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*ADMITTED IN DC ONLY

May 16, 2014

Via Electronic Mail and Federal Express

Catrice C. Williams
Secretary
Department of Telecommunications and Cable
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**

Dear Secretary Williams:

Global Tel*Link Corporation ("GTL"), by its attorneys, hereby respectfully submits this filing seeking leave to submit a letter in response to Petitioners' Proposed Surreply to Global Tel*Link's Motion for Confidential Treatment and Motion for Leave to File Surreply ("Surreply") filed on May 15, 2014. Three (3) copies of this submission have been sent to the Hearing Officer, and one copy has been sent to each Department staff member listed on the service list per the Procedural Order issued February 27, 2014.

If you have any questions concerning this matter, please contact the undersigned.

Respectfully submitted,


Chérie R. Kiser

Counsel for Global Tel*Link Corporation

Enclosures
cc: Service List

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Dear Secretary Williams:

Global Tel*Link Corporation ("GTL"), by its attorneys, hereby seeks leave to submit this letter in response to Petitioners' Proposed Surreply to Global Tel*Link's Motion for Confidential Treatment and Motion for Leave to File Surreply ("Surreply") filed on May 15, 2014.¹

Petitioners' assert GTL has not met its burden for seeking confidential treatment, while at the same time admitting "Petitioners do not here address in substance each of GTL's confidentiality assertions" (Surreply at 2, 3). As GTL explained in its Opposition to Petitioners' Motion for Leave to Late-File, Petitioners are not entitled to an open-ended right to respond to GTL's Motion for Confidential Treatment. The *Procedural Order* in this case and the Department's rules and precedent specify the time for responding to motions and the showing necessary to oppose a request

¹ GTL's Opposition to Petitioners' Motion for Leave to Late-File was not a "reply" in support of GTL's Motion for Confidential Treatment. It was an opposition to Petitioners' requests to late-file their response to GTL's motion and to have an open-ended right to provide a further response to GTL's confidential designations. See Petitioners' Proposed Surreply at 1.

for confidential treatment. Petitioners have not met the prescribed timeframe for responding to motions and have not provided a showing sufficient to support a challenge of confidential treatment that satisfies the Department's rules and precedent.

Petitioners claim they cannot timely challenge GTL's confidentiality request because they have not been provided with access to the confidential information, and ask for an extension to June 30, 2014 to challenge GTL's request for confidentiality (Surreply at 6). This extension request should be denied. GTL has sought confidential treatment for: 1) the number of intrastate calls completed for each Massachusetts correctional facility customer it serves, as well as the number of calls it has completed nationwide; and 2) the number of complaints it has received for each of its Massachusetts correctional facility customers and nationwide. GTL has redacted only the numbers; it has not redacted the accompanying discussion or context surrounding those confidential numbers. Petitioners do not need the specific numbers to challenge the substance of GTL's request for confidentiality.

GTL is entitled to confidential treatment for the identified portions of its interrogatory responses. The fact that Petitioners' may have obtained access to other GTL customer call volume data does not diminish GTL's need for confidentiality. The information Petitioners' attach to their Surreply is customer proprietary network information ("CPNI") that Petitioners obtained from GTL's correctional facility customers.²

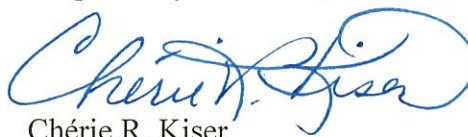
Under Section 222 of the federal Communications Act of 1934, as amended, and the implementing rules of the Federal Communications Commission, GTL is not permitted to divulge CPNI, which is information relating to the quantity, technical configuration, type, destination, and amount of use of a telecommunications service and information contained in the bills pertaining to telephone exchange service or telephone toll service. 47 U.S.C. § 222(a), (f)(1); 47 C.F.R. § 64.2005. The documents attached to Petitioners' Surreply squarely fall within the definition of CPNI as they are copies of bills GTL provides to its customers, and contain information regarding the quantity and amount of telecommunications service being received by the customer. While a customer may provide such information to Petitioners, GTL is legally obligated to protect such information from disclosure under the law.

Accordingly, GTL respectfully requests that the Department grant its Motion for Confidential Treatment.

² GTL notes, however, that Petitioners attach information from the Hampshire County Sheriff's Office, which is not served by GTL and is marked as "CONFIDENTIAL - PROPRIETARY INFORMATION."

If you have any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Chérie R. Kiser", with a large, stylized flourish at the end.

Chérie R. Kiser

Counsel for Global Tel*Link Corporation

cc: Service List