

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

**No. D.T.C. 11-16**

**PETITION OF RECIPIENTS OF COLLECT CALLS FROM  
PRISONERS AT CORRECTIONAL INSTITUTIONS IN MASSACHUSETTS  
SEEKING RELIEF FROM  
THE UNJUST AND UNREASONABLE COST OF SUCH CALLS**

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**PETITIONERS' FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
RESPONDENT INMATE CALLING SOLUTIONS**

Petitioners hereby request, pursuant to 220 CMR 100.06(c), that Respondents produce the documents designated herein in accordance with the Procedural Order issued in this matter on February 27, 2014.

Definitions and Instructions:

Petitioners incorporate the Superior Court Standing Order 1-09 governing written discovery.

The Definitions set forth in the Petitioners' First Set of Interrogatories are incorporated herein by reference.

Please organize all documents produced according to the document request or interrogatory to which each corresponds.

Document Requests

Please produce the following documents:

1. Any and all documents identified in Petitioners' First Set of Interrogatories.
2. To the extent that any formal documentation was created in connection to the complaints listed in Interrogatory 16 please provide a copy of that documentation.

3. Any and all documents that define your current corporate and security quality goals.
4. Any and all documents concerning policies regarding the provision of inmate calling services including issues such as quality, security, network outages, pricing, and dropped calls.
5. Any and all documents concerning the amount of revenues and expenses incurred in relation to each year of each contract identified in response to Interrogatory No. 1. Such documentation would include financial statements, budget performance reports, management report, and any documentation in relation to the payment of site commissions.
6. Any document listing or describing the costs associated with providing ICS to Massachusetts consumers.
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.
8. Any and all documents prepared for upper management or a member or members of the Board of Directors that discusses directly or indirectly the performance of your provision of inmate services in Massachusetts. Please include any and all reports that compare such performance with that of your company's provision of inmate services in other states.
9. Any and all documentation that shows the overall profitability of your operations in Massachusetts for 2011, 2012, 2013 and for 2014.
10. Any and all documentation comparing the total amounts of commissions that were paid in Massachusetts in 2011, 2012, 2013 and in 2014.
11. Any and all documents, reports or analyses that track quality performance by facility, region or state that would cover Massachusetts for the years 2011, 2012, 2013, and 2014. These documents might track things like trouble reports, quantities of dropped calls, network outages, and other related quality assurance issues you might measure or track.
12. If you pay sales commissions or other incentives to employees based upon getting new jails and prisons as customers or for renewing and extending existing contracts, please

provide any and all documents concerning performance goals and standards that are used to define how sales commissions are earned.

13. Any and all documents including cost studies, budget analysis or management reports that calculate your cost of and/or revenue derived from providing calling services in Massachusetts from 2011 to the present.
14. Any and all documents including cost studies, budget analysis or management reports relating to the years 2011 to the present that concern segregating your costs in Massachusetts between the call set up function that is recovered by the surcharge and the costs that are recovered by any per minute or other charges.
15. Any and all documents including reports that show completed and billed minutes by facility that would cover Massachusetts for the fiscal years of 2011, 2012, 2013 and 2014.
16. A copy of your most recent tariff filing with the Massachusetts DTC. If this is available online please provide the web address instead.
17. Any and all documented communications with Massachusetts governmental agencies and/or private contractors that manage or supervise prison facilities in Massachusetts concerning the provision of inmate calling services in the Massachusetts facilities listed in response to No.1.
18. Any and all documented communications concerning your lobbying activities or other governmental advocacy work related to your provision of inmate calling services for the years 2011, 2012, 2013 and 2014.
19. Any and all documents including contracts and addendums concerning agreements with entities that conduct billing services for your inmate calling operations in Massachusetts.
20. Your promotional and marketing materials concerning any and all aspects of your provision of inmate calling services from 2011 to the present.

Respectfully Submitted,

Date: \_\_\_\_\_

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