

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

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

CONSENT MOTION FOR EXTENSION OF ANSWER DEADLINE

Global Tel*Link Corporation (“GTL”), by its attorneys and pursuant to 220 C.M.R. § 1.02(5), respectfully moves for a 60-day extension of time to January 20, 2012 to file its Answer in the above-referenced proceeding. Petitioners have authorized GTL to indicate that they consent to this 60-day extension request. In support of this Motion, GTL states:

1. On August 31, 2009, Petitioners filed a petition seeking relief from what they claim are unjust and unreasonable rates for prisoner telephone service in Massachusetts (“Petition”). The Petitioners are “family members, loved ones, legal counsel, and others residing in Massachusetts who receive and pay for telephone calls from prisoners who live in [Massachusetts]’ prisons, jails, and houses of correction.” Petition at 1. Petitioners amended their Petition on May 18, 2010 to include allegations of service quality problems with respect to GTL’s inmate telephone services and to include additional petitioners as parties to the Petition. Petitioners further amended their Petition on April 27, 2011 to include additional petitioners.

2. On November 10, 2011, the Massachusetts Department of Telecommunications and Cable (“Department”) docketed the Petition, and established November 21, 2011 as the deadline for GTL to answer the Petition.

3. The Petition raises numerous allegations and claims with respect to the prisoner telephone service provided by GTL at various Massachusetts correctional facilities. The Petition provides over 200 pages of factual allegations, affidavits, and other materials that need to be reviewed and investigated in order for GTL to formulate its answer to the Petition.

4. For example, some of the Petition's allegations concern the quality of calls provided by GTL, and the Petition refers to particular service quality issues for certain called parties receiving calls made by prisoners in Massachusetts correctional facilities served by GTL. GTL takes complaints regarding the quality of its services very seriously. When issues regarding the service quality of an inmate call are brought to GTL's attention, it generally reviews the recording of the call to assess the quality of the call, and determine whether a credit or refund is warranted. Thus, GTL must first determine whether the call quality issues raised in the Petition have previously been addressed via its routine complaint process. If complaints were not previously directed to GTL, it must then investigate the allegation to the extent sufficient information has been provided in the Petition. Given the number of petitioners and calls at issue, the requested extension will allow GTL to thoroughly investigate and respond to the service quality claims raised by the Petitioners.

5. The additional time requested will also permit GTL to review the allegations against GTL's contractual obligations with the Massachusetts correctional facilities at issue in the Petition. GTL provides inmate telephone services in Massachusetts pursuant to contracts between GTL and the correctional facility. Those contracts place specific and detailed requirements on GTL to ensure inmate telephone services meet the safety and security parameters of the correctional facility. Grant of GTL's extension request will allow GTL to

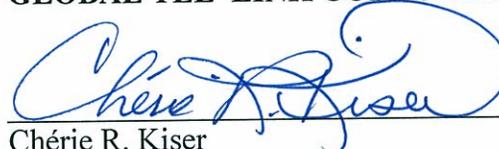
review the allegations made by the Petitioners against its contractual requirements in Massachusetts.

6. Thus, the additional time requested will enable GTL to provide a more complete factual and legal record in this proceeding. No party is harmed by grant of this requested extension, and the Petitioners have consented to the 60-day extension. Good cause therefore exists to extend the deadline for filing an answer to the Petition to January 20, 2012.

Accordingly, in light of the foregoing and the Petitioners' consent to this request, GTL respectfully requests that the Department extend the time for filing answers to the Petition to January 20, 2012.

Respectfully submitted,

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Dated: November 14, 2011

CERTIFICATE OF SERVICE

I, Angela F. Collins, certify that on this 14th day of November 2011, I served a copy of the foregoing Motion for Extension of Answer Deadline on the following via the method indicated:

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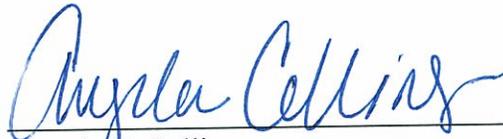
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