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\*ADMITTED IN DC ONLY

April 29, 2014

**Via Electronic Mail and U.S. Mail**

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 the **PUBLIC VERSION** of its Responses and Objections to Petitioners' First Set of Interrogatories and a Motion for Confidential Treatment. Three (3) copies of this submission have been mailed to the Hearing Officer, and one copy has been mailed to each Department staff member listed on the service list per the Procedural Order issued February 27, 2014. In addition, GTL has provided the Hearing Officer with the **CONFIDENTIAL VERSION** of its Responses and Objections to Petitioners' First Set of Interrogatories in a sealed envelope along with a CD-ROM, both of which are labeled "CONFIDENTIAL" in accordance with the requirements of the Procedural Order. The **CONFIDENTIAL VERSION** of GTL's Responses and Objections to Petitioners' First Set of Interrogatories will be served on the parties to this proceeding upon execution of a mutually-agreeable Non-Disclosure Agreement between the parties.

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". The signature is fluid and cursive, with a large loop at the end of the last name.

Chérie R. Kiser

Counsel for Global Tel\*Link Corporation

Enclosures

cc: Service List

**Before the  
COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

	)	
Petition of Recipients of Collect Calls from Prisoners	)	
at Correctional Institutions in Massachusetts Seeking	)	D.T.C. 11-16
Relief from the Unjust and Unreasonable	)	
Cost of Such Calls	)	
	)	

**GLOBAL TEL\*LINK CORPORATION’S RESPONSES AND OBJECTIONS  
TO PETITIONERS’ FIRST SET OF INTERROGATORIES**

Global Tel\*Link Corporation (“GTL”), by and through its attorneys, hereby provides the following Responses and Objections to Petitioners’ First Set of Interrogatories (“Interrogatories”), which counsel for GTL received via electronic mail from Prisoners’ Legal Services on March 10, 2014.

**GENERAL OBJECTIONS**

1. GTL objects to the Interrogatories to the extent they seek information that is not relevant to the subject matter of this proceeding and are not reasonably calculated to lead to the discovery of admissible evidence. In its September 23, 2013 *Interlocutory Order*, the Department of Telecommunications and Cable (the “DTC”) limited the scope of this proceeding to “the per-call surcharge assessed by ICS [inmate calling service] providers; the tariffed service and other fees assessed by ICS providers; the telephone service quality provided by Respondents, including the frequency of dropped calls and line noise; and Respondents’ billing practices.”<sup>1</sup> The DTC specifically excluded from this proceeding issues relating to the usage rate component of the ICS rate-setting mechanism, the frequency and content of recorded warning messages, and

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<sup>1</sup> 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*, Hearing Officer Interlocutory Ruling (Sept. 23, 2013), *aff’d by*, Order on Appeal of Hearing Officer’s Ruling (Feb. 26, 2014) at 1-2 (“*Interlocutory Order*”).

the availability and upkeep of telecommunications equipment at correctional facilities. *Interlocutory Order* at 2. Therefore, any Interrogatory related to the excluded issues or outside the limited scope of this proceeding is improper.

In the *Interlocutory Order*, the DTC acknowledged the “unique additional costs associated with” inmate calling services, which are above and beyond the traditional cost recovery addressed by usage rates. *Interlocutory Order* at 19. A similar acknowledgement in 1998 led the DTC’s predecessor to adopt a per-call surcharge of \$3.00 per call.<sup>2</sup> The DTC explained that “the rate-setting mechanism adopted for ICS in the *1998 Order* is an incentive regulatory scheme. ‘Any definition of reasonable compensation under an incentive regulatory scheme must be broad enough to allow a utility that is achieving above-average efficiencies to earn more than has been defined as a ‘fair return’ under [rate of return] regulation.’ The Department designed the surcharge to allow ICS providers recovery of legitimate additional costs associated with ICS and to encourage ICS providers to improve productivity and reduce costs through advances in technology similar to the benefit a service provider may receive in a competitive marketplace.” *Interlocutory Order* at 23-24 (citation omitted). According to the DTC, “[w]hether an ICS provider treats those extra earnings as profit, or utilizes them to improve its bidding position to provide ICS through offering lower rates or more generous commissions to a correctional facility, is at the discretion of the provider.” *Interlocutory Order* at 24.

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<sup>2</sup> D.P.U./D.T.E. 97-88/97-18 (Phase II), *Investigation by the Department of Telecommunications and Energy on Its Own Motion regarding (1) Implementation of Section 276 of the Telecommunications Act of 1996 relative to Public Interest Payphones, (2) Entry and Exit Barriers for the Payphone Marketplace, (3) New England Telephone and Telegraph Company d/b/a NYNEX’s Public Access Smart-Pay Line Service, and (4) the Rate Policy for Operator Services Providers*, Order on Payphone Barriers to Entry and Exit, and OSP Rate Cap, at 10 (Apr. 17, 1998) (“1998 Order”).

In setting the surcharge, the DTC's predecessor looked to rates charged by companies in 33 states and held that it could "reasonably rely on the costs of these carriers as a proxy for the costs of inmate callings services providers in Massachusetts." *1998 Order* at 10 (finding that using rate caps "provides an administratively efficient way for the Department to ensure that these rates remain reasonable"). The DTC's use of other states as a proxy was an efficient method for the agency to determine the surcharge and was based on an implicit holding that it was unnecessary for ICS providers in Massachusetts to submit detailed ICS cost analyses in order for the DTC to set a reasonable per-call surcharge. *See, e.g., D.P.U. 94-50, NYNEX Price Cap* (May 12, 1995) (finding "one of the primary benefits of price cap regulation is that it renders unnecessary certain regulatory reviews, such as cost allocation and prudence inquiries, that have been fundamental to [rate of return] regulation"); *D.P.U. 93-98, Regulatory Treatment of Telecommunications Common Carriers* (May 11, 1994) ("current market forces, statutory requirements, and the Department's tariff regulations, notice requirements, and consumer complaint resolution process, are sufficient to ensure not only that rates are just and reasonable but that there is adequate consumer protection for interexchange, competitive access, and [alternative operator services], absent the regulation of entry into these markets"); *D.P.U. 94-184, IntraLATA and Local Exchange Competition* (Aug. 29, 1996) (stating that competitors "may file tariff revisions for existing and new service offerings with minimal cost-support documentation"). GTL therefore objects to the Interrogatories to the extent they request information on costs that are covered by the surcharge because the DTC has acknowledged (1) that the surcharge is not directly related to such costs and (2) that ICS providers are not required to itemize their costs in order for the DTC to set a reasonable surcharge.

GTL also objects to all Interrogatories relating to the amount or reasonableness of commissions as the DTC has no jurisdiction over such commissions, which are set by the Massachusetts Department of Corrections, and therefore are outside the scope of this proceeding. *See Breest v. Dubois*, No. 94-1665H, 1997 WL 449898 (Mass. Super. 1997) (holding that the Department of Corrections has the authority to enter into contracts requiring commissions on inmate calls because the DOC is responsible for making and entering into any contracts and agreements necessary for the performance of its duties, which includes maintaining security, safety and order at all state correctional facilities). GTL also objects to all Interrogatories relating to the provision of interstate inmate calling services because such services are not within the jurisdiction of the DTC. *See* G.L. c. 159, § 12; *see also* D.T.E. 03-60, 04-73, Consolidated Order Dismissing Triennial Review Order Investigation and Vacating Suspension of Tariff M.D.T.E. No. 17 (Dec. 15, 2004) (“Under Massachusetts law, the Department has the power of ‘general supervision and regulation of, and jurisdiction and control’ over the ‘transmission of intelligence within the commonwealth by electricity, by means of telephone lines or telegraph lines or any other method or system of communication.’ This jurisdiction extends to services ‘when furnished or rendered for public use within the commonwealth’ by ‘common carriers.’ The Department exercises jurisdiction over such intrastate telecommunications services, *i.e.*, furnished within the commonwealth, to the full extent not preempted by federal law.”).

In short, most of Petitioners’ Interrogatories have little relation to the issues in this proceeding and are just impermissible fishing expeditions. *See, e.g., Alphas Co., Inc. v. Kilduff*, 888 N.E.2d 1003, 1012 (Mass Ct. App. 2008) (affirming summary judgment and noting that “[p]arties may not ‘fish’ for evidence on which to base their complaint in hopes of somehow

finding something helpful to their case in the course of the discovery procedure”) (internal quotation marks omitted).

2. GTL objects to the Interrogatories to the extent they seek to impose a burden beyond that permitted by 220 CMR 1.00, the *Procedural Order* issued on February 27, 2014 in this proceeding (“*Procedural Order*”) or other applicable law or regulation. GTL also objects to Petitioners’ attempt to incorporate Superior Court Standing Order 1-09 in its Definitions and Instructions to the extent it conflicts with, or attempts to expand or modify, the obligations and procedures set forth in 220 CMR 1.00 or the *Procedural Order*.

3. GTL objects to the Interrogatories on the grounds that they are vague, ambiguous, overbroad, unduly burdensome or similarly inappropriate.

4. GTL objects to the definition of “GTL” and “you” and “your” as vague, ambiguous, overbroad and unduly burdensome and specifically objects to the definition to the extent it attempts to include insurers, assigns, successors, executors, firms, trustees, receivers, custodians, contractors, subcontractors and shareholders.

5. GTL objects to the definition of “consumer” as vague, ambiguous, overbroad and unduly burdensome and specifically objects to the definition to the extent it purports to include any individual or entity that does not have a contractual relationship with GTL.

6. GTL objects to the definition of “calendar year” as vague, ambiguous, overbroad and unduly burdensome and when referring to 2014, shall respond as if that term were defined as January 1, 2014 to March 10, 2014.

7. GTL objects to the Interrogatories to the extent they call for confidential information, including, but not limited to, proprietary, trade secret and/or commercially sensitive information.

8. GTL objects to the Interrogatories to the extent the burden or expense of the proposed discovery outweighs its likely benefit, considering the needs of the proceeding, the amount in controversy, the parties' resources, the importance of the issue or issues to which the Interrogatories are directed and the importance of discovery in resolving such issue or issues.

9. GTL objects to the Interrogatories to the extent that they seek information that is not within GTL's possession, custody or control.

10. GTL objects to the Interrogatories on the ground that they seek information that is publicly available.

11. GTL objects to the Interrogatories to the extent that they require that documents be identified or described and reserves the right instead to produce such documents, if any, either in response to an Interrogatory or as kept in the ordinary course of business.

12. GTL objects to the Interrogatories to the extent that they seek documents and information protected from disclosure by the attorney-client privilege, the common interest privilege or joint defense privilege, the attorney work-product doctrine or any other applicable privilege, protection or immunity that makes such information non-discoverable. To the extent that the Interrogatories seek such privileged or protected information, GTL hereby claims such privilege(s) and invokes such protection(s). Any documents or information disclosed in response to the Interrogatories shall be disclosed without waiving, but on the contrary, preserving and intending to preserve, each of these privileges and protections. Any inadvertent disclosure of privileged or protected information or documents shall not be deemed a waiver of the applicable privilege(s) or protection(s), and any such document and all copies and images thereof shall be returned to GTL upon demand and/or upon discovery of the inadvertent production.



13. In responding to these Interrogatories, GTL does not waive or intend to waive but rather intends to preserve and is preserving:

- a. All objections as to the relevancy, materiality, admissibility, vagueness, ambiguity, or other infirmity in the form of the Interrogatories and any objections based on the undue burden imposed by any of the Interrogatories;
- b. All rights to object on any ground to the use of the answers, or their subject matter, in this proceeding or any other action;
- c. All rights to object on any ground to any further Interrogatories or other discovery requests involving or related to the subject matter of the Interrogatories; and;
- d. Any and all privileges and rights under any applicable law.

14. These responses are based upon information now known to GTL. GTL reserves the right to amend and/or supplement these Responses and Objections at any time.

15. Nothing in these responses shall be construed as constituting or implying an admission of any allegation or agreement with any assertion or characterization in the Interrogatories.

16. In addition to the general objections set forth above, GTL will also state specific objections to the Interrogatories where appropriate, including objections that are not generally applicable to each of the Interrogatories. By setting forth such specific objections, GTL does not intend to limit or restrict the General Objections set forth above. To the extent that GTL responds to specific Interrogatories, GTL is not waiving its stated objections by providing

information. GTL's General Objections are incorporated in full into the specific responses set forth below.

**OFFER TO CONFER**

Counsel for GTL offers to confer in good faith with counsel for Petitioners regarding the responses to Petitioners' Interrogatories.

**SPECIFIC OBJECTIONS AND RESPONSES****INTERROGATORY No. 1:****Rates, Receipts and Commissions**

Please identify all contracts for inmate calling service (hereinafter ICS) calls in Massachusetts to which you have been a party since January 2011, naming the government authority with whom you contracted and including any modifications or amendments. For each calendar year of each contract, please provide the following information. You are not restricted to using this identical format as long as you can provide all of the requested responses.

	<b><u>Fixed Rate</u></b>	<b><u>Surcharge</u></b>	<b><u>Rate Per Minute</u></b>	<b><u>Site Commission Percentage</u></b>
<b><u>Collect Calling</u></b>				
Local Calling				
State IntraLATA Calling				
State InterLATA Calling				
Interstate				
<b><u>Debit Calling</u></b>				
Local Calling				
State IntraLATA Calling				
State InterLATA Calling				
<b><u>Advance payment calling</u></b>				
Local Calling				
State IntraLATA Calling				
State InterLATA Calling				
<b><u>Total</u></b>				

**GTL Response to Interrogatory No. 1:**

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory is overly broad and unduly burdensome, and is not reasonably calculated to lead to the discovery of admissible evidence. GTL further objects to this Interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding. Questions regarding fixed rates, rates per minute, and site commission percentages are beyond

the scope of this proceeding as they do not relate to “the per-call surcharge assessed by ICS providers” or any of the other three areas of inquiry identified in the *Interlocutory Order*. The \$3.00 cap on the per-call surcharge does not vary based on the type of intrastate call (local, intrastate intraLATA, intrastate interLATA) or the length of the call. In addition, questions concerning interstate inmate calling services are beyond the scope of this proceeding. Without waiving its General Objections or its Specific Objections to this Interrogatory, GTL responds as follows:

Since January 2011, GTL has been a party to contracts with the following government authorities to provide inmate calling service in Massachusetts:

- Massachusetts Department of Corrections
- Norfolk County Sheriff’s Office
- Plymouth County Sheriff’s Office (inmate calling service initiated in August 2011)
- Hampden County Sheriff’s Office (inmate calling service initiated in October 2012)

Information regarding surcharges (as defined by Petitioners, the term “surcharge” refers to a flat fee assessed for connecting to the network, prior to being charged on a per minute basis) are found in GTL’s tariffs on file with the DTC (Global Tel\*Link Corporation M.D.T.E. Tariff No. 2 and DSI-ITI, LLC Massachusetts Tariff No. 1).

**Person who will support GTL Response to Interrogatory No. 1:**

John Canny, Account Manager, Global Tel\*Link Corporation

**INTERROGATORY No. 2:**

For each year of each contract identified in response to Interrogatory Number 1, above, (hereinafter No. 1) please provide the following information. You are not restricted to using this identical format as long as you can provide all of the requested responses.

**Gross  
Receipts**

**Commissions  
Paid**

**Collect Calling**

Local Calling  
State IntraLATA Calling  
State InterLATA Calling  
Interstate

**Debit Calling**

Local Calling  
State IntraLATA Calling  
State InterLATA Calling

**Advance payment calling**

Local Calling  
State IntraLATA Calling  
State InterLATA Calling

**Total****GTL Response to Interrogatory No. 2:**

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory is overly broad and unduly burdensome, seeks confidential information, and is not reasonably calculated to lead to the discovery of admissible evidence. GTL further objects to this Interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding. Questions relating to gross receipts and commissions paid are beyond the scope of this proceeding as they do not relate to “the per-call surcharge assessed by ICS providers” or any of the other three areas of inquiry identified in the *Interlocutory Order*. The \$3.00 cap on the per-call surcharge does not vary based on the type of intrastate call (local,

intrastate intraLATA, intrastate interLATA) being made by the inmate. In addition, questions concerning interstate inmate calling services are beyond the scope of this proceeding.

**INTERROGATORY No. 3:**

For each year of each contract identified in response to No. 1, please provide the following information. You are not restricted to using this identical format as long as you can provide all of the requested responses.

	<b><u>No. of Calls Competed</u></b>	<b><u>Average Call Length</u></b>	<b><u>Total No. of Minutes Used</u></b>
<b><u>Collect Calling</u></b>			
Local Calling			
State IntraLATA Calling			
State InterLATA Calling			
Interstate			
<b><u>Debit Calling</u></b>			
Local Calling			
State IntraLATA Calling			
State InterLATA Calling			
<b><u>Advance payment calling</u></b>			
Local Calling			
State IntraLATA Calling			
State InterLATA Calling			
<b><u>Total</u></b>			

**GTL Response to Interrogatory No. 3**

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory is overly broad and unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. GTL further objects to this Interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding. Questions regarding average call length and the total number of minutes used are beyond the scope of this proceeding as they do not relate to “the per-call surcharge assessed by ICS providers” or any of the other three areas of inquiry identified in the *Interlocutory Order*. The \$3.00 cap on the per-call surcharge does not vary based on the type of intrastate call (local,

intrastate intraLATA, intrastate interLATA), the number of calls, the length of the call, or the total number of minutes used. In addition, questions concerning interstate inmate calling services are beyond the scope of this proceeding. Without waiving its General Objections or its Specific Objections to this Interrogatory, GTL responds as follows:

GTL provides its yearly total number of intrastate Massachusetts inmate telephone calls completed from 2011 (or from the initiation of service under a particular contract as set forth in GTL Response to Interrogatory No. 1) to March 2014 for each of the contracts listed in GTL Response to Interrogatory No. 1:

Massachusetts Department of Corrections

2011 \*\*\*START CONFIDENTIAL\*\*\* [REDACTED] \*\*\*END CONFIDENTIAL\*\*

2012 \*\*\*START CONFIDENTIAL\*\*\* [REDACTED] \*\*\*END CONFIDENTIAL\*\*

2013 \*\*\*START CONFIDENTIAL\*\*\* [REDACTED] \*\*\*END CONFIDENTIAL\*\*

January-March 2014 \*\*\*START CONFIDENTIAL\*\*\* [REDACTED] \*\*\*END  
CONFIDENTIAL\*\*\*

Norfolk County Sheriff's Office

2011 \*\*\*START CONFIDENTIAL\*\*\* [REDACTED] \*\*\*END CONFIDENTIAL\*\*\*

2012 \*\*\*START CONFIDENTIAL\*\*\* [REDACTED] \*\*\*END CONFIDENTIAL\*\*\*

2013 \*\*\*START CONFIDENTIAL\*\*\* [REDACTED] \*\*\*END CONFIDENTIAL\*\*\*

January-March 2014 \*\*\*START CONFIDENTIAL\*\*\* [REDACTED] \*\*\*END  
CONFIDENTIAL\*\*\*

Plymouth County Sheriff's Office

August-December 2011 \*\*\*START CONFIDENTIAL\*\*\* [REDACTED] \*\*\*END  
CONFIDENTIAL\*\*\*

2012 \*\*\*START CONFIDENTIAL\*\*\* [REDACTED] \*\*\*END CONFIDENTIAL\*\*\*

2013 \*\*\*START CONFIDENTIAL\*\*\* [REDACTED] \*\*\*END CONFIDENTIAL\*\*\*

January-March 2014 \*\*\*START CONFIDENTIAL\*\*\* [REDACTED] \*\*\*END  
CONFIDENTIAL\*\*\*



Hampden County Sheriff's Office

October-December 2012 \*\*\*START CONFIDENTIAL\*\*\* [REDACTED] \*\*\*END  
CONFIDENTIAL\*\*\*

2013 \*\*\*START CONFIDENTIAL\*\*\* [REDACTED] \*\*\*END CONFIDENTIAL\*\*\*

January-March 2014 \*\*\*START CONFIDENTIAL\*\*\* [REDACTED] \*\*\*END  
CONFIDENTIAL\*\*\*

**Person who will support GTL Response to Interrogatory No. 3:**  
Steven Yow, Chief Financial Officer, Global Tel\*Link Corporation

**INTERROGATORY No. 4:**

For each year of each contract identified in response to No. 1, please list any minimum commission guaranteed by the contract and state the amount paid, if any, to satisfy this guarantee.

**GTL Response to Interrogatory No. 4**

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory is overly broad and unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. GTL further objects to this Interrogatory on the grounds that this Interrogatory seeks information that is not relevant to the subject matter of this proceeding. Questions concerning minimum commissions guaranteed and commissions paid are beyond the scope of this proceeding as they do not relate to “the per-call surcharge assessed by ICS providers” or any of the other three areas of inquiry identified in the *Interlocutory Order*.

**INTERROGATORY No. 5:**

Please identify any documents demonstrating revenue that you received and commission payments made under each of the contracts identified in response to No. 1.

**GTL Response to Interrogatory No. 5**

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, #7, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory is duplicative, overly broad and unduly burdensome, seeks confidential information, and is not reasonably calculated to lead to the discovery of admissible evidence. GTL further objects to this Interrogatory on the grounds that this Interrogatory seeks information that is not relevant to the subject matter of this proceeding. Questions concerning revenue received by GTL and commission payments made by GTL are beyond the scope of this proceeding as they do not relate to “the per-call surcharge assessed by ICS providers” or any of the other three areas of inquiry identified in the *Interlocutory Order*.

**INTERROGATORY No. 6:**

Please list all categories of costs associated with providing ICS in Massachusetts, including but not limited to the following potential costs. For each cost, please indicate how much you spent during each calendar year of each contract identified in No. 1. To the extent that you allocate shared costs between facilities, or between Massachusetts and other jurisdictions, please so indicate and state the basis for your calculation of pro-rated costs.

- a) Call processing systems
- b) Automated operators
- c) Live operators
- d) Call recording and monitoring equipment
- e) Fraud control programs
- f) Financial processing
- g) Lobbying and other government advocacy
- h) Back office administrative costs
- i) Call centers
- j) Database checks
- k) Voice overlays
- l) Customized call detail reports
- m) Research and Development
- n) Call control systems
- o) Other personnel costs
- p) Other costs not referenced in a. through o.

**GTL Response to Interrogatory No. 6**

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, #7, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory is vague, ambiguous, overly broad and unduly burdensome, seeks confidential information, and is not reasonably calculated to lead to the discovery of admissible evidence. GTL further objects to this Interrogatory on the grounds that this Interrogatory seeks information that is not relevant to the subject matter of this proceeding. Questions regarding “all” categories of costs associated with providing inmate calling service in Massachusetts are beyond the scope of this proceeding as they do not relate to “the per-call surcharge assessed by ICS providers” or any of the other three areas of inquiry identified in the *Interlocutory Order*.

Without waiving its General Objections or its Specific Objections to this Interrogatory, GTL responds as follows:

In addition to the categories listed in a-o above, GTL also considers the following to be additional, unique characteristics associated with providing inmate calling services: (1) bad debt expense for collect calling; (2) credit card and transaction processing fees; (3) special equipment, including service maintenance and repair of inmate phones; (4) capital expenditures; (5) commissions required to be paid under state law or correctional facility contracts; (6) data storage; (7) on-site personnel and human resources support; (8) software, including web-portals for use by correctional facilities and web-based payment systems for friends and family; (9) voice analysis or biometrics; (10) cell phone detection tools; (11) maintenance of prepaid accounts and inmate PIN numbers; and (12) management and movement of inmate trust funds held by a commissary (or other third-party that manages inmate trust funds).

**Person who will support GTL Response to Interrogatory No. 6:**

Steven Yow, Chief Financial Officer, Global Tel\*Link Corporation

Michael Browning, Vice President of Accounting, Global Tel\*Link Corporation

**INTERROGATORY No. 7:**

For each type of call described in No.1 (Collect, Debit and Advance Pay Calling), please provide an itemization of your expenses associated with the cost to complete such a call. To the extent that it is not possible to itemize your expenses, please describe in detail each component of the aggregate costs to you of completing such calls.

**GTL Response to Interrogatory No. 7**

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, #7, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory is duplicative, overly broad and unduly burdensome, seeks confidential information, and is not reasonably calculated to lead to the discovery of admissible evidence. GTL further objects to this Interrogatory on the grounds that this Interrogatory seeks information that is not relevant to the subject matter of this proceeding. Questions regarding itemization of expenses associated with the cost to complete calls and each component of the aggregate costs of completing calls are beyond the scope of this proceeding as they do not relate to “the per-call surcharge assessed by ICS providers” or any of the other three areas of inquiry identified in the *Interlocutory Order*. Without waiving its General Objections or its Specific Objections to this Interrogatory, GTL responds as follows:

GTL does not itemize its expenses associated with the cost to complete a call. GTL looks at the total cost of providing inmate calling services as a whole to a correctional facility customer, which is based on the specific requirements of each individual Request for Proposal (“RFP”) or correctional facility contract and any applicable rate requirements under state and federal law.

**Person who will support GTL Response to Interrogatory No. 7:**

Steven Yow, Chief Financial Officer, Global Tel\*Link Corporation

Michael Browning, Vice President of Accounting, Global Tel\*Link Corporation

**INTERROGATORY No. 8:**

Please describe what equipment is used to store, record and monitor inmate telephone calls in each of the Massachusetts correctional facilities listed in response to No. 1.

**GTL Response to Interrogatory No. 8**

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, #7, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory is overly broad and unduly burdensome, seeks information that is confidential, is in the purview of the Massachusetts Department of Corrections, and is not reasonably calculated to lead to the discovery of admissible evidence. GTL further objects to this Interrogatory on the grounds that this Interrogatory seeks information that is not relevant to the subject matter of this proceeding. Questions regarding the equipment used by GTL to store, record and monitor inmate telephone calls are beyond the scope of this proceeding as they do not relate to “the per-call surcharge assessed by ICS providers” or any of the other three areas of inquiry identified in the *Interlocutory Order*.

**INTERROGATORY No. 9:**

If you currently use live operators in the provision of inmate calling services in Massachusetts, how many and in what capacity are they used at each facility for which you provide ICS?

**GTL Response to Interrogatory No. 9**

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory is not reasonably calculated to lead to the discovery of admissible evidence and this Interrogatory seeks information that is not relevant to the subject matter of this proceeding. Questions concerning the number of live operators GTL uses and the capacity in which live operators are used are beyond the scope of this proceeding as they do not relate to “the per-call surcharge assessed by ICS providers” or any of the other three areas of inquiry identified in the *Interlocutory Order*. Without waiving its General Objections or its Specific Objections to this Interrogatory, GTL responds as follows:

“Operator” calls include automated, prepaid services like those offered to inmates and their friends and families by GTL and not solely those services with live operators. The federal definition of “inmate operator services” specifically includes “any automatic or live assistance to a consumer to arrange for billing or completion, or both” of a telephone call. 47 C.F.R. § 64.710(b)(3). Live operators are not used in the origination of calls by inmates, and generally are not permitted to be used under state law or correctional facility requirements. For example, the Massachusetts Department of Corrections Rules on Telephone Access and Use state that all inmate telephone calls must be made “utilizing an automated operator” (103 CMR 482.06(3)(a)). Live operators, however, are available as necessary for friends and family of an inmate.

**Person who will support GTL Response to Interrogatory No. 9:**

Lauren Studebaker, Senior Vice President, Services, Global Tel\*Link Corporation



**INTERROGATORY No. 10:**

With respect to each year, each contract and each type of call (collect, debit and advanced payment) identified in No. 1,

- q) what dollar amount of receivables were not collectable?
- r) what dollar amount of lost revenue did this amount to?

**GTL Response to Interrogatory No. 10**

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, #7, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory is vague, ambiguous, overly broad and unduly burdensome, seeks confidential information, seeks information that is not relevant to the subject matter of this proceeding, and is not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY No. 11:**

For each contract identified in No. 1, please describe:

- a) The number of pre-paid or “debit” accounts for each year from January 2011 to present;
- b) the process used to deposit funds into a pre-paid account. If the process used is different depending on the source of the funds (cash, credit card, western union, check) please explain the process for each separately;
- c) the costs attributable to processing deposits to pre-paid accounts;
- d) the costs attributable to processing refunds from pre-paid accounts;
- e) the dollar mount [sic] that was actually refunded to Massachusetts consumers for each calendar year from January 2011 to the present.

**GTL Response to Interrogatory No. 11**

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, #7, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory is vague, ambiguous, overly broad and unduly burdensome, seeks confidential information, and is not reasonably calculated to lead to the discovery of admissible evidence. GTL further objects to this Interrogatory because it seeks information that is not relevant to the subject matter of this proceeding. Questions regarding the number of prepaid or debit accounts, refunds and deposits are beyond the scope of this proceeding as they do not relate to “the per-call surcharge assessed by ICS providers” or any of the other three areas of inquiry identified in the *Interlocutory Order*. GTL further objects to this Interrogatory because the process used to deposit funds into a prepaid account is publicly available in GTL’s Massachusetts tariffs (Global Tel\*Link Corporation M.D.T.E. Tariff No. 2 and DSI-ITI, LLC Massachusetts Tariff No. 1), on GTL’s website, in the GTL procedures and information booklets posted on the Massachusetts Department of Corrections website, via the links and information found in Massachusetts Department of Corrections Friends and Family Handbook, on the Plymouth County Sheriff’s Department and Correctional Facility website, and on the Norfolk County Sheriff’s Office website.

**INTERROGATORY No. 12:**

Please describe the process used to refund unused funds from pre-paid accounts to consumers. If the refunds are unclaimed or otherwise not processed, please describe how these funds are accounted for (e.g. retained as income, transferred to the State's unclaimed funds program) and whether or not commissions are paid on income generated from the unclaimed funds.

**GTL Response to Interrogatory No. 12**

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, #7, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory seeks information that is confidential, that is not reasonably calculated to lead to the discovery of admissible evidence, and that is not relevant to the subject matter of this proceeding. Questions regarding the process used to refund unused funds are beyond the scope of this proceeding as they do not relate to "the per-call surcharge assessed by ICS providers" or any of the other three areas of inquiry identified in the *Interlocutory Order*. GTL further objects to this Interrogatory because information regarding the process used to refund unused funds from prepaid accounts is publicly available in GTL's Massachusetts tariffs (Global Tel\*Link Corporation M.D.T.E. Tariff No. 2 and DSI-ITI, LLC Massachusetts Tariff No. 1), on GTL's website, in the GTL procedures and information booklets posted on the Massachusetts Department of Corrections website, via the links and information found in Massachusetts Department of Corrections Friends and Family Handbook, on the Plymouth County Sheriff's Department and Correctional Facility website, and on the Norfolk County Sheriff's Office website.

**INTERROGATORY No. 13:**

For each contract identified in No. 1, please identify and describe any and all fees charged by your company to consumers of inmate calling services in Massachusetts for establishing, using, maintaining or closing a pre-paid account, including but not limited to fees for opening an account; depositing funds to an account by cash, check, western union, moneygram, or credit card; obtaining a refund from an account; and maintaining an inactive account, stating the percentage or amount any site commission paid from these fees.

**GTL Response to Interrogatory No. 13**

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory seeks information that is not relevant to the subject matter of this proceeding, is not reasonably calculated to lead to the discovery of admissible evidence, and seeks information that is publicly available in GTL's Massachusetts tariffs (Global Tel\*Link Corporation M.D.T.E. Tariff No. 2 and DSI-ITI, LLC Massachusetts Tariff No. 1), on GTL's website, in the GTL procedures and information booklets posted on the Massachusetts Department of Corrections website, via the links and information found in Massachusetts Department of Corrections Friends and Family Handbook, on the Plymouth County Sheriff's Department and Correctional Facility website, and on the Norfolk County Sheriff's Office website.

**INTERROGATORY No. 14:**

Please identify and describe all taxes and regulatory and other surcharges charged by your company to consumers of inmate calling services in Massachusetts.

**GTL Response to Interrogatory No. 14**

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory is overly broad and unduly burdensome, seeks information that is not relevant to the subject matter of this proceeding, seeks information that is publicly available in GTL's Massachusetts tariffs (Global Tel\*Link Corporation M.D.T.E. Tariff No. 2 and DSI-ITI, LLC Massachusetts Tariff No. 1), and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its General Objections or its Specific Objections to this Interrogatory, GTL responds as follows:

GTL uses industry leading third-party tax engines that are integrated with GTL's billing system to provide real-time calculations of telecommunications taxes. The tax engines consider the origination, destination, and billing telephone numbers for a particular call to determine the appropriate taxes to charge for that call. Given that calls originating from Massachusetts correctional facilities can be placed to anywhere in the United States, the resulting tax obligation could be due to any variety of combinations of state, county, and city tax jurisdictions. The use of these tax engines with access to the thousands of potential tax rates nationwide is critical to accurate tax calculations and customer bills. The third-party tax engine databases are updated on a monthly basis to reflect any changes to Federal, state and, local tax rates.

**Person who will support GTL Response to Interrogatory No. 14:**

Steven Yow, Chief Financial Officer, Global Tel\*Link Corporation

Michael Browning, Vice President of Accounting, Global Tel\*Link Corporation

**INTERROGATORY No. 15:**

Please describe the process used for receiving, processing and closing a complaint regarding the provision of inmate calling services for each facility currently under contract with you in Massachusetts.

**GTL Response to Interrogatory No. 15**

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory is overly broad and unduly burdensome, is not reasonably calculated to lead to the discovery of admissible evidence, and seeks information that is not relevant to the subject matter of this proceeding. Any questions not limited to service quality and billing practices are beyond the scope of this proceeding as they do not relate to the four areas of inquiry identified in the *Interlocutory Order*. Without waiving its General Objections or its Specific Objections to this Interrogatory, GTL responds as follows:

GTL takes complaints regarding the quality of its inmate calling services very seriously. GTL's Massachusetts tariff, for example, states that any disputed charges "should be received orally or in writing by [GTL] as soon as possible" so that GTL can "promptly investigate and advise the Customer as to its findings concerning disputed charges." Global Tel\*Link Corporation, M.D.T.E. Tariff No. 2, § 2.10.2 (effective Apr. 30, 2005). GTL's tariff further indicates that adjustments will be made if "circumstances exist which reasonably indicate that such changes are appropriate." *Id.*

Individuals using GTL's services have numerous ways to contact GTL. GTL's contact information for its billing and customer service departments is included on customer bills for those customers placing collect call charges on their local exchange carrier bill, and is also available on GTL's website. To ensure inmates have access to information regarding GTL's services, GTL makes posters available in corrections facilities, which can be hung in each

individual inmate calling location. The poster provides detail on the applicable call rates, instructions on how to place a call, and contact information for lodging complaints and inquiries. GTL also employs an on-site administrator that can provide inquiring inmates with additional information to resolve complaints regarding the inmate calling system.

When issues regarding the service quality of an inmate call are brought to GTL's attention (either from the correctional facility, the prisoner, or the prisoner's family or friends), GTL reviews the call detail record and/or the recording of the telephone call at issue. Based on that investigation, GTL determines whether a credit or refund is warranted for that particular call or whether there is a larger service issue to be remedied. Non-specific claims such as "connection problems" and "customer service problem," however, do not provide adequate information that would allow GTL to address a specific service quality issue with a particular telephone call. GTL encourages informal attempts to resolve complaints at the company-level in the first instance.

When customers request to be transferred to a higher level due to not being able to get their issue resolved by a customer service agent, GTL has a dedicated staff of experienced "escalation" agents who can assist the customer. If, in the rare instance, an escalation agent is not able to completely satisfy the customer's concern, they will elevate the issue to a call center supervisor for resolution. Customer service and escalation agents, along with call center supervisors, notate all customer contact detail in GTL's "CARES" customer service application. The CARES system contains a customer's call history, including transaction history, invoice history, and account notations outlining and detailing all GTL interaction with that customer. The information is maintained on a per account or billing telephone number basis.

Although GTL's customer service agents have powerful research tools available to them to resolve concerns, when they encounter an issue that requires further research, they submit electronic research forms with all the details of the issues to an experienced resolution team who performs the additional verification needed to solve the issue. If there is an issue that requires technical assistance, this team creates internal "action" to the technical group(s) that can provide the proper support.

Complaints filed at the Federal Communications Commission ("FCC"), state public utility commission ("PUC"), or Better Business Bureau ("BBB"), and other formal complaints are handled by a dedicated billing escalations group and are tracked by GTL's "MRit" system. This system tracks complaints by reference number, type of complaint (FCC, PUC, consumer, etc.), category, and correctional facility. The system affords GTL the ability to summarize the complaint and provide specific details concerning its nature. The MRit system makes it possible to filter complaints by agency, internal group, specific categories, and facility, so that reporting can be as general or specific as needed.

**Person who will support GTL Response to Interrogatory No. 15:**

Vance Macdonald, Executive Director of Customer Service, Global Tel\*Link Corporation



**INTERROGATORY No. 16:**

For each year of each contract identified in No. 1, please state the number of complaints in each of the following categories. If it is not possible to break down complaints by category, please so state and give the most detailed breakdown that your records permit.

- a) Static, line noise and other problems with audibility
- b) Dropped calls
- c) Broken telephone sets
- d) Billing concerns, including but not limited to charges for dropped calls, problems with refunds, and contested fees and surcharges.

**GTL Response to Interrogatory No. 16**

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, #7, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory seeks information that is not relevant to the subject matter of this proceeding. Questions regarding broken telephone sets are beyond the scope of this proceeding as “the availability and upkeep of telecommunications equipment at correctional facilities” specifically was excluded from inquiry by the *Interlocutory Order*. Without waiving its General Objections or its Specific Objections to this Interrogatory, GTL responds as follows:

From January 2011 (or from the initiation of service under a particular contract as set forth in GTL Response to Interrogatory No. 1) to March 2014, GTL has received the following complaints regarding billing issues and dropped calls, each of which was resolved in the normal course by either refunding the customer, assisting with the establishment of an account, or otherwise addressing the customer’s specific concern:

Massachusetts Department of Corrections

Billing complaints - \*\*\*START CONFIDENTIAL\*\*\* ■ \*\*\*END CONFIDENTIAL\*\*\*

Dropped call complaints - \*\*\*START CONFIDENTIAL\*\*\* ■ \*\*\*END  
CONFIDENTIAL\*\*\*

Hamden County Sheriff’s Office

Billing complaints - \*\*\*START CONFIDENTIAL\*\*\* ■ \*\*\*END CONFIDENTIAL\*\*\*

Dropped call complaints - \*\*\*START CONFIDENTIAL\*\*\* ■ \*\*\*END  
CONFIDENTIAL\*\*\*

Norfolk County Sheriff's Office

Billing complaints - \*\*\*START CONFIDENTIAL\*\*\* ■ \*\*\*END CONFIDENTIAL\*\*

Dropped call complaints - \*\*\*START CONFIDENTIAL\*\*\* ■ \*\*\*END CONFIDENTIAL\*\*

Plymouth County Sheriff's Office

Billing complaints - \*\*\*START CONFIDENTIAL\*\*\* ■ \*\*\*END CONFIDENTIAL\*\*

Dropped call complaints - \*\*\*START CONFIDENTIAL\*\*\* ■ \*\*\*END CONFIDENTIAL\*\*

**Person who will support GTL Response to Interrogatory No. 16:**

Vance Macdonald, Executive Director of Customer Service, Global Tel\*Link Corporation

**INTERROGATORY No. 17:**

For each complaint received and listed in Interrogatory 16, please describe any action, if any, you took to address the complaint and how and if the complaint was resolved.

**GTL Response to Interrogatory No. 17**

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, #7, and #8. Without waiving its General Objections or its Specific Objections to this Interrogatory, GTL responds by referring to GTL Response to Interrogatory No. 15 and GTL Response to Interrogatory No. 16.

**Person who will support GTL Response to Interrogatory No. 17:**

Vance Macdonald, Executive Director of Customer Service, Global Tel\*Link Corporation

**INTERROGATORY No. 18:**

Please describe any upgrades you made to the telephone systems in any of the facilities listed in No. 1 since 2011.

**GTL Response to Interrogatory No. 18**

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, #7, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory is overly broad and unduly burdensome, and is not reasonably calculated to lead to the discovery of admissible evidence. GTL further objects to this Interrogatory on the grounds that this Interrogatory seeks information that is not relevant to the subject matter of this proceeding. Questions regarding upgrades to telephone systems are beyond the scope of this proceeding as “the availability and upkeep of telecommunications equipment at correctional facilities” specifically was excluded from inquiry by the *Interlocutory Order*.

**INTERROGATORY No. 19:**

Please describe systems that you use to track or manage complaints about billing issues and identify any documents describing these systems.

**GTL Response to Interrogatory No. 19**

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, #7, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory is vague, ambiguous, overly broad and unduly burdensome, and duplicative of Interrogatory No. 15. Without waiving its General Objections or its Specific Objections to this Interrogatory, GTL responds by referring to GTL Response to Interrogatory No. 15 and GTL Response to Interrogatory No. 16.

**Person who will support GTL Response to Interrogatory No. 19:**

Vance Macdonald, Executive Director of Customer Service, Global Tel\*Link Corporation

**INTERROGATORY No. 20:**

Please describe systems or processes that you use to track performance by facility, state and by region, in the following categories, and identify any documents describing these systems.

- a) financial and / or margin performance (i.e. the revenue, expenses and margin you received);
- b) quality performance (i.e. how you did on completing calls);
- c) technical and network performance (i.e. how the network, equipment and software performed).

**GTL Response to Interrogatory No. 20**

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, #7, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory is vague, ambiguous, overly broad and unduly burdensome, is duplicative, and is not reasonably calculated to lead to the discovery of admissible evidence. GTL further objects to this Interrogatory on the grounds that this Interrogatory seeks information that is confidential and is not relevant to the subject matter of this proceeding. Questions regarding financial and/or margin performance are beyond the scope of this proceeding as they do not relate to “the per-call surcharge assessed by ICS providers” or any of the other three areas of inquiry identified in the *Interlocutory Order*. Questions regarding technical and network performance are beyond the scope of this proceeding as “the availability and upkeep of telecommunications equipment at correctional facilities” specifically was excluded from inquiry by the *Interlocutory Order*. Without waiving its General Objections or its Specific Objections to this Interrogatory, GTL responds as follows:

With respect to quality performance, please see GTL Response to Interrogatory No. 16. In 2013, GTL completed approximately **\*\*\*START CONFIDENTIAL\*\*\*** [REDACTED] **\*\*\*END CONFIDENTIAL\*\*\*** calls nationwide. Using 2013 as a guideline, GTL’s nationwide complaint to completed call ratio was **\*\*\*START CONFIDENTIAL\*\*\***

**\*\*\*END CONFIDENTIAL\*\*\***, which provides proper context for GTL's quality of service performance.

**Person who will support GTL Response to Interrogatory No. 20:**

Vance Macdonald, Executive Director of Customer Service, Global Tel\*Link Corporation

**INTERROGATORY No. 21:**

Describe your budgetary process including how you set financial goals for the year, and how you compare actual results to what was budgeted.

**GTL Response to Interrogatory No. 21**

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, #7, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory is vague, ambiguous, overly broad and unduly burdensome, and is not reasonably calculated to lead to the discovery of admissible evidence. GTL further objects to this Interrogatory on the grounds that this Interrogatory seeks information that is confidential and is not relevant to the subject matter of this proceeding. Questions regarding GTL's budgetary process including how GTL sets financial goals for the year and how GTL compares actual results to what was budgeted are beyond the scope of this proceeding as they do not relate to the four areas of inquiry identified in the *Interlocutory Order*.



**INTERROGATORY No. 22:**

Please identify and describe any reports, analysis or other documentation that is created to report profitability to management.

**GTL Response to Interrogatory No. 22**

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, #7, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory is vague, ambiguous, overly broad and unduly burdensome, and is not reasonably calculated to lead to the discovery of admissible evidence. GTL further objects to this Interrogatory on the grounds that this Interrogatory seeks information that is confidential and is not relevant to the subject matter of this proceeding. Questions regarding reports, analysis or other documentation that is created to report profitability to management are beyond the scope of this proceeding as they do not relate to the four areas of inquiry identified in the *Interlocutory Order*.

**INTERROGATORY No. 23:**

Please list any and all enforcement actions or investigations against GTL by other public utility commissions from 2009 to the present.

**GTL Response to Interrogatory No. 23**

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory is overly broad and unduly burdensome, and is not reasonably calculated to lead to the discovery of admissible evidence. GTL further objects to this Interrogatory on the grounds that this Interrogatory seeks information that is not relevant to the subject matter of this proceeding. Questions regarding enforcement actions or investigations against GTL are beyond the scope of this proceeding as they do not relate to the four areas of inquiry identified in the *Interlocutory Order*.

**INTERROGATORY No. 24:**

Please state both your gross and net earnings derived from the provision of inmate calling services to the facilities in Massachusetts listed in Response to No. 1 from 2008 to the present, including a comparison of your gross and net earnings derived from your provision of inmate calling services in other states.

**GTL Response to Interrogatory No. 24**

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, #7, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory is vague, ambiguous, overly broad and unduly burdensome, seeks confidential information, and is not reasonably calculated to lead to the discovery of admissible evidence. GTL further objects to this Interrogatory on the grounds that this Interrogatory seeks information that is not relevant to the subject matter of this proceeding. Questions GTL's gross and net earnings derived from the provision of inmate calling services to the facilities in Massachusetts, including a comparison of GTL's gross and net earnings derived from the provision of inmate calling services in other states, are beyond the scope of this proceeding as they do not relate to the four areas of inquiry identified in the *Interlocutory Order*.

**INTERROGATORY No. 25:**

Please state how many telephones for incarcerated ICS consumers are currently installed in each Massachusetts facility to which you provide services and how many service calls you made to each facility for each calendar year from 2011 to the present. If any telephone units were replaced in any of the facilities, please state how many, when they were replaced and why.

**GTL Response to Interrogatory No. 25**

GTL repeats and restates the General Objections to this Interrogatory, and specifically General Objections #1, #3, and #8. GTL further objects to this Interrogatory on the grounds that this Interrogatory is overly broad and unduly burdensome, and is not reasonably calculated to lead to the discovery of admissible evidence. GTL further objects to this Interrogatory on the grounds that this Interrogatory seeks information that is not relevant to the subject matter of this proceeding. Questions regarding telephone installations, service calls, and replacement of telephone units are beyond the scope of this proceeding as “the availability and upkeep of telecommunications equipment at correctional facilities” specifically was excluded from inquiry by the *Interlocutory Order*.

## **CERTIFICATE OF SERVICE**

I, Angela F. Collins, certify on this 29th day of April, 2014, that I (1) provided the **CONFIDENTIAL VERSION** of Global Tel\*Link Corporation's Responses and Objections to

Petitioners' First Set of Interrogatories to the following via Federal Express:

Kalun Lee  
Hearing Officer  
Department of Telecommunications and Cable  
1000 Washington Street, 8th Floor, Suite 820  
Boston MA 02118-6500

and (2) served a copy of the **PUBLIC VERSION** of Global Tel\*Link Corporation's Responses and Objections to Petitioners' First Set of Interrogatories on the following via the method indicated:

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Department of Telecommunications and Cable  
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Boston MA 02118-6500  
Email: catrice.williams@state.ma.us  
Email: dtcefiling@massmail.state.ma.us  
***Via Federal Express and Electronic Mail***

Kalun Lee  
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Department of Telecommunications and Cable  
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Email: kalun.lee@state.ma.us  
***Via Federal Express and Electronic Mail***

Paul Abbott  
General Counsel  
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***Via Electronic Mail and U.S. Mail***

Karlen Reed  
Director, Competition Division  
Department of Telecommunications and Cable  
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**CERTIFICATE OF SERVICE**

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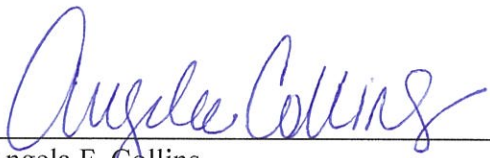
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**CERTIFICATE OF SERVICE**

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Angela F. Collins