the cause(s) of the alleged quality issue(s), explain how you determined the cause(s) of the issue(s), and if you placed the call from a correctional facility, describe the telephone equipment you used to place the call, and whether

the telephone service provider was contacted about the issue, the date and time of such contact, and all documents supporting such contact.

Response:

Petitioner Sonia Booker objects to this request insofar as it requires her to identify and describe each call of poor quality during her son's ten years in custody. This request is unduly burdensome.

Without waiving this objection, Petitioner Sonia Booker states that bad connections regularly deprived her and her loved one of the ability to hear each other and together with false three-way call detection required her loved one to place subsequent calls generating additional charges that Petitioner Sonia Booker paid for. Petitioner Sonia Booker personally witnessed poor sound quality, bad connections and frequent dropped calls, preceded by a recording stating that a three-way call was detected when in fact there was no three-way call in progress. Ms. Sonia Booker is not a telecommunications technician. She determined this issues were due to the provider's poor service based on the fact that poor sound quality, bad connections and dropped calls from false three-way call detection occurred repeatedly when Evercom was the phone service provider.

DTC - GTL 1-4:

For Petitioners who are lawyers, law firms or otherwise provide legal services and that claim they have declined to accept calls placed from Massachusetts correctional facilities, or have limited the acceptance of such calls in any way, identify by date and time each instance in which an incoming call was declined and the individual attempting to place the call, and produce all documents relating to such calls and all any policies or procedures relating to accepting, declining or limiting calls placed from Massachusetts correctional facilities.

Response:

This does not apply to Petitioner Sonia Booker.

DTC - GTL 1-5:

Identify each Petitioner that has used a prepaid calling card to place or receive a telephone call from a Massachusetts correctional facility and produce all documents relating to such prepaid calling cards or their use, including the PINs associated with those cards or other prepaid card activation and use records.

Response:

Petitioner Sonia Booker has attached Western Union Customer Receipts for the period beginning April 22, 2008 through February 3, 2010 for money she paid to T Netix a subsidiary of Evercom/Securus Technologies Inc. Petitioner Sonia Booker does not have any other documents responsive to this request in her possession.

DTC - GTL 1-6:

Produce all documents relating to per-call surcharges and/or tariffed service or other fees assessed by telephone service providers serving any Massachusetts correctional facility.

Response:

Petitioner Sonia Booker has attached Western Union Customer Receipts for the period beginning April 22, 2008 through February 3, 2010 for money she paid to T Netix a subsidiary of Evercom /Securus Technologies Inc. Petitioner Sonia Booker does not have any other documents responsive to this request in her possession.

DTC - GTL 1-7:

Produce all documents that were used or relied upon in relation to creating the chart attached as Appendix II to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix II, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Petitioner Sonia Booker, who did not participate in creating the chart attached as Appendix II to the Petition.

DTC - GTL 1-8:

Produce all documents that were used, or relied upon, to create Appendix III to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix III, and identify all individuals who were involved in the creation of Appendix III.

Response:

This request does not apply to Petitioner Sonia Booker, who did not participate in creating the chart attached as Appendix III to the Petition.

DTC - GTL 1-9:

Produce all documents that were used, or relied upon, to creating the chart attached as Appendix IV to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix IV, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Petitioner Sonia Booker, who did not participate in creating the chart attached as Appendix IV to the Petition.

DTC - GTL 1-10:

Produce all documents that were used, or relied upon, in relation to creating Appendix V to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix V, and identify all individuals who were involved in the creation of Appendix V.

Response:

This request does not apply to Petitioner Sonia Booker, who did not participate in creating the chart attached as Appendix V to the Petition.

DTC - GTL 1-11:

Produce all documents that were used, or relied upon, in relation to creating the chart attached as Appendix VI to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix VI, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Petitioner Sonia Booker, who did not participate in creating the chart attached as Appendix VI to the Petition.

DTC - GTL 1-12:

State whether you allege that the telephone rates for in-state and local calls charged by telephone service providers serving Massachusetts correctional facilities violate the Order on Payphone Barriers to Entry & Exit, and OSP Rate Cap issued on or about April 17, 1998 by the Massachusetts Department of Telecommunications and Energy, which was the predecessor agency to the Massachusetts Department of Telecommunications and Cable (the "1998 Order") or any other Massachusetts law or regulation. If your answer is yes to any portion of this

request, explain in detail which rates you allege violate the 1998 Order, other law or regulation and how those rates violate the 1998 Order, law or regulation.

Response:

Ms. Booker objects to this request as calling for a legal conclusion. Without waiving this objection, she refers the Respondent to the PLS response this request.

DTC - GTL 1-13:

Produce all documents reflecting all correspondence or communications you have had with a telephone service provider regarding any of the allegations in the Petition in this proceeding, including in its Amendments, including all billing records, requests for information relating to billing, and complaints regarding quality of service.

Response:

Petitioner Sonia Booker has no responsive documents in her possession.

DTC - GTL 1-14:

For each Petitioner that submitted an affidavit in this proceeding, identify all statements included in your affidavit that have changed since the time you signed your affidavit or were incorrect at the time of signing and provide a statement in response to this request updating and/or correcting your affidavit.

Response:

Petitioner Sonia Booker stands by the facts as stated at the time she signed her affidavit and incorporates her previous answers to GTL's requests regarding quality of service.

DTC - GTL 1-15:

For each Petitioner that did not submit an affidavit in this proceeding, provide a statement in response to this request explaining why you did not submit an affidavit and detailing all issues that you allege support your inclusion as a Petitioner.

Response:

This request does not apply to Petitioner Sonia Booker.

DTC - GTL 1-16:

Produce all documents relating to communications with Global Tel*Link or its predecessor relating to any allegations of quality of service or billing issues in relation to telephone calls placed from any Massachusetts correctional facility. If you have no such documents, please state that in writing.

Response:

Petitioner Sonia Booker has no responsive documents in her possession.

DTC - GTL 1-17:

Produce all documents relating to any communications you have had with the Department of Telecommunications and Cable, any Massachusetts correctional facility, any other federal, state, county or local agency or official, including the Federal Communications Commission, relating to telephone calls placed by prisoners or inmates at correctional facilities.

Response:

Petitioner Sonia Booker has no responsive documents in her possession.

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Before the
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Petition of Recipients of Collect Calls From Prisoners at Correctional Institutions in Massachusetts Seeking Relief from the Unjust and Unreasonable Cost of Such Calls	)	D.T.C. 11-16

RESPONSE OF VIRGINIA POLK TO GLOBAL TEL*LINK CORPORATION'S FIRST SET OF INFORMATION REQUESTS TO PETITIONERS

RESPONSES TO INFORMATION REQUESTS

GENERAL OBJECTIONS

General Objections:

1. The Petitioners object to the requirement that each petitioner provide documents and information dating back to 1998. This is overbroad, unduly burdensome and unlikely to lead to the discovery of relevant information.

   Notwithstanding this objection, and without waiving this objection, the Petitioners have provided all responsive documents in their possession.

2. The Petitioners object to these requests insofar as they seek information already in the possession of the Respondents. This is unduly burdensome.

   Notwithstanding this objection, and without waiving this objection, the Petitioners have provided all responsive records and documents in their possession.

   In particular, the Petitioners produce all inmate calling service (ICS) requests for proposals and contracts that were obtained from correctional facilities through requests made under the Massachusetts Public Records Act. The Petitioners do not represent that these documents are complete. Individual petitioners have also produced records relating to their ICS service, but do not represent that these documents are complete, and the absence of such documents for any petitioner should not be interpreted to imply that no such records exist as regards that petitioner.

Responses

DTC - GTL 1-1:

Identify every Petitioner in this action. For each Petitioner that is an entity, provide its physical address, mailing address if different from its physical address, telephone number, and a list of all officers and directors or partners and their titles since January 1, 1998. For each Petitioner who is a natural person, provide that individual's mailing address(es), place(s) of business, telephone number, and any aliases or other names that person has used since January 1, 1998.

Response:

Petitioner Virginia Polk currently resides at 7 Sesame Street, Dracut, MA 01826, 978-458-0895 and resided at this address from 1998 until present. She has used no aliases.

DTC - GTL 1-2:

For each telephone call that you received from, or placed as, a prisoner or inmate in a Massachusetts correctional facility since January 1, 1998, identify the name of the facility from which the call was placed, the parties to the call, the date and time of the call, the duration of the call, the amount charged for the call, whether the telephone call was placed using a prepaid calling card or as a collect call, the telephone service provider used, and all issues, if any, that you allege affected the quality of the call. Produce all documents, including any billing records or PINs relating to each such call.

Response:

Petitioner Virginia Polk objects to the request insofar as it requires her to identify each call received since 1998 and provide specific information regarding each call. This request is unduly burdensome.

Without waiving this objection, Petitioner Virginia Polk states that she paid for calls from her incarcerated son Gregory Belliveau W-92520. She received calls from her son between 2006 and 2010. Petitioner Virginia Polk has records of the calls Global Tel Link (Bea Berry Senior Billing/Customer Service Supervisor provided to her in response for call detail and prepaid call payments). Said records cover the period beginning in 2006 through 2007.

DTC - GTL 1-3:

For each telephone call identified in response to DTC-GTL 1-2 that you allege was of poor quality, identify the alleged quality issues(s) and the cause(s) of the alleged quality issue(s), explain how you determined the cause(s) of the issue(s), and if you placed the call from a correctional facility, describe the telephone equipment you used to place the call, and whether the telephone service provider was contacted about the issue, the date and time of such contact, and all documents supporting such contact.

Response:

Petitioner Virginia Polk objects to the request insofar as it requires her to identify and describe each call of poor quality received since 1998. This request is unduly burdensome.

Without waiving this objection, Petitioner Polk states that she stands by the allegations in her affidavit and that she continues to experience dropped calls and poor line connection quality making it difficult, sometimes impossible, for either party to hear what is being said. She has no other documents responsive to this request in her possession.

DTC - GTL 1-4:

For Petitioners who are lawyers, law firms or otherwise provide legal services and that claim they have declined to accept calls placed from Massachusetts correctional facilities, or have limited the acceptance of such calls in any way, identify by date and time each instance in which an incoming call was declined and the individual attempting to place the call, and produce all documents relating to such calls and all any policies or procedures relating to accepting, declining or limiting calls placed from Massachusetts correctional facilities.

Response:

This does not apply to Petitioner Polk.

DTC - GTL 1-5:

Identify each Petitioner that has used a prepaid calling card to place or receive a telephone call from a Massachusetts correctional facility and produce all documents relating to such prepaid calling cards or their use, including the PINs associated with those cards or other prepaid card activation and use records.

Response:

Petitioner Virginia Polk paid prepaid for the calls received. She has attached available phone records referred to in her answer to GTL 1-2. Petitioner Virginia Polk requested the call detail and prepaid call payment records from GTL for after 2007 but GTL did not provide her with these records.

DTC - GTL 1-6:

Produce all documents relating to per-call surcharges and/or tariffed service or other fees assessed by telephone service providers serving any Massachusetts correctional facility.

Response:

Aside from her billing records attached hereto, Ms. Polk has no further responsive documents.

DTC - GTL 1-7:

Produce all documents that were used or relied upon in relation to creating the chart attached as Appendix II to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix II, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Petitioner Virginia Polk, who did not participate in creating the chart attached as Appendix II to the Petition.

DTC - GTL 1-8:

Produce all documents that were used, or relied upon, to create Appendix III to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix III, and identify all individuals who were involved in the creation of Appendix III.

Response:

This request does not apply to Petitioner Virginia Polk, who did not participate in creating the chart attached as Appendix III to the Petition.

DTC - GTL 1-9:

Produce all documents that were used, or relied upon, to creating the chart attached as Appendix IV to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix IV, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Petitioner Virginia Polk, who did not participate in creating the chart attached as Appendix IV to the Petition.

DTC - GTL 1-10:

Produce all documents that were used, or relied upon, in relation to creating Appendix V to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix V, and identify all individuals who were involved in the creation of Appendix V.

Response:

This request does not apply to Petitioner Virginia Polk, who did not participate in creating the chart attached as Appendix V to the Petition.

DTC - GTL 1-11:

Produce all documents that were used, or relied upon, in relation to creating the chart attached as Appendix VI to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix VI, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Petitioner Virginia Polk, who did not participate in creating the chart attached as Appendix VI to the Petition.

DTC - GTL 1-12:

State whether you allege that the telephone rates for in-state and local calls charged by telephone service providers serving Massachusetts correctional facilities violate the Order on Payphone Barriers to Entry & Exit, and OSP Rate Cap issued on or about April 17, 1998 by the Massachusetts Department of Telecommunications and Energy, which was the predecessor agency to the Massachusetts Department of Telecommunications and Cable (the "1998 Order") or any other Massachusetts law or regulation. If your answer is yes to any portion of this request, explain in detail which rates you allege violate the 1998 Order, other law or regulation and how those rates violate the 1998 Order, law or regulation.

Response:

Ms. Polk objects to this request as calling for a legal conclusion. Without waiving this objection, she refers Respondent to the PLS response to this request.

DTC - GTL 1-13:

Produce all documents reflecting all correspondence or communications you have had with a telephone service provider regarding any of the allegations in the Petition in this proceeding, including in its Amendments, including all billing records, requests for information relating to billing, and complaints regarding quality of service.

Response:

Aside from billing records, Petitioner Virginia Polk has no further responsive documents to this request.

DTC - GTL 1-14:

For each Petitioner that submitted an affidavit in this proceeding, identify all statements included in your affidavit that have changed since the time you signed your affidavit or were incorrect at the time of signing and provide a statement in response to this request updating and/or correcting your affidavit.

Response:

Petitioner Virginia Polk stands by the facts as stated in her affidavit at the time she signed it. In addition, she states that she continues to experience high rates, dropped calls, billing problems and poor quality of service complained of in the Petition and fully supports the Petition.

DTC - GTL 1-15:

For each Petitioner that did not submit an affidavit in this proceeding, provide a statement in response to this request explaining why you did not submit an affidavit and detailing all issues that you allege support your inclusion as a Petitioner.

Response:

Ms. Polk submitted an affidavit with the original petition.

DTC - GTL 1-16:

Produce all documents relating to communications with Global Tel*Link or its predecessor relating to any allegations of quality of service or billing issues in relation to telephone calls placed from any Massachusetts correctional facility. If you have no such documents, please state that in writing.

Response:

Aside from billing records, Ms. Polk has no further responsive documents in her possession.

DTC - GTL 1-17:

Produce all documents relating to any communications you have had with the Department of Telecommunications and Cable, any Massachusetts correctional facility, any other federal, state, county or local agency or official, including the Federal Communications Commission, relating to telephone calls placed by prisoners or inmates at correctional facilities.

Response:

Petitioner Virginia Polk has no responsive documents in her possession.

Before the
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Petition of Recipients of Collect Calls From Prisoners at Correctional Institutions in Massachusetts Seeking Relief from the Unjust and Unreasonable Cost of Such Calls	)	D.T.C. 11-16

RESPONSE OF CHERYL WILLIAMS TO GLOBAL TEL*LINK CORPORATION'S FIRST SET OF INFORMATION REQUESTS TO PETITIONERS

RESPONSES TO INFORMATION REQUESTS

GENERAL OBJECTIONS

General Objections:

1. The Petitioners object to the requirement that each petitioner provide documents and information dating back to 1998. This is overbroad, unduly burdensome and unlikely to lead to the discovery of relevant information.

   Notwithstanding this objection, and without waiving this objection, the Petitioners have provided all responsive documents in their possession.

2. The Petitioners object to these requests insofar as they seek information already in the possession of the Respondents. This is unduly burdensome.

   Notwithstanding this objection, and without waiving this objection, the Petitioners have provided all responsive records and documents in their possession.

   In particular, the Petitioners produce all inmate calling service (ICS) requests for proposals and contracts that were obtained from correctional facilities through requests made under the Massachusetts Public Records Act. The Petitioners do not represent that these documents are complete. Individual petitioners have also produced records relating to their ICS service, but do not represent that these documents are complete, and the absence of such documents for any petitioner should not be interpreted to imply that no such records exist as regards that petitioner.

Responses

DTC - GTL 1-1:

Identify every Petitioner in this action. For each Petitioner that is an entity, provide its physical address, mailing address if different from its physical address, telephone number, and a list of all officers and directors or partners and their titles since January 1, 1998. For each Petitioner who is a natural person, provide that individual's mailing address(es), place(s) of business, telephone number, and any aliases or other names that person has used since January 1, 1998.

Response:

Petitioner Cheryl Williams currently resides at 196 Beach Street, Quincy, MA 02170. She has used no aliases.

DTC - GTL 1-2:

For each telephone call that you received from, or placed as, a prisoner or inmate in a Massachusetts correctional facility since January 1, 1998, identify the name of the facility from which the call was placed, the parties to the call, the date and time of the call, the duration of the call, the amount charged for the call, whether the telephone call was placed using a prepaid calling card or as a collect call, the telephone service provider used, and all issues, if any, that you allege affected the quality of the call. Produce all documents, including any billing records or PINs relating to each such call.

Response:

Petitioner Cheryl Williams objects to the request insofar as it requires her to identify each call made over her loved one's incarceration and provide specific information regarding each call. This request is unduly burdensome.

Without waiving this objection, Petitioner Cheryl Williams states that from on or before 2009 she received collect or prepaid calls connected by GTL from her fiancé (Samuel Conti W84707) at NCCI Gardner. He is also a petitioner. Petitioner Cheryl Williams does not have any documents responsive to this request in her possession.

DTC - GTL 1-3:

For each telephone call identified in response to DTC-GTL 1-2 that you allege was of poor quality, identify the alleged quality issues(s) and the cause(s) of the alleged quality issue(s), explain how you determined the cause(s) of the issue(s), and if you placed the call from a correctional facility, describe the telephone equipment you used to place the call, and whether the telephone service provider was contacted about the issue, the date and time of such contact, and all documents supporting such contact.

Response:

Petitioner Cheryl Williams objects to this request insofar as it requires her to identify and describe each call of poor quality she's received over the years. This request is unduly burdensome.

Without waiving this objection, Petitioner Cheryl Williams states that bad connections regularly deprived her and her loved one of the ability to hear each other and false three-way call detection required her loved one to place subsequent calls generating additional charges that Petitioner Cheryl Williams paid for. Petitioner Cheryl Williams personally witnessed poor sound quality, bad connections and billing problems including account statement problems where GTL reported she had no balance even though she had not used her account to pay for any calls and failed to provide her with an itemized billing statement. Ms. Petitioner Cheryl Williams is not a telecommunications technician. She determined these issues were due to GTL's provision of service based on the fact that poor sound quality, bad connections and dropped calls from false three-way call detection, occurred repeatedly when GTL was the phone service provider.

DTC - GTL 1-4:

For Petitioners who are lawyers, law firms or otherwise provide legal services and that claim they have declined to accept calls placed from Massachusetts correctional facilities, or have limited the acceptance of such calls in any way, identify by date and time each instance in which an incoming call was declined and the individual attempting to place the call, and produce all documents relating to such calls and all any policies or procedures relating to accepting, declining or limiting calls placed from Massachusetts correctional facilities.

Response:

This does not apply to Petitioner Cheryl Williams.

DTC - GTL 1-5:

Identify each Petitioner that has used a prepaid calling card to place or receive a telephone call from a Massachusetts correctional facility and produce all documents relating to such prepaid calling cards or their use, including the PINs associated with those cards or other prepaid card activation and use records.

Response:

Petitioner Cheryl Williams was a GTL prepaid account customer of record. Petitioner Cheryl Williams does not have responsive documents to this request in her possession.

DTC - GTL 1-6:

Produce all documents relating to per-call surcharges and/or tariffed service or other fees assessed by telephone service providers serving any Massachusetts correctional facility.

Response:

Petitioner Cheryl Williams was a GTL prepaid account customer of record. Petitioner Cheryl Williams does not have any documents responsive to this request in her possession.

DTC - GTL 1-7:

Produce all documents that were used or relied upon in relation to creating the chart attached as Appendix II to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix II, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Petitioner Cheryl Williams, who did not participate in creating the chart attached as Appendix II to the Petition.

DTC - GTL 1-8:

Produce all documents that were used, or relied upon, to create Appendix III to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix III, and identify all individuals who were involved in the creation of Appendix III.

Response:

This request does not apply to Petitioner Cheryl Williams, who did not participate in creating the chart attached as Appendix III to the Petition.

DTC - GTL 1-9:

Produce all documents that were used, or relied upon, to creating the chart attached as Appendix IV to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix IV, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Petitioner Cheryl Williams, who did not participate in creating the chart attached as Appendix IV to the Petition.

DTC - GTL 1-10:

Produce all documents that were used, or relied upon, in relation to creating Appendix V to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix V, and identify all individuals who were involved in the creation of Appendix V.

Response:

This request does not apply to Petitioner Cheryl Williams, who did not participate in creating the chart attached as Appendix V to the Petition.

DTC - GTL 1-11:

Produce all documents that were used, or relied upon, in relation to creating the chart attached as Appendix VI to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix VI, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Petitioner Cheryl Williams, who did not participate in creating the chart attached as Appendix VI to the Petition.

DTC - GTL 1-12:

State whether you allege that the telephone rates for in-state and local calls charged by telephone service providers serving Massachusetts correctional facilities violate the Order on Payphone Barriers to Entry & Exit, and OSP Rate Cap issued on or about April 17, 1998 by the Massachusetts Department of Telecommunications and Energy, which was the predecessor agency to the Massachusetts Department of Telecommunications and Cable (the "1998 Order") or any other Massachusetts law or regulation. If your answer is yes to any portion of this request, explain in detail which rates you allege violate the 1998 Order, other law or regulation and how those rates violate the 1998 Order, law or regulation.

Response:

Ms. Williams objects to this request as calling for a legal conclusion. Without waiving this objection, she refers Respondent to the PLS response to this request.

DTC - GTL 1-13:

Produce all documents reflecting all correspondence or communications you have had with a telephone service provider regarding any of the allegations in the Petition in this proceeding, including in its Amendments, including all billing records, requests for information relating to billing, and complaints regarding quality of service.

Response:

Petitioner Cheryl Williams has no responsive documents in her possession.

DTC - GTL 1-14:

For each Petitioner that submitted an affidavit in this proceeding, identify all statements included in your affidavit that have changed since the time you signed your affidavit or were incorrect at the time of signing and provide a statement in response to this request updating and/or correcting your affidavit.

Response:

Petitioner Cheryl Williams stands by the facts as stated at the time she signed her affidavit.

DTC - GTL 1-15:

For each Petitioner that did not submit an affidavit in this proceeding, provide a statement in response to this request explaining why you did not submit an affidavit and detailing all issues that you allege support your inclusion as a Petitioner.

Response:

This request does not apply to Petitioner Cheryl Williams.

DTC - GTL 1-16:

Produce all documents relating to communications with Global Tel*Link or its predecessor relating to any allegations of quality of service or billing issues in relation to telephone calls placed from any Massachusetts correctional facility. If you have no such documents, please state that in writing.

Response:

Petitioner Cheryl Williams has no responsive documents in her possession.

DTC - GTL 1-17:

Produce all documents relating to any communications you have had with the Department of Telecommunications and Cable, any Massachusetts correctional facility, any other federal, state, county or local agency or official, including the Federal Communications Commission, relating to telephone calls placed by prisoners or inmates at correctional facilities.

Response:

Petitioner Cheryl Williams has no responsive documents in her possession.

Before the
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Petition of Recipients of Collect Calls From Prisoners at Correctional Institutions in Massachusetts Seeking Relief from the Unjust and Unreasonable Cost of Such Calls	)	D.T.C. 11-16

RESPONSE OF SHIRLEY TURNER TO GLOBAL TEL*LINK CORPORATION'S FIRST SET OF INFORMATION REQUESTS TO PETITIONERS

RESPONSES TO INFORMATION REQUESTS

GENERAL OBJECTIONS

General Objections:

1. The Petitioners object to the requirement that each petitioner provide documents and information dating back to 1998. This is overbroad, unduly burdensome and unlikely to lead to the discovery of relevant information.

   Notwithstanding this objection, and without waiving this objection, the Petitioners have provided all responsive documents in their possession.

2. The Petitioners object to these requests insofar as they seek information already in the possession of the Respondents. This is unduly burdensome.

   Notwithstanding this objection, and without waiving this objection, the Petitioners have provided all responsive records and documents in their possession.

   In particular, the Petitioners produce all inmate calling service (ICS) requests for proposals and contracts that were obtained from correctional facilities through requests made under the Massachusetts Public Records Act. The Petitioners do not represent that these documents are complete. Individual petitioners have also produced records relating to their ICS service, but do not represent that these documents are complete, and the absence of such documents for any petitioner should not be interpreted to imply that no such records exist as regards that petitioner.

Responses

DTC - GTL 1-1:

Identify every Petitioner in this action. For each Petitioner that is an entity, provide its physical address, mailing address if different from its physical address, telephone number, and a list of all officers and directors or partners and their titles since January 1, 1998. For each Petitioner who is a natural person, provide that individual's mailing address(es), place(s) of business, telephone number, and any aliases or other names that person has used since January 1, 1998.

Response:

Petitioner Shirley Turner currently resides at 116 High Street, Ipswich, MA 01938. She has used no aliases.

DTC - GTL 1-2:

For each telephone call that you received from, or placed as, a prisoner or inmate in a Massachusetts correctional facility since January 1, 1998, identify the name of the facility from which the call was placed, the parties to the call, the date and time of the call, the duration of the call, the amount charged for the call, whether the telephone call was placed using a prepaid calling card or as a collect call, the telephone service provider used, and all issues, if any, that you allege affected the quality of the call. Produce all documents, including any billing records or PINs relating to each such call.

Response:

Ms. Shirley Turner objects to the request insofar as it requires her to identify each call received since 1998 and provide specific information regarding each call. This request is unduly burdensome.

Without waiving this objection, From July 2008 until December 31, 2009, Ms. Turner's husband was incarcerated at the Lawrence Correctional Alternative Center in Lawrence, MA, a correctional facility operated by the Essex County Sheriff's Department. She was a customer of Evercom for the entire time of her husband's incarceration. Evercom's telephone service allowed her to receive collect telephone calls from him. She also had a prepaid account with Evercom. She has no documents responsive to this request. She generally spoke with her husband once, sometimes twice a day, and more when necessary. She averaged seven-to-ten calls a week.

DTC - GTL 1-3:

For each telephone call identified in response to DTC-GTL 1-2 that you allege was of poor quality, identify the alleged quality issues(s) and the cause(s) of the alleged quality issue(s), explain how you determined the cause(s) of the issue(s), and if you placed the call from a correctional facility, describe the telephone equipment you used to place the call, and whether

the telephone service provider was contacted about the issue, the date and time of such contact, and all documents supporting such contact.

Response:

Ms. Shirley Turner objects to the request insofar as it requires her to identify and describe each call of poor quality. This request is unduly burdensome.

Without waiving this objection, Ms. Shirley Turner states most of the calls she received from her husband had really poor sound quality. Sometimes one party could hear but not the other, voices faded in and out, there was static that made hearing the other party difficult. Other times calls would be audible for a few minutes then all of a sudden it would be hard to hear. During high volume call times it was particularly bad. Her husband's voice would be very hard to hear, as if he were speaking underwater, or there would be a lot of static on the line. When one of them couldn't understand the other as a result of a poor connection, they would be forced to hang up and he would call her back. Sometimes trying a different phone would improve the sound quality. But each redialed call meant she was charged another connection fee because of Evercom's poor service. This would happen several times week. When there were lots of other prisoners on the phones, she could often hear other prisoners shouting to be heard, then getting upset and slamming down the phone. Calls would also be cut off regularly before the time limit. This happened about once a week.

She had serious problems with Evercom's customer service. They refused to take responsibility for anything, saying it wasn't their problem if the phones were giving customers trouble and the sound quality was poor. Customer service was completely unhelpful and insisted that she print out their on-line form if she wanted to claim credit for problem calls. Ms. Turner could not access their website from work for security reasons. They told her to go to a library and use the computers. She couldn't get to one when it was open because she worked two jobs. Evercom refused to send her a form by mail, so she was unable to make a claim.

Evercom refused to credit her for calls cut off prematurely or that had bad Connections unless they were longer than one minute in duration. Sometimes the sound quality would deteriorate after the call started; other times it would take a minute to realize there was a problem with the call. The only time Evercom offered to issue refunds for calls that were prematurely cut off was if Ms. Turner consented to their listening to the DOC's tape of the call. This would have been an unwanted and unnecessary invasion of her privacy. Ms. Shirley Turner is not a telecommunications technician. She determined the quality of service issues based on the fact that the problems occurred repeatedly when Evercom was the phone service provider. Ms. Shirley Turner complained to Evercom via telephone and does not have documents or records regarding her complaints in her possession.

DTC - GTL 1-4:

For Petitioners who are lawyers, law firms or otherwise provide legal services and that claim they have declined to accept calls placed from Massachusetts correctional facilities, or

have limited the acceptance of such calls in any way, identify by date and time each instance in which an incoming call was declined and the individual attempting to place the call, and produce all documents relating to such calls and all any policies or procedures relating to accepting, declining or limiting calls placed from Massachusetts correctional facilities.

Response:

This does not apply to Ms. Shirley Turner.

DTC - GTL 1-5:

Identify each Petitioner that has used a prepaid calling card to place or receive a telephone call from a Massachusetts correctional facility and produce all documents relating to such prepaid calling cards or their use, including the PINs associated with those cards or other prepaid card activation and use records.

Response:

Petitioner Shirley Turner has no documents responsive to this request in her possession.

DTC - GTL 1-6:

Produce all documents relating to per-call surcharges and/or tariffed service or other fees assessed by telephone service providers serving any Massachusetts correctional facility.

Response:

Petitioner Shirley Turner has no responsive documents in her possession.

DTC - GTL 1-7:

Produce all documents that were used or relied upon in relation to creating the chart attached as Appendix II to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix II, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Petitioner Shirley Turner, who did not participate in creating the chart attached as Appendix II to the Petition.

DTC - GTL 1-8:

Produce all documents that were used, or relied upon, to create Appendix III to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix III, and identify all individuals who were involved in the creation of Appendix III.

Response:

This request does not apply to Petitioner Shirley Turner, who did not participate in creating the chart attached as Appendix III to the Petition.

DTC - GTL 1-9:

Produce all documents that were used, or relied upon, to creating the chart attached as Appendix IV to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix IV, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Petitioner Shirley Turner, who did not participate in creating the chart attached as Appendix IV to the Petition.

DTC - GTL 1-10:

Produce all documents that were used, or relied upon, in relation to creating Appendix V to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix V, and identify all individuals who were involved in the creation of Appendix V.

Response:

This request does not apply to Petitioner Shirley Turner who did not participate in creating the chart attached as Appendix V to the Petition.

DTC - GTL 1-11:

Produce all documents that were used, or relied upon, in relation to creating the chart attached as Appendix VI to the Petition in this proceeding, dated August 31, 2009, including all working drafts of Appendix VI, and identify all individuals who were involved in the creation of that chart, and describe the methodology used to create such chart.

Response:

This request does not apply to Petitioner Shirley Turner, who did not participate in creating the chart attached as Appendix VI to the Petition.

DTC - GTL 1-12:

State whether you allege that the telephone rates for in-state and local calls charged by telephone service providers serving Massachusetts correctional facilities violate the Order on

Payphone Barriers to Entry & Exit, and OSP Rate Cap issued on or about April 17, 1998 by the Massachusetts Department of Telecommunications and Energy, which was the predecessor agency to the Massachusetts Department of Telecommunications and Cable (the "1998 Order") or any other Massachusetts law or regulation. If your answer is yes to any portion of this request, explain in detail which rates you allege violate the 1998 Order, other law or regulation and how those rates violate the 1998 Order, law or regulation.

Response:

Ms. Turner objects to this request as calling for a legal conclusion. Without waiving this objection, she refers Respondents to the PLS response to this request.

DTC - GTL 1-13:

Produce all documents reflecting all correspondence or communications you have had with a telephone service provider regarding any of the allegations in the Petition in this proceeding, including in its Amendments, including all billing records, requests for information relating to billing, and complaints regarding quality of service.

Response:

Ms. Shirley Turner has no responsive documents in his possession.

DTC - GTL 1-14:

For each Petitioner that submitted an affidavit in this proceeding, identify all statements included in your affidavit that have changed since the time you signed your affidavit or were incorrect at the time of signing and provide a statement in response to this request updating and/or correcting your affidavit.

Response:

Petitioner Shirley Turner states that she stands by the facts as stated in her affidavit when she signed it and otherwise incorporates her previous answers to these requests regarding quality of service and billing issues she has experienced.

DTC - GTL 1-15:

For each Petitioner that did not submit an affidavit in this proceeding, provide a statement in response to this request explaining why you did not submit an affidavit and detailing all issues that you allege support your inclusion as a Petitioner.

Response:

This request does not apply to Petitioner Shirley Turner.

DTC - GTL 1-16:

Produce all documents relating to communications with Global Tel*Link or its predecessor relating to any allegations of quality of service or billing issues in relation to telephone calls placed from any Massachusetts correctional facility. If you have no such documents, please state that in writing.

Response:

Petitioner Shirley Turner has no responsive documents in her possession.

DTC - GTL 1-17:

Produce all documents relating to any communications you have had with the Department of Telecommunications and Cable, any Massachusetts correctional facility, any other federal, state, county or local agency or official, including the Federal Communications Commission, relating to telephone calls placed by prisoners or inmates at correctional facilities.

Response:

Petitioner Shirley Turner has no responsive documents in her possession.