

March 10, 2014

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BY ELECTRONIC FILING AND FEDERAL EXPRESS

Ms. Catrice C. Williams
Secretary
Department of Telecommunications and Cable
1000 Washington Street, 8th Floor, Suite 820
Boston, MA 02118

Re: 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 – Securus Technologies, Inc.’s First Set Of Information Requests To Petitioners

Dear Ms. Williams:

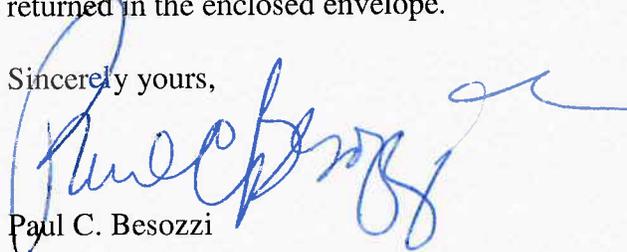
In accordance with the Procedural Order, dated February 27, 2014 (“Order”) and the Discovery Schedule reflected therein, enclosed for filing is an original of Securus Technologies, Inc.’s First Set Of Information Requests To Petitioners (“Requests”).

Per Section II.A.1. of the Order, the Requests are being electronically filed with the original and requisite copies prescribed by Section II.A.3. of the Order being sent by overnight delivery.

As envisioned by the Discovery Schedule, Securus reserves the right to serve further Information Requests on Petitioners in connection with all experts relied upon by the Petitioners, specifically including Mr. Douglas Dawson and any and all Declarations submitted by or otherwise included or referred to in the record of this proceeding relating to Mr. Dawson.

An extra copy of the Requests is enclosed to be stamped-in or otherwise marked as received and returned in the enclosed envelope.

Sincerely yours,


Paul C. Besozzi

cc: Service List for D.T.C. 11-16

Before the
Department of Telecommunications and Cable
Commonwealth of Massachusetts

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

SECURUS TECHNOLOGIES, INC.'S
FIRST SET OF INFORMATION REQUESTS TO PETITIONERS

INSTRUCTIONS

1. Each Information Request ("Request") should be answered in writing on a separate page. Each response should contain the question being answered. As to each separate answer, identify the person(s) supplying the information in the answer. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part or portion.
2. Responses must, at a minimum, be provided in accordance with the Discovery Schedule set forth in the Procedural Order, dated February 27, 2014, provided that responses may be provided as they become available.
3. All responses to these Requests should be amended when the respondent obtains information upon which (i) the respondent knows the response was incorrect when made, or (ii) the respondent knows the response was correct when made but is no longer accurate. Any amendments should be forwarded to Securus as soon as possible after the requirement for amendment is discovered. These Requests are deemed to be continuing in nature and require updated responses if the respondent learns of or obtains pertinent facts or documents not now in the respondent's possession.
4. To the extent that you object to a portion of any Request, respond to the portion of the Request that you do not contend is objectionable. Separately and clearly identify that part or aspect of each Request to which you object and each ground for such objection.
5. If you claim privilege as a ground for failing to respond to a Request, provide a response that does not contain allegedly privileged information or communications. Separately identify that part or aspect of each Request or response thereto for which you claim privilege and provide sufficient information about the withheld information so that your assertion of privilege can be analyzed, addressed and ultimately decided upon by the Department if necessary.

6. If any document responsive to these Requests is withheld, please identify each such document and the reasons for withholding the document. If the information is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
7. If any responsive information is deemed proprietary or confidential and you seek to have it made subject to a protective order or agreement, please immediately notify Securus, identifying which response(s) require such protection and providing a proposed form of protective order.
8. These Requests seek information or documents within the possession, custody or control of the entity to which these Requests are addressed, as well as each of its predecessors, successors, divisions, parents, subsidiaries, and affiliates, each other person directly or indirectly, wholly or in part, owned or controlled by it, each partnership to which any of them is a party, and all present and former directors, officers, employees, agents, consultants or other persons acting for or on behalf of any of them.
9. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files or tapes are included in the input and the source thereof, (b) the form of the data which constitute machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the databases utilized, and the programming to obtain the output.
10. If a Requests can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
11. If you cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why you cannot answer the Request in full, and state what information or knowledge is in your possession concerning the answered portions.
12. If, in answering any of these Requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using in responding to the Request.
13. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
14. Each request for information includes a request for all documentation which supports the response provided.

15. Provide copies of all requested documents. A response which does not provide the Securus with the responsive documents, and requests the Securus to inspect documents at any location is not responsive.
16. Unless otherwise set forth in an individual Requests, the time period covered by these Requests is from and after April 17, 1998 through the date hereof.

DEFINITIONS

1. The term "you" and "your" as used herein shall refer to the Petitioners and all present and former officers, directors, agents, employees, partners, parents, subsidiaries, affiliates, divisions, area or regional offices, predecessors-in-interest, servants, attorneys, consultants, and all other persons or entities acting or purporting to act on behalf of the Petitioners.
2. "Communication" means any transfer of information by written, oral, electronic, or any other means.
3. The term "document[s]" as used herein shall refer to the original, or a copy of the original if you do not possess the original, and all non-identical copies of any medium upon which intelligence or information is recorded or from which intelligence or information can be retrieved, including all copies that bear any additional file stamps, marginal notes, or other additional writings or markings not appearing in the original, regardless of origin or present location or custody, including but not limited to, papers, letters, telegrams, telefax messages, telecopy messages, telexes, electronic messages, text messages, notes or other summaries of oral communications, memoranda, typed or handwritten notes, sound or video recordings, voice-mail recordings, minutes, periodicals, magazines, newspaper, pamphlets, advertisements, articles, internal correspondence, reports, records, studies, contracts, statements, logs, audits, charts, legal instruments, declarations, filings, drafts, plans, drawings, diagrams, pictures, circulars, announcements, directives, schedules, specifications, standards, instructions, manuals, photographs, negatives, brochures, publications, statistical records, desk calendars, appointment books, diaries, business cards, computer disks (including both floppy disks and hard drives), CD-ROM, optical disks, all computer copy whether "hard" or "soft," computer tapes, printouts and memories, microfilm, accounts, budgets, journals, ledgers, bills, invoices, purchase orders, bids, checks, receipts, and the like, whether handwritten, typed, printed, coded, tape recorded, photographed, or otherwise made, including information stored, made or maintained by electronic, mechanical magnetic means, whether provided by you or third-party telecommunication service providers, including but not limited to electronic mail or "E-Mail." The term "document[s]" includes each and every draft, excerpt, revision or amendment of the above.
4. "Dawson Declarations" means the Declarations of Douglas Dawson and the attachments thereto referred to or included in the record of this proceeding.
5. "Department" means the Department of Telecommunications and Cable or its predecessor agencies.
6. "Evercom Systems, Inc." means Evercom and its successors, including Securus Technologies, Inc.

7. "FCC" means the Federal Communications Commission.
8. "Person" means any individual, partnership, firm, association, corporation, or other legal business entity.
9. "Petition" means, unless otherwise indicated, the original Petition Of Recipients Of Collect Calls From Prisoners At Correctional Institutions In Massachusetts Seeking Relief From The Unjust And Unreasonable Cost Of Such Calls, dated August 31, 2009, filed in this proceeding.
10. "Petitioners" means all those designated as petitioners in the Petition and Amendments Numbers 1 and 2 thereto.
11. The terms "and," "or" and "and/or" shall be construed conjunctively in order to bring within the scope of these Requests any information or documents which might otherwise be considered to be beyond their scope.
12. "Identify," when used in connection with a natural person, means to state that person's full name, present business and home address and present title and job description.
13. "Identify" or "state," when used with reference to a particular subject matter, means to state all facts that are known to you which refer or relate to that subject matter, to specify each event, occurrence and instance which refer or relate to that subject matter and to identify all persons having knowledge of that subject matter.
14. "Relate to," as used herein, means or refers to: consist of, constitute, contain, refer to, evidence, reflect, or be in any way logically or factually connected with, the matter discussed.
15. Terms not defined in these Requests shall have the respective meanings ascribed to such terms in this proceeding; if no meanings are ascribed to such terms in the proceedings, such terms shall have the ordinary and usual meanings.
16. Throughout these Requests, words used in the singular include the plural and vice versa.

INFORMATION REQUESTS

- SECURUS-1-1. On page 2 of Petition, Petitioners claim that the Department must determine what is just and reasonable based on "actual, necessarily incurred costs of providing prisoner telephone service plus a reasonable return on investment." Please identify and provide copies of all documents relating to and relied upon by Petitioners to support that claim.
- SECURUS-1-2. On page 2 of Petition, Petitioners claim that "state and most counties are required by law to use these funds for non-telephone objectives." Please identify and provide copies of all laws or regulations that impose this requirement.

- SECURUS-1-3. On page 3 of Petition, Petitioners claim that “the overwhelming majority of prisoner phone calls are paid from prepaid accounts....” Please identify and provide copies of all documents relating to and relied upon by Petitioners to support that claim.
- SECURUS-1-4. On page 4 of Petition, Petitioners claim that “gross annual telephone proceeds per prisoner bed average over \$1000 for many of the county facilities for which we have data,” citing “the last column of Appendix II, ‘Avg. Gross Proceeds Per Prisoner.’” Please identify provide copies of all documents relating to and relied upon in preparing the information reflected in the “last column of Appendix II” and supporting the \$1000 figure.
- SECURUS-1-5. On page 5 of Petition Petitioners claim that “[p]risoners tend to come from the poorest communities in the state.” Please identify provide copies of all documents relating to and relied upon to support this claim.
- SECURUS-1-6. On page 5 of Petition, Petitioners refer to a “half century of studies.” Please provide a list of all such studies and copies of all documents cited Appendix III not available online (where certain pages are cited or relied upon only those pages need to be provided).
- SECURUS-1-7. On page 6 of Petition, Petitioners claim that Massachusetts Legal Services paid “almost \$4000 in charges for phone calls from county prisoners last year.”
- a. What year is “last year” and how many calls were involved?
 - b. What was the average length of such calls?
 - c. Were all county prisoner calls referenced in-state Massachusetts calls? If not, please provide a breakdown of the number of calls and amounts charged between in-state MA calls and calls received from other states (Interstate calls).
 - d. Please identify and provide copies of relevant billing records or other documents relating to and relied upon to support the “almost \$4000 in charges” figure.
- SECURUS-1-8. On page 6 of Petition, Petitioners claim that the Committee for Public Counsel Services paid “over \$100,000 for collect and prepaid phone calls from prisoners in 2008.”
- a. How many calls were involved?
 - b. What was the average length of such calls?

- c. Please provide a breakdown of the number of calls and amounts charged between in-state MA calls and calls received from other states (Interstate calls)
- d. Please identify and provide copies of relevant billing records or other documents relating to and relied upon to support the "over \$100,000 figure."

SECURUS-1-9. On page 7 of Petition, Petitioners claim that "commissions are now the single largest component of prisoner payphone costs in Massachusetts, ranging from 30% to more than 52% of gross telephone revenues." Please identify and provide copies of all documents relating to and relied upon in support of this claim, including all documents relied upon in preparing the relevant component of Appendix II cited in footnote 12 of the Petition.

SECURUS-1-10. On page 8 of Petition, Petitioners claim that since the 1998 Order was issued the special costs cited by the Department "have been almost entirely eliminated." Please identify and provide copies of all documents, other than Dawson Declarations, relating to and relied upon in support of this claim.

SECURUS-1-11. On pages 11-12 of Petition, Petitioners claim that commissions paid by prisoner telephone service providers in Massachusetts are the "single largest category of prisoner payphone expense incurred by providers." Please identify and provide copies of all documents relating to and relied upon in support of this claim.

SECURUS-1-12. On page 13 of Petition, Petitioners claim that "[h]alf of the counties in the state are required by statute to pay telephone commissions into these funds." Please identify such statutes, including citations, and provide copies of all such statutes identified.

SECURUS-1-13. On page 15 of Petition, Petitioners claim that "the need for an extraordinary per call charge to fund the special cost categories enumerated by the DTE no longer exists." Please identify and provide copies of all documents, other than Dawson Declarations, relating to and relied upon in support of this claim

SECURUS-1-14. On page 15 of Petition, footnote 23 there is reference to Appendix V. Please identify and provide copies of all documents relating to and relied upon in preparing Appendix V.

SECURUS-1-15. On page 16 of Petition, Petitioners reference is made to "column 8 of Appendix IV, 2008 IntraLATA rates...." Please identify and provide copies of all documents relating to and relied upon in preparing column 8 of Appendix IV.

SECURUS-1-16. On page 16 of Petition, Petitioners claim that "costs in all expense categories are lower and continue to decline as improved technologies make telephone operations more efficient." Please identify and provide copies of all documents, other than Dawson Declarations, relating to and relied upon in support of this claim

- SECURUS-1-17. On page 16 of Petition, Petitioners claim that there have been “considerable cost savings over the past decade as communications technologies have continued to advance, tighter payment safeguards have been imposed and the industry itself has undergone widespread consolidation resulting in significant economies of scale.”
- a. Please define “considerable.” Please identify and provide all documents relied upon to support such definition.
 - b. Please identify and provide copies of all documents, other than Dawson Declarations, relied upon to support such claim.
- SECURUS-1-18. On page 17 of the Petition, Petitioners claim that “live operators and the high wages and infrastructure needed to support them are a thing of the past.”
- a. When was the last time that live operators were used in the provision of inmate calling service in Massachusetts? By whom?
 - b. Please identify and provide copies of all documents relating to and relied upon to establish when and how live operators were employed in the provision of inmate calling services in Massachusetts.
- SECURUS-1-19. On page 18 of Petition, Petitioners claim that “[a]dvanced recording devices developed since the 1998 Order make it possible to record and monitor calls...more efficiently and cheaply.” Please identify and provide copies of all documents, other than Dawson Declarations, relating to and relied upon to support this claim.
- SECURUS-1-20. On page 18 of Petition, Petitioners claim that there has been a “substantial elimination of uncollectibles” and “[u]ncollectibles essentially vanish....” Please identify and provide copies of all documents, other than Dawson Declarations, relating to and relied upon in support of that claim.
- SECURUS-1-21. On page 19 of Petition, Petitioners claim that “truly collect calls are generally available only to the most financially responsible and credit-worthy third parties.” Please identify and provide copies of all documents relating to and relied upon in support of that claim.
- SECURUS-1-22. On page 19 of Petition, Petitioners claim that the “only individuals and entities that are generally exempted from the prepaid requirement are lawyers and government agencies....” and there are “some exceptions for individuals with certain local providers, like Verizon, that have a contractual relationship with the prison payphone provider...” Please identify and provide copies of all documents relating to and relied upon in support of that claim.
- SECURUS-1-23. On page 20, footnote 40, of Petition, Petitioners refer to an email from John Reynolds, Economist, Telecommunications Bureau, New Mexico Public Regulations Commission. Please provide a copy of that email.

- SECURUS-1-24. On page 20 of Petition, Petitioners claim “dramatic reductions as personnel costs fall by eliminating live operators and shifting virtually all of their functions to computers...” and “through mergers and acquisitions that have resulted in unprecedented consolidation...and accompanying centralization.” Please identify and provide copies of all documents, other than Dawson Declarations or those cited in the relevant footnotes, relating to and relied upon in support of this claim.
- SECURUS-1-25. On page 20 of Petition, Petitioners claim that that there has been “centralization allowed by new switching technologies.”
- a. Please define the term “new switching technologies.”
 - b. Please identify and provide copies of all documents, other than Dawson Declarations and those cited in the relevant footnotes, relating to and relied upon in support of that claim.
- SECURUS-1-26. On page 21 of Petition, Petitioners claim “huge savings from reduced labor costs on a per call basis...” Please quantify the reduced labor costs on a per call basis and identify and provide copies of all documents relating to and relied upon in making such calculation.
- SECURUS-1-27. On page 23 of Petition, Petitioners calculate that a “\$6 call actually ends up costing \$6.83; a \$10 call ends up costing \$11.39.”
- a. What is the length of each call?
 - b. Please explain how Petitioners made these calculations.
 - c. Please identify and provide copies of all documents relating to and relied upon in making these calculations.
- SECURUS-1-28. On page 23 of Petition, Petitioners claim that “Evercom charges a 14% service fee.” Please explain how Petitioners calculated this percentage and identify and provide copies of all documents relating to and relied upon in making such calculation.
- SECURUS-1-29. On page 25 of Petition, Petitioners claim that “at least two-thirds of individuals incarcerated in Norfolk County are actually from the county...” Please identify and provide copies of all documents relating to and relied upon in support of that claim.
- SECURUS-1-30. On page 25 of Petition, Petitioners provide information on a 15-minute intraLata collect call in Hampden County and commission payments to the Inmates Commissary Fund for the period December 2005 to November 2006. Please identify and provide copies of all documents relating to and relied upon in preparing those calculations.

- SECURUS-1-31. On page 25-26 of Petition, and in footnote 50 on page 26, Petitioners provide certain calculations regarding the price of a 15-minute local and intraLATA calls in Worcester County. Please identify and provide copies of all documents relating to and relied upon in preparing those calculations on pages 25 and 26 and footnote 50.
- SECURUS-1-32. On page 27 of Petition, Petitioner sets forth a table relating to commissions paid to the Barnstable HOC Canteen Fund. Please identify and provide copies of all documents relating to and relied upon in preparing that table.
- SECURUS-1-33. On page 28 of Petition, Petitioners claim that “at least five Massachusetts counties *increased* their surcharges in the same general time frame, and a sixth imposed a surcharge that qualifies as the second highest in the country.” Please identify and provide copies of all documents relating to and relied upon to support that claim.
- SECURUS-1-34. On page 28 of Petition, Petitioners claim that “along with Arkansas and Minnesota, Massachusetts counties now charge the highest per call surcharges in the country for instate calls.” Please identify and provide copies of all documents relating to and relied upon to support that claim.
- SECURUS-1-35. On page 28 of Petition, reference is made in footnote 55 to correspondence in September 2008 with Board members of Colorado CURE. Please provide a copy of such correspondence.
- SECURUS-1-36. On page 29 of Petition in continuation of footnote 58 reference is made to Appendix II. Please identify and provide copies of all documents relating to and relied upon in preparing Appendix II.
- SECURUS-1-37. On page 29 of Petition in footnote 59 reference is made to “column 7 of Appendix IV.” Please identify and provide copies of all documents relating to and relied upon in preparing column 7 of Appendix IV.
- SECURUS-1-38. On page 29 of Petition in footnote 60 reference is made to the “last column of Appendix VI.” Please identify and provide copies of all documents relating to and relied upon in preparing the last column of Appendix VI.
- SECURUS-1-39. On page 29 of Petition, Petitioners claim that “[v]irtually none of the commissions are used for telephone or telephone security related purposes.” Please define “telephone or telephone security related purposes” and “virtually none.” If virtually none is greater than “0” what percentage are used for such purposes?
- SECURUS-1-40. On page 30 of Petition, Petitioners cite to the American Correctional Association policy in footnote 62.
- a. Please provide a copy of the cited policy.

- b. Please define the terms "general public" and "like services" as those terms are used in the policy? Please identify and provide copies of all documents relating to and relied upon in support of your definition.

- SECURUS-1-41. On page 30 of Petition, Petitioners refer to "enormous deviations in rates from those charged to the general public." Specifically, what rates charged to the "general public" for what services are Petitioners referring to?
- SECURUS-1-42. To the extent not previously requested, please provide identify and provide copies of all documents relating to and relied upon in preparing all Appendices to the Petition.
- SECURUS-1-43. On page 3 of the Amendment #1 and Supplement On Quality of Service ("Amendment #1"), Petitioners indicate that each of Petitioners requested prisoner telephone service. Please identify and provide copies of all documents other than the Affidavits of Petitioners, relating to and relied upon as a basis for the claim that each of Petitioners requested such service.
- SECURUS-1-44. On page 3 of Amendment #1, reference is made to Petitioners as "customer of record" of Evercom Systems, Inc. and Correctional Billing Services, Inc. Please identify and provide copies of all documents, other than the Affidavits of Petitioners, relating to and relied upon to support the claims that certain Petitioners are "customers of record" of Evercom Systems, Inc. and/or Correctional Billing Services, Inc.
- SECURUS-1-45. With respect to Appendix 1 to Amendment #1, please identify and provide copies of all documents, other than the Affidavits of Petitioners, relating to and relied upon in preparing said Appendix 1.
- SECURUS-1-46. On page 5 of Amendment #1, Petitioners state that "data in this section are drawn primarily from Affidavits submitted by Petitioners." Please identify and provide copies of all other documents, other than said Affidavits, relating to and relied upon in preparing the data in Section IV relating to Evercom Systems, Inc. or Correctional Billing Services, Inc.
- SECURUS-1-47. Please identify and provide copies of all documents, other than the Affidavits of Petitioners, reflecting complaints or comments or requests submitted by Petitioners to Evercom Systems, Inc., Correctional Billing Services, Inc. the Department, the FCC, or any other Federal or State agency or office or private agency or office, including the Massachusetts Office of Consumer Affairs and Business Regulation and Better Business Bureau in connection with the claims relating to "connection problems", disconnected calls, "call reporting and details of charges", or "customer service problems" as discussed in Sections IV.A.ii., IV.B.ii., IV.C.ii. and IV.D.ii. of Amendment #1, including all billing records, service adjustments or other statements reflecting any calls referred to and when such calls were made.

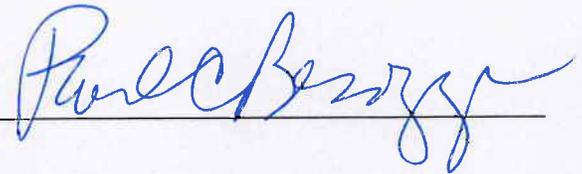
- SECURUS-1-48. With respect to the Petitioners added by Amendment #2 – Additional Petitioners, please identify and provide copies of all documents, other than the Affidavits supplied by the Additional Petitioners, relating to and relied upon to establish that each of the Additional Petitioners receives telephone calls from prisoners in state or county correctional facilities in Massachusetts, including any billing statements or other form of customer records reflecting any calls referred to and when such calls were made.
- SECURUS-1-49. With respect to the Petitioners added by Amendment #2 – Additional Petitioners please identify and provide copies of all documents, other than the Affidavits of Petitioners, reflecting complaints or comments or requests submitted by Petitioners to Evercom Systems, Inc., Correctional Billing Services, Inc. the Department, the FCC, or any other Federal or State agency or office or private agency or office, including the Massachusetts Office of Consumer Affairs and Business Regulation and Better Business Bureau in connection with the claims reflected in the Affidavits of the Additional Petitioners.
- SECURUS-1-50. Please provide a copy of Appendix C to Inmate Fees As a Source of Revenue: Review of Challenges. Report of Special Commission to Study the Feasibility of Establishing Inmate Fees, Massachusetts Executive Office of Public Safety AND Security, July 1, 2001.
- SECURUS-1-51. Please identify and provide all other documents not previously identified or requested which Petitioners rely upon in support of their Petition in connection with the issues that are the subject of the Department's proceeding as reflected in the Hearing Officer Interlocutory Decision of September 23, 2013.

CERTIFICATE OF SERVICE

I, Paul C. Besozzi, hereby certify that on this 10th day of March, 2014, the foregoing "Securus Technologies, Inc.'s First Set Of Information Requests To Petitioners" was served on the parties listed on the Service List below issued by the Department by the method listed under each such party:

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|---|---|
| <p>Kalun Lee Hearing Officer Department of Telecommunications and Cable 1000 Washington Street, 8th Floor, Suite 820 Boston MA 02118-6500 kalun.lee@state.ma.us Electronic and Overnight Mail</p> | <p>Betsy Whittey Hearing Officer Department of Telecommunications and Cable 1000 Washington Street, 8th Floor, Suite 820 Boston MA 02118-6500 betsy.whittey@state.ma.us Electronic and Overnight Mail</p> |
| <p>Paul Abbott General Counsel Department of Telecommunications and Cable 1000 Washington Street, 8th Floor, Suite 820 Boston MA 02118-6500 paul.abbott@state.ma.us Electronic and Overnight Mail</p> | <p>Karlen Reed Director, Competition Division Department of Telecommunications and Cable 1000 Washington Street, 8th Floor, Suite 820 Boston MA 02118-6500 karlen.reed@state.ma.us Electronic and Overnight Mail</p> |
| <p>Ben Dobbs Deputy Director ,Competition Division Department of Telecommunications and Cable 1000 Washington Street, 8th Floor, Suite 820 Boston MA 02118-6500 benedict.dobbs@state.ma.us Electronic and Overnight Mail</p> | <p>Joseph Tiernan Competition Division Department of Telecommunications and Cable 1000 Washington Street, 8th Floor, Suite 820 Boston MA 02118-6500 joseph.tiernan@state.ma.us Electronic and Overnight Mail</p> |
| <p>James Pingeon, Esq. Bonita Tenneriello, Esq. Elizabeth Matos, Esq. Alphonse Kamanzi Prisoners' Legal Services, Inc. 10 Winthrop Square, 3rd Floor Boston, MA 02110 jpingeon@plsma.org btenneriello@plsma.org lmatos@plsma.org akamanzi@plsma.org Electronic and Overnight Mail</p> | <p>Patricia Garin, Esq. Stern, Shapiro, Weisberg & Garin 90 Canal St., 5th Floor Boston, MA 02114 pgarin@sswg.com Electronic and Overnight Mail</p> |

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| <p>Ken Dawson VP Contracts & Regulatory Inmate Calling Solutions, LLC d/b/a ICSolutions 2200 Danbury St. San Antonio, TX 78217 kdawson@icsolutions.com Electronic and Overnight Mail</p> | <p>Curtis Hopfinger Director, Regulatory and Government Affairs Securus Technologies, Inc. 14651 Dallas Parkway, Ste. 600 Dallas, TX 75254 chopfinger@csecurstech.net Electronic Mail</p> |
| <p>Chèrie Kiser Angela F. Collins Cahill Gordon & Reindel LLP 1990 K Street NW Suite 950 Washington DC 20006 ckiser@cgrdc.com acollins@cgrdc.com Electronic and Overnight Mail</p> | <p>Catrice C. Williams Secretary Department of Telecommunications and Cable 1000 Washington Street, 8th Floor, Suite 820 Boston MA 02118-6500 catrice.williams@state.ma.us dte.efiling@state.ma.us Electronic and Overnight Mail</p> |



Paul C. Besozzi