

April 15, 2014

Paul C. Besozzi
202-457-5292
pbsozzi@pattonboggs.com

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 Motion For Extension Of Time

Dear Ms. Williams:

In accordance with 220 CMR 1.02:(5) and Section II.C. of the Procedural Order, dated February 27, 2014 (“Order”), enclosed for filing is an original of Securus Technologies, Inc.’s Motion For Extension Of Time (“Motion”).

The Motion seeks to extend the time for parties responding and objecting to initial non-expert discovery and for serving discovery motions on the first set of discovery.

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

An extra copy of the Motion 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

4841-1399-4778, v. 1

**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) and Section II.C. of the Procedural Order, dated February 27, 2014¹, Securus Technologies, Inc. (“Securus” or “Company”), acting through undersigned counsel, does hereby move for an extension of time (“Motion”), to and including April 29, 2014, for the Securus and the other parties served with initial, non-expert discovery requests in this investigation to provide responses and objections to those requests. Further, Securus moves that the time for serving discovery motions on this first set of discovery be extended to and including May 30, 2014. In support of its Motion, Securus sets forth the following grounds:

1. The Procedural Order includes a discovery schedule which calls for responses and objections to initial non-expert discovery by April 22, 2014, with discovery motions on the first set of discovery to be served by May 20, 2014.²

¹ 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, Procedural Order, February 27, 2014, p. 3 (Procedural Order).

² Procedural Order, p. 1.

2. Securus and its counsel have been proceeding diligently to meet the April 22, 2014 date. However, the death of an immediate family member of counsel for Securus will now require him to be out of the office and unavailable early in the week that the responses and objections are due and thus unable to effectively coordinate the finalization and assembly of the responses for Securus. Therefore, Securus is seeking a brief extension of one week in the previous schedule for filing responses and objections (i.e., from April 22 until April 29) to permit counsel to attend to family responsibilities. Further, in the interest of preserving the time for preparing any discovery motions, Securus seeks an extension from May 20 until May 30 to file such motions.³ These extensions would apply to all parties in the investigation.

3. Counsel for Petitioners and for Global Tel Link have authorized Securus to represent that they have no objections to the requested extensions. Inmate Calling Solutions, LLC has similarly authorized Securus to indicate that it has no objection.

4. 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 and objections to initial non-expert discovery should be extended to and including April 29, 2014 and the time for serving discovery motions on this first set of discovery should be extended to and including May 30, 2014. Again, in each case the extensions would apply to all parties.

WHEREFORE, for all of the foregoing reasons, Securus respectfully moves that the Department extend the time for providing responses and objections to the initial non-expert

³Securus notes that a one-week extension would require motions to be served the day after Memorial Day holiday.

discovery to and including April 29, 2014 and extend the time for serving discovery motions on the first set of discovery to and including May 30, 2014.

Respectfully submitted,

SECURUS TECHNOLOGIES, INC.

By


Paul C. Besozzi
Patton Boggs LLP
2550 M Street NW
Washington DC 20037
202-457-5292

Dated: April 15, 2014

CERTIFICATE OF SERVICE

I, Paul C. Besozzi, hereby certify that on this 15th day of April, 2014, 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>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>	<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>



Paul C. Besozzi