



June 6, 2014

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

Via Overnight and Electronic

**RE: D.T.C. 11-16, Petition of Recipients of Collect Calls from Prisoners at  
Correctional Institutions in Massachusetts**

Dear Secretary Williams:

Inmate Calling Solutions, LLC hereby respectfully submits its Opposition to Petitioner's Motion for Extension of Time to File a Motion to Compel ICSolutions' Responses. Three (3) copies of this submission are enclosed for the hearing officer and a copy has been submitted to each Department staff and party representative on the service list.

Please contact me directly with any questions or concerns.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Ken Dawson".

Ken Dawson,  
Director Contracts & Regulatory  
Inmate Calling Solutions, LLC  
210-581-8104

Enclosure

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

**In the matter of: 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**

**OPPOSITION OF INMATE CALLING SOLUTIONS, LLC TO PETITIONER'S  
MOTION FOR EXTENSION OF TIME TO FILE MOTION TO COMPEL  
ICSOLUTIONS RESPONSES**

Petitioners, by their counsel, filed the above captioned "Motion" with the Department of Telecommunications and Cable (the "DTC") on May 30, 2014. Inmate Calling Solutions, LLC d/b/a ICSolutions ("ICS") hereby opposes such Motion.

1. ICS timely served Petitioners with its responses to interrogatories and document requests on April 29, 2014. Service was made to three separate attorneys for Petitioners as provided on the case service list. None of the three recipients for Petitioners apparently reviewed any of the materials until May 28, 2014, approximately a month after service, and the additional attorney allegedly not served wasn't on the service list.

2. Service was done in accordance with the Procedural Order dated February 27, 2014 which states, in pertinent part: "Submission of an electronic version of all filings to the Department Secretary and the service list by close of business on the applicable due date with overnight mail to the Department is acceptable." In fact, while it is clear in the Procedural Order that the DTC requires numerous hardcopies, nowhere does it state that hardcopies are required for the parties.

3. ICS expended substantial effort and resources in timely responding to Petitioners' discovery requests and should be entitled to the applicable deadlines provided in the Procedural Order. ICS has a very small business interest in Massachusetts, is seeking no discovery in this case, and should not be burdened with a prolonged discovery process by Petitioners.

For the above reasons, and consistent with the Procedural Order, ICS respectfully requests that the DTC deny Petitioners' Motion.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Ken Dawson', with a long horizontal flourish extending to the right.

Ken Dawson,  
*Director Contracts & Regulatory*  
*Inmate Calling Solutions, LLC*  
*2200 Danbury Street*  
*San Antonio, TX 78217*  
*210-581-8104*