

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

<hr/>)	
Petition Of Recipients Of Collect Calls)	
From Prisoners at Correctional Institutions)	D.T.C. 11-16
In Massachusetts Seeking Relief from the Unjust)	
And Unreasonable Cost of such Calls)	
<hr/>)	

SUPPLEMENT TO RESPONSE

In accordance with the provisions of 220 CMR 1.00, Securus Technologies, Inc. (“Securus” or “Company”) acting through undersigned counsel, does hereby supplement the Response Of Securus Technologies, Inc. filed in this proceeding on January 20, 2012 (“Response”).

Securus hereby supplements, clarifies and corrects the discussions in its Response regarding its investigation of the Company’s internal Customer Care Records pertaining to the total of thirty-two (32) affiants from among those submitting affidavits with the Petition who (a) specifically mentioned Securus in their affidavits or (b) represented that they had received calls in the past from facilities served by Securus.

Specifically, Securus clarifies that the results of its investigation of its Customer Care Records for these thirty-two (32) individuals revealed a total of only fifteen (15) such Records that reflected contact with Securus Customer Care on any issue. Out of those fifteen (15) Records, three (3) reflected that the contact with Securus Customer Care raised issues comparable to those cited in their respective affidavits. The other twelve (12) did not do so.

Respectfully submitted

SECURUS TECHNOLOGIES, INC.

By: /s/ Paul C. Besozzi

Curtis L. Hopfinger
Director – Regulatory and Government Affairs
Securus Technologies, Inc.
14651 Dallas Parkway, 6th 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 25th day of January, 2012, I did serve, by first class mail, postage prepaid and by electronic mail a copy of the foregoing "Supplement To 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 kalun.lee@state.ma.us	Betsy Whittey Hearing Officer Department of Telecommunications and Cable 1000 Washington Street, 8th fl. Suite 820, Boston MA 02118-6500 betsy.whittey@state.ma.us
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	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
Ben Dobbs Deputy Director Competition Division Department of Telecommunications and Cable 1000 Washington Street, 8th fl. Suite 820 Boston MA 02118-6500 benedict.dobbs@state.ma.us	Joseph Tiernan Competition Division Department of Telecommunications and Cable 1000 Washington Street, 8th fl. Suite 820 Boston MA 02118-6500 joseph.tiernan@state.ma.us
James Pingeon, Esq. Elizabeth Matos, Esq. Bonita Tenneriello, Esq. Prisoners' Legal Services, Inc. 10 Winthrop Square, 3rd floor Boston, MA 02110 jpingeon@plsma.org lmatos@plsma.org btenneriello@plsma.org	Patricia Garin, Esq. Stern, Shapiro, Weisberg & Garin 90 Canal St., 5th Floor Boston, MA 02114 pgarin@sswg.com

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

/s/ Paul C. Besozzi

Paul C. Besozzi