

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

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

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) **D.T.C. 11-16**  
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**CONSENT MOTION TO SUPPLEMENT RESPONSE**

In accordance with the provisions of 220 CMR 1.04(5), Securus Technologies, Inc. (“Securus” or “Company”), acting through undersigned counsel, does hereby move to supplement its response in this proceeding (“Response”) as reflected on the supplement being filed simultaneously with this Consent Motion (“Supplement”). Securus has been authorized by the Petitioners and other Inmate Calling Service (“ICS”) parties to this proceeding to represent that they consent to this motion. In support of this Consent Motion Securus states as follows:

1. Securus timely filed its Response on January 20, 2012. Therein, Securus reported on an investigation of its relevant internal Customer Care Records, as reflected in the Response and Exhibit 8 thereto.

2. To ensure clarity, accuracy and consistency between the discussion in the Response and Exhibit 8 thereto, Securus seeks leave to file the Supplement, which supplements, clarifies and corrects the discussions in its Response regarding the Company’s investigation of its internal Customer Care Records.

**WHEREFORE**, for all of the foregoing reasons, Securus respectfully moves that the Department grant this Consent Motion.

Respectfully submitted

**SECURUS TECHNOLOGIES, INC.**

**By:** /s/ Paul C. Besozzi

Curtis L. Hopfinger  
Director – Regulatory and Government Affairs  
Securus Technologies, Inc.  
14651 Dallas Parkway, 6<sup>th</sup> Floor  
Dallas TX 75254  
972-277-0319 (Tel)  
972-277-0416 (Fax)  
chopfinger@securustech.net

Paul C. Besozzi  
Ryan W. King  
Patton Boggs LLP  
2550 M Street NW  
Washington DC 20037  
202-457-5292 (Tel)  
202-457-6315 (Fax)  
pbsozzi@pattonboggs.com

January 25, 2012

### **CERTIFICATE OF SERVICE**

I, Paul C. Besozzi, hereby certify that on this 25<sup>th</sup> day of January, 2012, I did serve, by first class mail, postage prepaid and by electronic mail a copy of the foregoing "Consent Motion To Supplement Response" on the parties listed on the Service List below issued by the Department:

Kalun Lee Hearing Officer Department of Telecommunications and Cable 1000 Washington Street, 8th fl. Suite 820, Boston MA 02118-6500 <a href="mailto:kalun.lee@state.ma.us">kalun.lee@state.ma.us</a>	Betsy Whittey Hearing Officer Department of Telecommunications and Cable 1000 Washington Street, 8th fl. Suite 820, Boston MA 02118-6500 <a href="mailto:betsy.whittey@state.ma.us">betsy.whittey@state.ma.us</a>
Paul Abbott General Counsel Department of Telecommunications and Cable 1000 Washington Street, 8th Floor, Suite 820 Boston MA 02118-6500 <a href="mailto:paul.abbott@state.ma.us">paul.abbott@state.ma.us</a>	Karlen Reed Director, Competition Division Department of Telecommunications and Cable 1000 Washington Street, 8th Floor, Suite 820 Boston MA 02118-6500 <a href="mailto:karlen.reed@state.ma.us">karlen.reed@state.ma.us</a>
Ben Dobbs Deputy Director Competition Division Department of Telecommunications and Cable 1000 Washington Street, 8th fl. Suite 820 Boston MA 02118-6500 <a href="mailto:benedict.dobbs@state.ma.us">benedict.dobbs@state.ma.us</a>	Joseph Tiernan Competition Division Department of Telecommunications and Cable 1000 Washington Street, 8th fl. Suite 820 Boston MA 02118-6500 <a href="mailto:joseph.tiernan@state.ma.us">joseph.tiernan@state.ma.us</a>
James Pingeon, Esq. Elizabeth Matos, Esq. Bonita Tenneriello, Esq. Prisoners' Legal Services, Inc. 10 Winthrop Square, 3rd floor Boston, MA 02110 <a href="mailto:jpingeon@plsma.org">jpingeon@plsma.org</a> <a href="mailto:lmatos@plsma.org">lmatos@plsma.org</a> <a href="mailto:btenneriello@plsma.org">btenneriello@plsma.org</a>	Patricia Garin, Esq. Stern, Shapiro, Weisberg & Garin 90 Canal St., 5th Floor Boston, MA 02114 <a href="mailto:pgarin@sswg.com">pgarin@sswg.com</a>

Dorothy E. Cukier Executive Director, External and Regulatory Affairs Global Tel*Link Corporation 12021 Sunset Hills Road, Suite 100 Reston, VA 20190 <a href="mailto:dcukier@gtl.net">dcukier@gtl.net</a>	Ken Dawson VP Contracts & Regulatory Inmate Calling Solutions, LLC d/b/a ICSolutions 2200 Danbury St. San Antonio, TX 78217 <a href="mailto:kdawson@icsolutions.com">kdawson@icsolutions.com</a>
Linda Nelson Manager- Regulatory Affairs Securus Technologies, Inc. 14651 Dallas Parkway, Ste. 600 Dallas, TX 75254 <a href="mailto:lnelson@securustech.net">lnelson@securustech.net</a>	Chèrie Kiser Angela F. Collins Cahill Gordon & Reindel LLP 1990 K Street NW Suite 950 Washington DC 20006 <a href="mailto:ckiser@cgrdc.com">ckiser@cgrdc.com</a> <a href="mailto:acollins@cgrdc.com">acollins@cgrdc.com</a>
Catrice C. Williams Secretary Department of Telecommunications and Cable 1000 Washington Street, 8 <sup>th</sup> fl. Suite 820 Boston MA 02118-6500 <a href="mailto:catrice.williams@state.ma.us">catrice.williams@state.ma.us</a> <a href="mailto:Efiling.dtc@state.ma.us">Efiling.dtc@state.ma.us</a>	

/s/ Paul C. Besozzi

Paul C. Besozzi