

August 2, 2016

VIA ELECTRONIC AND OVERNIGHT FILING

Ms. Sara Clark
Secretary
Department of Telecommunications & Cable
Commonwealth of Massachusetts
1000 Washington Street, Suite #820
Boston, Massachusetts 02118

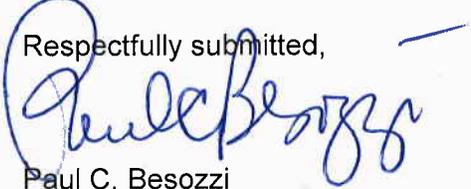
Re: D.T.C. 11-16 - Petition of Recipients of Collect Calls from Prisoners at Correctional Institutions in Massachusetts Seeking Relief from the Unjust and Unreasonable Cost of such Calls – Notice of Securus Technologies, Inc.

Dear Ms. Clark:

Securus hereby files in this docket a copy of its previous correspondence concerning the withdrawal and cancellation of its Massachusetts Tariff No. 1, effective August 1, 2016.

An extra copy of this letter is enclosed to be stamped "received" or equivalent and returned in the enclosed envelope. A copy is being served on all parties on the Department's service list. Please remove Securus from that list.

Should you have any questions or comments regarding this filing, please contact the undersigned counsel.

Respectfully submitted,


Paul C. Besozzi
Counsel for Securus Technologies, Inc.

cc: James M. Avery
D.T.C. 11-16 Service List

James M. Avery

100 Summer Street
Suite 2250
Boston, MA 02110

617.488.8125 voice
617.824.2020 fax
javery@pierceatwood.com
www.pierceatwood.com

Admitted in: MA

July 1, 2016

HAND DELIVER and EMAIL

Sara Clark, Secretary
Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, Massachusetts 02118

Re: Securus Technologies, Inc.

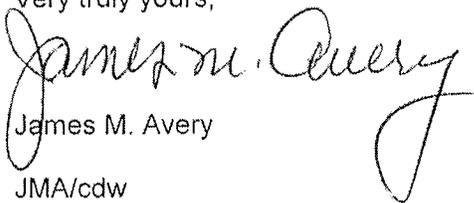
Dear Ms. Clark:

Pursuant to my informational letter dated June 28, 2016 to Sandra Callahan Merrick, General Counsel, enclosed please find a notice from Securus Technologies, Inc. withdrawing and cancelling M.D.T.C. Tariff No. 1.

Please contact me if you have any questions with respect to this matter.

Thank you for your consideration.

Very truly yours,


James M. Avery

JMA/cdw
Enclosure

cc: Sandra Callahan Merrick, General Counsel (via hand delivery and email)
Curtis L. Hopfinger, Director, Regulatory & Government Affairs (email)
Paul C. Besozzi, Esq. (email)



July 1, 2016

VIA HAND DELIVERY

Sara Clark, Secretary
Department of Telecommunications and Cable
Commonwealth of Massachusetts
1000 Washington Street, Suite #820
Boston, Massachusetts 02118

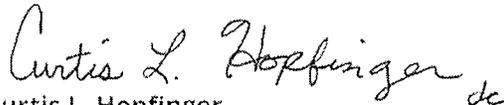
Re: Notification of Withdrawal and Cancellation of M.D.T.C. Tariff No. 1 - Securus Technologies, Inc.

Dear Ms. Clark:

Securus Technologies, Inc. ("Securus") provides inmate calling services ("ICS") in the Commonwealth of Massachusetts pursuant to its M.D.T.C. Tariff No. 1 ("MDTC Tariff").

As Securus recently notified the Department of Telecommunications and Cable ("Department"), Securus's current ICS services are IP-Enabled services as defined in Subsection (a) of Section 6A Mass. Gen. Laws c. 25C. Therefore, the limitations in Subsection (b) of Section 6A are applicable to the rates, terms and conditions of Securus's ongoing ICS service. Consistent with those provisions and its June 28 notification, Securus hereby withdraws and cancels the MDTC Tariff effective August 1, 2016.

Respectfully Submitted,


Curtis L. Hopfinger
Director, Regulatory and Government Affairs

James M. Avery

100 Summer Street
Suite 2250
Boston, MA 02110

617.488.8125 voice
617.824.2020 fax
javery@pierceatwood.com
www.pierceatwood.com

Admitted in: MA

June 28, 2016

HAND DELIVER and EMAIL

Sandra Callahan Merrick, General Counsel
Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, Massachusetts 02118

Re: Securus Technologies, Inc.

Dear Ms. Merrick:

Consistent with our discussion of Friday, June 24, 2016, this letter sets forth the position of Securus Technologies, Inc. ("Securus" or the "Company") concerning the application of Mass. Gen. Laws c. 25C, § 6A (2016) ("Section 6A") to the Company's Internet Protocol-based inmate calling services provided in the Commonwealth of Massachusetts.

As you know, Subsection (b) of Section 6A (emphasis added) provides guidance with respect to the jurisdiction of the Massachusetts Department of Telecommunications and Cable ("Department" or "DTC"):

Except as set forth in subsections (c) to (f), inclusive, and notwithstanding any other general or special law to the contrary, no department, agency, commission or political subdivision of the commonwealth, shall enact, adopt or enforce, either directly or indirectly, any law, rule, regulation, ordinance, standard, order or other provision having the force or effect of law that regulates or has the effect of regulating, the entry, rates, terms or conditions of VoIP Service or IP enabled service.

Subsection (a) of Section 6A defines an "IP-enabled service" as follows:

[S]ervice, capability, functionality, or application provided using Internet Protocol, or any successor protocol, that enables an end user to send or receive a communication in Internet Protocol format or any successor format, regardless of technology; provided, however, that no service included within the definition of "Voice over Internet Protocol service" shall be included within this definition.

Sandra Callahan Merrick, General Counsel
Department of Telecommunications and Cable
June 28, 2016
Page

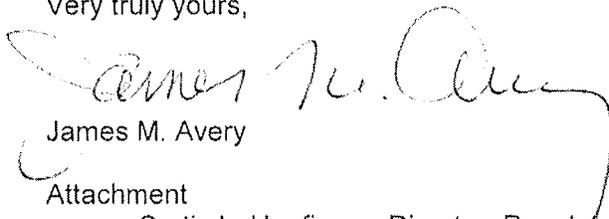
Securus's inmate calling services fall squarely within the definition of an "IP-enabled service." Specifically, Securus uses session initiation protocol ("SIP") - an Internet protocol format - to send inmate-initiated communications services through the entire course of the call until delivered to the terminating landline or wireless carrier. For your convenience, I have attached hereto a diagram that provides a full description of the Securus system's call flows using SIP to send these communications.

In light of the foregoing restrictions on the Department's jurisdiction over the rates, terms, and conditions of IP-enabled services like Securus's, the Company intends to withdraw its M.D.T.C. Tariff No. 1 (currently on file with the DTC) effective August 1, 2016.

Please feel free to contact me with any questions related to this matter.

Thank you for your consideration.

Very truly yours,



James M. Avery

Attachment

cc: Curtis L. Hopfinger, Director, Regulatory & Government Affairs
Paul C. Besozzi, Esq.



SECURUS
TECHNOLOGIES

SCP Centralized System – Path of Inmate Call

