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*ADMITTED IN DC ONLY

March 10, 2014

Via Electronic Mail and Fed Ex

Catrice C. Williams
Secretary
Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, Massachusetts 02118

**Re: D.T.C. 11-16, Petition of Recipients of Collect Calls from Prisoners at
Correctional Institutions in Massachusetts**

Dear Secretary Williams:

Global Tel*Link Corporation (“GTL”), by its attorneys, hereby respectfully submits its First Set of Information Requests to Petitioners in the above-referenced matter. Three (3) copies of this submission have been mailed to the hearing officer, and one copy has been mailed to each Department staff member listed on the service list per the Procedural Order issued February 27, 2014.

Per the parties’ agreement, expert discovery is not part of this submission and will be scheduled for a later date.

If you have any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

/s/ Chérie R. Kiser

Chérie R. Kiser

Counsel for Global Tel*Link Corporation

Enclosures

cc: Service List

**Before the
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

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

**GLOBAL TEL*LINK CORPORATION’S FIRST SET
OF INFORMATION REQUESTS TO PETITIONERS**

Global Tel*Link Corporation (“GTL”), by its attorneys and pursuant to 220 C.M.R. § 1.06(6)(c) and the Procedural Order issued in this proceeding on February 27, 2014 (“Procedural Order”), hereby submits the following First Set of Information Requests to Petitioners. GTL requests that all responses and responsive documents be delivered to counsel for GTL, Chérie R. Kiser, Cahill Gordon & Reindel LLP, 1990 K Street, N.W., Suite 950, Washington, D.C. 20006 no later than the close of business on **April 22, 2014**, in accordance with the Procedural Order.

DEFINITIONS

1. “Petitioner” refers to each and every entity or individual identified in Attachment B to the document entitled “Amendment #2: Additional Petitioners,” dated April 27, 2011 filed in this proceeding. To the extent additional individuals or entities are identified in response to request DTC - GTL 1-1 below, those additional individuals or entities shall be deemed to fall within the definition of “Petitioners” for the purpose of responding to this First Set of Information Requests.

2. “You” or “your” refers to each Petitioner as if such Petitioner were identified by name. For each entity that is a Petitioner, the terms “you” and “your” shall also mean all present

and former officers, directors, agents, employees, partners, parents, subsidiaries, affiliates, divisions, area or regional offices, predecessors-in-interest, attorneys and consultants.

3. “Communication” means any transmittal of information, whether facts, ideas, inquiries, or otherwise, regardless of form, method or medium.

4. “Document” and “documents” are used in their broadest sense to mean all things subject to discovery, including, but not limited to, any writings, drawings, graphs, charts, photographs, phonograph records, tape recordings, notes, diaries, calendars, books, papers, accounts, microfilm, microfiche, computer printouts, e-mail or other electronic documents, correspondence, handwritten notes, records or reports, bills, checks, electronic or videotape recordings, and any computer-generated, computer-stored, or electronically-stored matter from which information can be obtained. All drafts and non-identical copies of documents and electronically stored information are considered to be separate and unique documents and electronically stored information as those terms as used herein.

5. “Including” means including but not limited to.

6. “Relating to” or “in relation to” means relating to, referring to, concerning, describing, pertaining to, evidencing, reflecting, regarding, constituting, involving, or touching upon in any way. Each of these terms may be used interchangeably herein and will be treated as encompassing all these meanings.

INSTRUCTIONS

1. Unless otherwise stated, each Petitioner should answer each request in writing on a separate page including: the case docket number, the request set and question number, the name of the person who will support the response, and a recitation of the request.

2. Requests shall be deemed continuing so as to require further supplemental responses if you locate, receive or generate additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.

3. Unless otherwise specified, the relevant time period for these responses is January 1, 1998 to the present.

4. In complying with these information requests, you are required to produce all documents described below which are in your possession, custody or control, including those documents in the possession, custody or control of your present or former attorneys, investigators, accountants, financial and investment advisors, placement agents, employees or other agents, as well as any other persons acting on your behalf, wherever located and in whatever form they may exist.

5. A document is deemed to be in your possession or control if it is in your physical custody, or if it is in the physical custody of any other person and you (a) own such document in whole or in part, (b) have a right, by contract, statute, or otherwise to use, inspect, examine or copy such document on any terms, (c) have an understanding, express or implied, that you may use, inspect, examine or copy such document on any terms, or (d) have, as a practical matter, been able to use, inspect, examine or copy such document when you sought to do so.

6. For the purposes of reading, interpreting, or construing the scope of these requests, the terms used shall be given their most expansive and inclusive interpretation.

7. Unless instructed otherwise, each request shall be construed independently and not by reference to any other request for the purpose of limitation.

8. If you are unable to answer or respond fully to any request, answer or respond to the extent possible and specify the reason for your inability to answer or respond in full. If you have no documents responsive to a particular request, so state.

9. Unless otherwise specified, these requests call for both the original of each document and all non-identical copies. An identical copy of the original may be produced in lieu of the original, so long as it is legible and bound or stapled in the same manner as the original.

10. If a portion of a document is responsive to any request, the entire document should be produced.

11. If any requested document cannot be produced in full, produce the document to the extent possible, specifying each reason for your inability to produce the remainder of the document and stating whatever information, knowledge or belief that you have concerning the portion not produced.

12. If any documents are within the scope of any request for production, but are being withheld, in whole or in part, by reasons of any claim of privilege, the attorney asserting the privilege shall identify the nature of the privilege (including work product) which is being claimed and, if the privilege is governed by state law, indicate the state's privilege rule being invoked, and provide the following information:

- a. the type of document, *e.g.*, letter or memorandum;
- b. the general subject matter of the document;
- c. the date of the document; and
- d. such other information as is sufficient to identify the document, including, where appropriate, the author of the document, the addressees of the document, and any other recipients

shown in the document, and, where not apparent, the relationship of the author, addressees, and recipients to each other.

13. If any document responsive to these requests was, but is no longer in your possession or control, state whether it is (a) missing or lost, (b) has been destroyed, (c) has been transferred, voluntarily or involuntarily, to others, or (d) has been otherwise disposed of, and in each instance explain the circumstances surrounding such disposition and state the date or approximate date thereof.

14. Documents produced pursuant to these requests shall be produced as they are kept in the ordinary course of business, including electronically stored information and documents, such as spreadsheets. Electronic documents and data that are electronically searchable should be produced in a form that does not remove or degrade this feature.

15. The fact that a document is produced by another party does not relieve you of the obligation to produce your copy of the same document, even if the two documents are identical.

16. These requests shall not be construed as a waiver or abridgment of, and are not intended to waive, any argument or defense, or any objection to any Petitioner's discovery requests nor shall they be construed as an admission of any fact.

17. If you object to any part of any request, you shall state fully the nature of the objection and shall nonetheless comply fully with the other parts of the request not objected to.

18. In construing the following information requests (a) the singular shall include the plural and the plural shall include the singular; (b) a masculine, feminine, or neuter pronoun shall not exclude the other genders; (c) the past tense includes the present tense unless the clear meaning is distorted by a change of tense; (d) the terms "any" or "all" shall be understood to

mean “any and all”; and (e) the terms “and” and “or” shall be read in the conjunctive or disjunctive or both, such that the request is understood in the most expansive manner.

INFORMATION REQUESTS

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

Dated: March 10, 2014

GLOBAL TEL*LINK CORPORATION

/s/ Chérie R. Kiser

Chérie R. Kiser

Angela F. Collins

Cahill Gordon & Reindel LLP

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Its Attorneys

CERTIFICATE OF SERVICE

I, Angela F. Collins, certify that on this 10th day of March 2014, I served a copy of the foregoing Global Tel*Link Corporation's First Set of Information Requests to Petitioners on the following via the method indicated:

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Angela F. Collins