

September 27, 2013

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BY FEDERAL EXPRESS

Catrice C. Williams, Secretary
Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, MA 02118-6500

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 ("Petition") – Docket No. 11-16

Dear Secretary Williams:

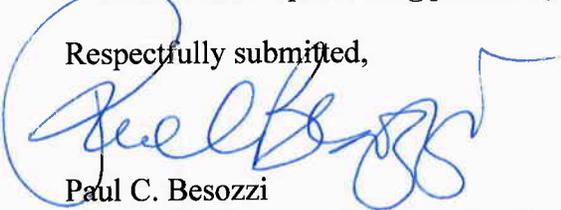
In accordance with 220 CMR Section 1.02:(5), enclosed for filing in the referenced Docket are an original and three (3) copies of a motion to extend the time within which the parties must respond to any appeal of the Hearing Officer's Interlocutory Order, dated September 23, 2013.

Copies of the foregoing documents are simultaneously being served on all parties listed on the official Service List issued by the Department.

An extra copy of each filing is enclosed to be stamped "received" or "filed" and returned in the enclosed envelope.

Please direct any questions concerning these filings to the undersigned at 202-456-5292 or pbesozzi@pattonboggs.com.

Respectfully submitted,


Paul C. Besozzi
Counsel for Securus Technologies, Inc.

4818-6088-9105

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

**Petition Of Recipients Of Collect Calls
From Prisoners at Correctional Institutions
In Massachusetts Seeking Relief from the Unjust
And Unreasonable Cost of such Calls**

DTC Docket No. 11-16

MOTION FOR EXTENSION OF TIME

In accordance with the provisions of 220 CMR 1.02:(5), Securus Technologies, Inc. (“Securus” or “Company”) acting through undersigned counsel, does hereby move for an extension of time (“Motion”), to and including October 28, 2013, in which to respond to any appeal that might be filed of the Hearing Officer Interlocutory Ruling, dated September 23, 2013 (“Order”), in this proceeding. This is an extension of ten (10) days beyond the current response date of October 26, 2013. In support of its Motion, Securus sets forth the following grounds:

1. The Order granted the parties five (5) days to file an appeal thereof and two (2) days for any response thereto. On September 26, 2013, the Prisoners’ Legal Service (“PLS”) sought an extension of time to file any appeal until October 18, 2013. The PLS request was based, in part, on the need to consult with their expert witness about filing an appeal and then, if a decision is made to do so, to obtain his assistance. Also, the expert witness’ and counsel’s schedule were cited. On the same day, the Hearing Officer granted an extension until October 16, 2013 for the parties to file any appeals, but left the response deadline at two (2) days (i.e., October 18, 2013).

2. At this point, none of the parties is aware of the potential extent of any appeal and the scope and extent of issues that might be raised on appeal. If, for example, the PLS were to

submit an appeal which included an additional or expanded declaration of their expert or other supporting materials, Securus respectfully submits that reviewing the substance thereof and formulating a focused, fully-informed and complete response thereto would take more than two (2) days. The same competing time demands would likely pertain over a two-day period. Securus believes that it would be in the interest of the Department and the parties to provide a reasonable additional period of time for responses, just as the Hearing Officer has provided for any appeals of the Order itself.

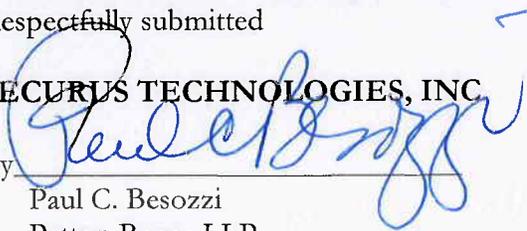
3. The Department's rules permit the Hearing Officer to extend any time limit prescribed or allowed by 220 CMR 1.00 to be extended "for good cause shown." 220 CMR 1.02:(5). Securus respectfully submits that for the foregoing reasons the time for providing responses to any appeals filed should be extend until and including October 28, 2013. This is an extension of ten (10) days over the current October 18, 2013 date and would, of course, apply to all parties.

WHEREFORE, for all of the foregoing reasons, Securus respectfully moves that the Department extend the time for Securus to respond to any appeal of the Order by ten (10) days to and including Monday, October 28, 2013.

Respectfully submitted

SECURUS TECHNOLOGIES, INC.

By


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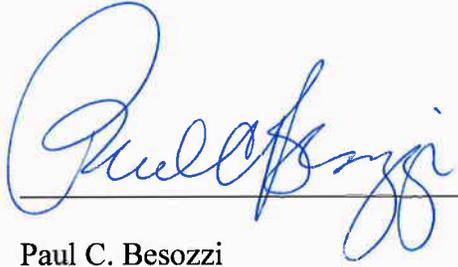
Dated: September 27, 2103

CERTIFICATE OF SERVICE

I, Paul C. Besozzi, hereby certify that on this 27th day of September, 2013, I did serve, by Federal Express or first class mail, postage prepaid or by electronic mail a copy of the foregoing “Motion For Extension Of Time” on the parties listed on the Service List below issued by the Department:

<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</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</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</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</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</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</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</p>	<p>Patricia Garin, Esq. Stern, Shapiro, Weisberg & Garin 90 Canal St., 5th Floor Boston, MA 02114 pgarin@sswg.com</p>

<p>Ken Dawson VP Contracts & Regulatory Inmate Calling Solutions, LLC d/b/a ICSolutions 2200 Danbury St. San Antonio, TX 78217 kdawson@icsolutions.com</p>	<p>Curtis Hopfinger Director, Regulatory and Government Affairs Securus Technologies, Inc. 14651 Dallas Parkway, Ste. 600 Dallas, TX 75254 chopfinger@csecurstech.net</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</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</p>



Paul C. Besozzi