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*ADMITTED IN DC ONLY

May 29, 2014

Via Electronic Mail and Federal Express

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 the **PUBLIC VERSION** of its Supplemental Responses and Objections to Petitioners’ First Set of Interrogatories and Petitioners’ First Set of Requests for Production of Documents. Three (3) copies of this submission have been sent 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.

In addition, GTL has provided the Hearing Officer with the **CONFIDENTIAL VERSION** of its Supplemental Responses and Objections to Petitioners’ First Set of Interrogatories and Petitioners’ First Set of Requests for Production of Documents in a sealed envelope along with a CD-ROM, both of which are labeled “CONFIDENTIAL” in accordance with the requirements of the Procedural Order. GTL requests confidential treatment for the CONFIDENTIAL VERSION of its Supplemental Responses and Objections in accordance with its Motion for Confidential Treatment filed on April 29, 2014 in the above-referenced matter.

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

Respectfully submitted,

A handwritten signature in blue ink that reads "Chérie R. Kiser". The signature is fluid and cursive, with a large loop at the end of the last name.

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
SUPPLEMENTAL RESPONSES AND OBJECTIONS TO PETITIONERS' FIRST SET
OF INTERROGATORIES AND PETITIONERS' FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS**

Global Tel*Link Corporation (“GTL”), by and through its attorneys, hereby provides its Supplemental Responses to Petitioners’ First Set of Interrogatories (“Interrogatories”) and its Supplemental Responses to Petitioners’ First Set of Requests for Production of Documents (“Requests”). GTL incorporates by reference its General Objections and Specific Objections to the Interrogatories as set forth in Global Tel*Link Corporation’s Responses and Objections to Petitioners’ First Set of Interrogatories filed in the above-referenced docket on April 29, 2014. GTL also incorporates by reference its General Objections and Specific Objections to the Requests as set forth in Global Tel*Link Corporation’s Responses and Objections to Petitioners’ First Set of Requests for Production of Documents filed in the above-referenced docket on April 29, 2014.

In accordance with its offer to confer as stated in its initial Responses and Objections filed April 29, 2014, GTL initiated and participated in meet-and-confer sessions with Petitioners on May 20 and May 22, 2014. On May 27, 2014, GTL provided Petitioners with a list of publicly available websites at which certain information in response to Petitioners’ Interrogatories and Requests could be found. In response to the items raised by Petitioners

during the meet-and-confer sessions, GTL provides the following supplemental responses. GTL also updates the figures contained in response to Interrogatory No. 16, which have been designated by GTL as confidential pursuant to its Motion for Confidential Treatment filed April 29, 2014.

SUPPLEMENTAL RESPONSES TO INTERROGATORIES

INTERROGATORY No. 9:

If you currently use live operators in the provision of inmate calling services in Massachusetts, how many and in what capacity are they used at each facility for which you provide ICS?

GTL Response to Interrogatory No. 9:

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory is not reasonably calculated to lead to the discovery of admissible evidence and this Interrogatory seeks information that is not relevant to the subject matter of this proceeding. Questions concerning the number of live operators GTL uses and the capacity in which live operators are used are beyond the scope of this proceeding as they do not relate to “the per-call surcharge assessed by ICS providers” or any of the other three areas of inquiry identified in the *Interlocutory Order*. Without waiving its General Objections or its Specific Objections to this Interrogatory, GTL responds as follows:

“Operator” calls include automated, prepaid services like those offered to inmates and their friends and families by GTL and not solely those services with live operators. The federal definition of “inmate operator services” specifically includes “any automatic or live assistance to a consumer to arrange for billing or completion, or both” of a telephone call. 47 C.F.R. § 64.710(b)(3). Live operators are not used in the origination of calls by inmates, and generally are not permitted to be used under state law or correctional facility requirements. For example, the Massachusetts Department of Corrections Rules on Telephone Access and Use state that all inmate telephone calls must be made “utilizing an automated operator” (103 CMR 482.06(3)(a)). Live operators, however, are available as necessary for friends and family of an inmate.

GTL Supplemental Response to Interrogatory No. 9:

An inmate's friends and family have access to a live GTL customer service representative during the hours of 7am to 11pm (CST), Monday through Friday, and 8am to 7pm (CST) on Saturdays and Sundays (*see* <https://www.offenderconnect.com/learnmore/ContactUsGTL.jsp>). GTL utilizes more than 200 customer service representatives, which are located in five (5) separate call centers throughout the United States. Calls to GTL's customer service number from friends and family of a Massachusetts inmate could be directed to any one of the five call centers. An inmate's friends and family also may access automated customer support systems, which are available 24 hours a day, 7 days a week.

Person who will support GTL Response to Interrogatory No. 9:

Lauren Studebaker, Senior Vice President, Services, Global Tel*Link Corporation

INTERROGATORY No. 11:

For each contract identified in No. 1, please describe:

- a) The number of pre-paid or “debit” accounts for each year from January 2011 to present;
- b) the process used to deposit funds into a pre-paid account. If the process used is different depending on the source of the funds (cash, credit card, western union, check) please explain the process for each separately;
- c) the costs attributable to processing deposits to pre-paid accounts;
- d) the costs attributable to processing refunds from pre-paid accounts;
- e) the dollar mount [sic] that was actually refunded to Massachusetts consumers for each calendar year from January 2011 to the present.

GTL Response to Interrogatory No. 11:

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, #7, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory is vague, ambiguous, overly broad and unduly burdensome, seeks confidential information, and is not reasonably calculated to lead to the discovery of admissible evidence. GTL further objects to this Interrogatory because it seeks information that is not relevant to the subject matter of this proceeding. Questions regarding the number of prepaid or debit accounts, refunds and deposits are beyond the scope of this proceeding as they do not relate to “the per-call surcharge assessed by ICS providers” or any of the other three areas of inquiry identified in the *Interlocutory Order*. GTL further objects to this Interrogatory because the process used to deposit funds into a prepaid account is publicly available in GTL’s Massachusetts tariffs (Global Tel*Link Corporation M.D.T.E. Tariff No. 2 and DSI-ITI, LLC Massachusetts Tariff No. 1), on GTL’s website, in the GTL procedures and information booklets posted on the Massachusetts Department of Corrections website, via the links and information found in Massachusetts Department of Corrections Friends and Family Handbook, on the Plymouth County Sheriff’s Department and Correctional Facility website, and on the Norfolk County Sheriff’s Office website.

GTL Supplemental Response to Interrogatory No. 11:

GTL provides the following publicly available websites where information regarding the process used to deposit funds into a prepaid account is available:

<https://www.offenderconnect.com/portal>

<http://www.gtl.net/friends-and-family-information/>

<http://www.mass.gov/eopss/agencies/doc/> (see bottom left side under Global Tel Link (GTL)/Inmate Telephone Services)

<http://www.mass.gov/eopss/agencies/doc/advancepay.html>

<http://www.mass.gov/eopss/docs/doc/debit-calling.pdf>

<http://www.mass.gov/eopss/law-enforce-and-cj/prisons/offender-progs/advancepay-faq.html>

<http://www.mass.gov/eopss/law-enforce-and-cj/prisons/offender-progs/advancepay-questions.html>

<http://www.mass.gov/eopss/law-enforce-and-cj/prisons/f-and-f-of-inmates/f-and-f-hbook-mar-2014-final.pdf>

http://www.pcsdma.org/Inmate_Information.asp

<http://norfolksheriff.com/friends-and-family-of-inmates/>

Person who will support GTL Response to Interrogatory No. 11:

Brian Hackett, Regulatory Affairs Manager, Global Tel*Link Corporation

INTERROGATORY No. 12:

Please describe the process used to refund unused funds from pre-paid accounts to consumers. If the refunds are unclaimed or otherwise not processed, please describe how these funds are accounted for (e.g. retained as income, transferred to the State's unclaimed funds program) and whether or not commissions are paid on income generated from the unclaimed funds.

GTL Response to Interrogatory No. 12:

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, #7, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory seeks information that is confidential, that is not reasonably calculated to lead to the discovery of admissible evidence, and that is not relevant to the subject matter of this proceeding. Questions regarding the process used to refund unused funds are beyond the scope of this proceeding as they do not relate to "the per-call surcharge assessed by ICS providers" or any of the other three areas of inquiry identified in the *Interlocutory Order*. GTL further objects to this Interrogatory because information regarding the process used to refund unused funds from prepaid accounts is publicly available in GTL's Massachusetts tariffs (Global Tel*Link Corporation M.D.T.E. Tariff No. 2 and DSI-ITI, LLC Massachusetts Tariff No. 1), on GTL's website, in the GTL procedures and information booklets posted on the Massachusetts Department of Corrections website, via the links and information found in Massachusetts Department of Corrections Friends and Family Handbook, on the Plymouth County Sheriff's Department and Correctional Facility website, and on the Norfolk County Sheriff's Office website.

GTL Supplemental Response to Interrogatory No. 12:

GTL provides the following publicly available websites where information regarding the process used to refund unused funds from prepaid accounts is available:

<https://www.offenderconnect.com/portal>
<http://www.gtl.net/friends-and-family-information/>

<http://www.mass.gov/eopss/agencies/doc/> (see bottom left side under Global Tel Link (GTL)/Inmate Telephone Services)
<http://www.mass.gov/eopss/agencies/doc/advancepay.html>
<http://www.mass.gov/eopss/docs/doc/debit-calling.pdf>
<http://www.mass.gov/eopss/law-enforce-and-cj/prisons/offender-progs/advancepay-faq.html>
<http://www.mass.gov/eopss/law-enforce-and-cj/prisons/offender-progs/advancepay-questions.html>
<http://www.mass.gov/eopss/law-enforce-and-cj/prisons/f-and-f-of-inmates/f-and-f-hbook-mar-2014-final.pdf>
http://www.pcsdma.org/Inmate_Information.asp
<http://norfolksheriff.com/friends-and-family-of-inmates/>

Person who will support GTL Response to Interrogatory No. 12:

Brian Hackett, Regulatory Affairs Manager, Global Tel*Link Corporation

INTERROGATORY No. 13:

For each contract identified in No. 1, please identify and describe any and all fees charged by your company to consumers of inmate calling services in Massachusetts for establishing, using, maintaining or closing a pre-paid account, including but not limited to fees for opening an account; depositing funds to an account by cash, check, western union, moneygram, or credit card; obtaining a refund from an account; and maintaining an inactive account, stating the percentage or amount any site commission paid from these fees.

GTL Response to Interrogatory No. 13:

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory seeks information that is not relevant to the subject matter of this proceeding, is not reasonably calculated to lead to the discovery of admissible evidence, and seeks information that is publicly available in GTL's Massachusetts tariffs (Global Tel*Link Corporation M.D.T.E. Tariff No. 2 and DSI-ITI, LLC Massachusetts Tariff No. 1), on GTL's website, in the GTL procedures and information booklets posted on the Massachusetts Department of Corrections website, via the links and information found in Massachusetts Department of Corrections Friends and Family Handbook, on the Plymouth County Sheriff's Department and Correctional Facility website, and on the Norfolk County Sheriff's Office website.

GTL Supplemental Response to Interrogatory No. 13:

GTL provides the following publicly available websites where information regarding fees associated with prepaid accounts is available:

<https://www.offenderconnect.com/portal>

<http://www.gtl.net/friends-and-family-information/>

<http://www.mass.gov/eopss/agencies/doc/> (see bottom left side under Global Tel Link (GTL)/Inmate Telephone Services)

<http://www.mass.gov/eopss/agencies/doc/advancepay.html>

<http://www.mass.gov/eopss/docs/doc/debit-calling.pdf>

<http://www.mass.gov/eopss/law-enforce-and-cj/prisons/offender-progs/advancepay-faq.html>

<http://www.mass.gov/eopss/law-enforce-and-cj/prisons/offender-progs/advancepay-questions.html>

<http://www.mass.gov/eopss/law-enforce-and-cj/prisons/f-and-f-of-inmates/f-and-f-hbook-mar-2014-final.pdf>

http://www.pcsdma.org/Inmate_Information.asp

<http://norfolksheriff.com/friends-and-family-of-inmates/>

Person who will support GTL Response to Interrogatory No. 13:

Brian Hackett, Regulatory Affairs Manager, Global Tel*Link Corporation

INTERROGATORY No. 16:

For each year of each contract identified in No. 1, please state the number of complaints in each of the following categories. If it is not possible to break down complaints by category, please so state and give the most detailed breakdown that your records permit.

- f) Static, line noise and other problems with audibility
- g) Dropped calls
- h) Broken telephone sets
- i) Billing concerns, including but not limited to charges for dropped calls, problems with refunds, and contested fees and surcharges.

GTL Response to Interrogatory No. 16:

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, #7, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory seeks information that is not relevant to the subject matter of this proceeding. Questions regarding broken telephone sets are beyond the scope of this proceeding as “the availability and upkeep of telecommunications equipment at correctional facilities” specifically was excluded from inquiry by the *Interlocutory Order*. Without waiving its General Objections or its Specific Objections to this Interrogatory, GTL responds as follows:

From January 2011 (or from the initiation of service under a particular contract as set forth in GTL Response to Interrogatory No. 1) to March 2014, GTL has received the following complaints regarding billing issues and dropped calls, each of which was resolved in the normal course by either refunding the customer, assisting with the establishment of an account, or otherwise addressing the customer’s specific concern:

Massachusetts Department of Corrections

Billing complaints - ***START CONFIDENTIAL*** ■ ***END CONFIDENTIAL***
Dropped call complaints - ***START CONFIDENTIAL*** ■ ***END
CONFIDENTIAL***

Hamden County Sheriff’s Office

Billing complaints - ***START CONFIDENTIAL*** ■ ***END CONFIDENTIAL***
Dropped call complaints - ***START CONFIDENTIAL*** ■ ***END
CONFIDENTIAL***

Norfolk County Sheriff's Office

Billing complaints - ***START CONFIDENTIAL*** █ ***END CONFIDENTIAL**

Dropped call complaints - ***START CONFIDENTIAL*** █ ***END CONFIDENTIAL**

Plymouth County Sheriff's Office

Billing complaints - ***START CONFIDENTIAL*** █ ***END CONFIDENTIAL**

Dropped call complaints - ***START CONFIDENTIAL*** █ ***END CONFIDENTIAL**

GTL Supplemental Response to Interrogatory No. 16:

In response to a request from Petitioners during the meet-and-confer sessions, GTL reviewed its complaint information, and provides the following updated numbers for complaints received from January 2011 (or from the initiation of service under a particular contract as set forth in GTL Response to Interrogatory No. 1) to March 2014 for billing issues and dropped calls:

Massachusetts Department of Corrections

Billing complaints - ***START CONFIDENTIAL*** █ ***END CONFIDENTIAL***

Dropped call complaints - ***START CONFIDENTIAL*** █ ***END
CONFIDENTIAL***

Hamden County Sheriff's Office

Billing complaints - ***START CONFIDENTIAL*** █ ***END CONFIDENTIAL***

Dropped call complaints - ***START CONFIDENTIAL*** █ ***END
CONFIDENTIAL***

Norfolk County Sheriff's Office

Billing complaints - ***START CONFIDENTIAL*** █ ***END CONFIDENTIAL**

Dropped call complaints - ***START CONFIDENTIAL*** █ ***END CONFIDENTIAL**

Plymouth County Sheriff's Office

Billing complaints - ***START CONFIDENTIAL*** █ ***END CONFIDENTIAL**

Dropped call complaints - ***START CONFIDENTIAL*** █ ***END CONFIDENTIAL**

Person who will support GTL Response to Interrogatory No. 16:

Vance Macdonald, Executive Director of Customer Service, Global Tel*Link Corporation

SUPPLEMENTAL RESPONSES TO REQUESTS

DOCUMENT REQUEST No. 7:

Any document (a) identifying or describing fees charged by your company to consumers of inmate calling services in Massachusetts for establishing, using, maintaining or closing a pre-paid account, (b) listing amounts collected for any such fee or (c) referencing the disposition of such fees once they have been collected.

GTL Response to Document Request No. 7:

GTL repeats and restates its General Objections to this Request, and specifically General Objections #1, #3, #9, #10, #11, and #12. GTL further objects to this Request on the grounds that this Request is vague, ambiguous, overly broad and unduly burdensome, that is confidential and is not reasonably calculated to lead to the discovery of admissible evidence. GTL further objects to this Request on the grounds it seeks information not relevant to the subject matter of this proceeding. Documents relating to amounts collected for fees and the disposition of such fees once they have been collected are not relevant to “the per-call surcharge assessed by ICS providers” or the other three areas of inquiry identified in the *Interlocutory Order*. GTL further objects to this Request to the extent that it seeks production of documents that are protected from disclosure by the attorney-client privilege, attorney work-product doctrine or any other applicable privilege, protection or immunity that makes such information non-discoverable. GTL further objects to this Request on the grounds that it seeks information that is publicly available in GTL’s Massachusetts tariffs (Global Tel*Link Corporation Massachusetts D.T.C. Tariff No. 2 and DSI-ITI, LLC Massachusetts Tariff No. 1), on GTL’s website, in the GTL procedures and information booklets posted on the Massachusetts Department of Corrections website, via the links and information found in Massachusetts Department of Corrections Friends and Family Handbook, on the Plymouth County Sheriff’s Department and Correctional Facility website, and on the Norfolk County Sheriff’s Office website.

GTL Supplemental Response to Document Request No. 7:

GTL provides the following publicly available websites where documents may be found regarding the fees for inmate calling services in Massachusetts:

<https://www.offenderconnect.com/portal>

<http://www.gtl.net/friends-and-family-information/>

<http://www.mass.gov/eopss/agencies/doc/> (see bottom left side under Global Tel Link (GTL)/Inmate Telephone Services)

<http://www.mass.gov/eopss/agencies/doc/advancepay.html>

<http://www.mass.gov/eopss/docs/doc/debit-calling.pdf>

<http://www.mass.gov/eopss/law-enforce-and-cj/prisons/offender-progs/advancepay-faq.html>

<http://www.mass.gov/eopss/law-enforce-and-cj/prisons/offender-progs/advancepay-questions.html>

<http://www.mass.gov/eopss/law-enforce-and-cj/prisons/f-and-f-of-inmates/f-and-f-hbook-mar-2014-final.pdf>

http://www.pcsdma.org/Inmate_Information.asp

<http://norfolksheriff.com/friends-and-family-of-inmates/>

Person who will support GTL Response to Document Request No. 7:

Brian Hackett, Regulatory Affairs Manager, Global Tel*Link Corporation

DOCUMENT REQUEST No. 20:

Your promotional and marketing materials concerning any and all aspects of your provision of inmate calling services from 2011 to the present.

GTL Response to Document Request No. 20:

GTL repeats and restates its General Objections to this Request, and specifically General Objections #1, #3, #9, #10, #11, and #12. GTL further objects to this Request because the Request is vague, ambiguous, overly broad and unduly burdensome, seeks information that is publicly available or not relevant to the subject matter of this proceeding, and is not reasonably calculated to lead to the discovery of admissible evidence. Documents regarding “promotional and marketing materials” are not relevant to the four areas of inquiry identified in the *Interlocutory Order*. GTL further objects to this Request to the extent that it seeks production of documents that are protected from disclosure by the attorney-client privilege, attorney work-product doctrine or any other applicable privilege, protection or immunity that makes such information non-discoverable. GTL further objects to this Request on the grounds that it seeks information that is publicly available on GTL’s website, in the GTL procedures and information booklets posted on the Massachusetts Department of Corrections website, via the links and information found in Massachusetts Department of Corrections Friends and Family Handbook, on the Plymouth County Sheriff’s Department and Correctional Facility website, and on the Norfolk County Sheriff’s Office website.

GTL Supplemental Response to Document Request No. 20:

GTL provides the following publicly available websites where promotional and marketing materials may be found regarding GTL’s provision of inmate calling services:

<https://www.offenderconnect.com/portal>
<http://www.gtl.net/about-us/>
<http://www.gtl.net/about-us/press-and-news/>
<http://www.gtl.net/correctional-facility-services/>

<http://www.linkedin.com/company/global-tel-link>
<http://www.gtl.net/friends-and-family-information/>
<http://www.mass.gov/eopss/agencies/doc/> (see bottom left side under Global Tel Link (GTL)/Inmate Telephone Services)
<http://www.mass.gov/eopss/agencies/doc/advancepay.html>
<http://www.mass.gov/eopss/docs/doc/debit-calling.pdf>
<http://www.mass.gov/eopss/law-enforce-and-cj/prisons/offender-progs/advancepay-faq.html>
<http://www.mass.gov/eopss/law-enforce-and-cj/prisons/offender-progs/advancepay-questions.html>
<http://www.mass.gov/eopss/law-enforce-and-cj/prisons/f-and-f-of-inmates/f-and-f-hbook-mar-2014-final.pdf>
http://www.pcsdma.org/Inmate_Information.asp
<http://norfolksheriff.com/friends-and-family-of-inmates/>

Person who will support GTL Response to Document Request No. 20:
Brian Hackett, Regulatory Affairs Manager, Global Tel*Link Corporation

CERTIFICATE OF SERVICE

I, Angela Collins, certify on this 29th day of May, 2014, that I:

(1) provided the **CONFIDENTIAL VERSION** of Global Tel*Link Corporation's Supplemental Responses and Objections to Petitioners' First Set of Interrogatories and Petitioners' First Set of Document Requests to the following via Federal Express:

Kalun Lee
Hearing Officer
Department of Telecommunications and Cable
1000 Washington Street, 8th Floor, Suite 820
Boston MA 02118-6500

and

(2) served a copy of the **PUBLIC VERSION** of Global Tel*Link Corporation's Supplemental Responses and Objections to Petitioners' First Set of Interrogatories and Petitioners' First Set of Document Requests on the following via the method indicated:

Catrice C. Williams, Secretary
Department of Telecommunications and Cable
1000 Washington Street, 8th Floor, Suite 820
Boston MA 02118-6500
Email: catrice.williams@state.ma.us
Email: dtcefiling@massmail.state.ma.us
Via Federal Express and Electronic Mail

Kalun Lee
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Via Federal Express and Electronic Mail

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Via Electronic Mail and U.S. Mail

CERTIFICATE OF SERVICE

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