

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Rates for Interstate Inmate Calling Services)	WC Docket No. 12-375
)	
Inmate Calling Services)	
Mandatory Data Collection)	
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**MOTION FOR EXTENSION OF TIME TO RESPOND TO THE
SECOND ONE-TIME MANDATORY DATA COLLECTION FOR ICS PROVIDERS**

Pursuant to 47 C.F.R. §1.46, Legacy Long Distance International, Inc. ("Legacy") respectfully requests an extension of time to respond to the second one-time mandatory data collection required by the Federal Communications Commission ("Commission" or "FCC") in the *ICS Order and FNPRM*,¹ which currently is due March 1, 2019 ("Due Date"). Specifically, Legacy requests a thirty day (30) extension of time, or until April 1, 2019, to respond to the data collection. In support of this Motion, Legacy states:

1. During the timeframe covered by this report, Legacy was acquired by Jail Education Solutions, Inc. d/b/a Edovo. As part of the transaction, the two companies are combining their records and files. This requires transferring files from a physical server to a virtual server. Since Legacy is still in the process of this transition, the requested data from 2014 to 2018 is not readily available in a single system. Therefore, completion of the second one-time mandatory data collection will require Legacy to manually gather and reconcile detailed information across two different systems.

2. Additionally, since Legacy's accounting processes do not currently accommodate the data being sought, gathering the required data is extremely complex. Legacy will not be able

¹ See *Rates for Interstate Inmate Calling Services*, WC Docket No. 12-375, Second Report and Order and Third Further Notice of Proposed Rulemaking, 30 FCC Rcd 12763 (2015) (*Inmate Calling Second Report and Order and Third FNPRM*).

to create, extrapolate, compile, and analyze the detailed data and submit it in the format required², including the D&J, to meet the Commission's specifications with respect to all the requested information by the Due Date.

3. The Commission has granted extensions of time where it was shown that the subject matter is unusually complex and that additional time is necessary to provide the Commission with an adequate response. It has also granted extensions of time when the extension would result in the most complete and well-developed record possible or will allow for more accurate responses. Granting of the requested extension would fulfill all of these important public interests.

4. The Commission may grant an extension of time when good cause is shown. Generally, the Commission's criteria for granting such requests are that the extension be in the public interest, cause no harm to any party in the proceeding, and cause no significant delay. Legacy submits that good cause exists for granting the requested extension of time for submission of the second one-time mandatory data collection.

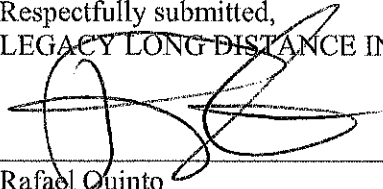
5. In this case, the public interest will not be harmed by the requested extension since it will ensure that the Commission has the most complete and correct version of the required information. Nor will a grant of the requested extension of time cause undue delay to the Commission's efforts to identify and track trends in the ICS market and monitor compliance with the reforms it adopted. The additional time will permit a primary competitor in the ICS marketplace to provide the most accurate and complete information in response to the data collection, which will facilitate a more complete record. Accordingly, the requested extension will cause no harm to any party and will not unduly delay the Commission's deliberations.

² The data collection requires Legacy to characterize its 144 correctional facilities into 50 separate elements. All of the requested information must be supplied for the five (5) year reporting period consisting of calendar year 2014 through calendar year 2018. All of the reported data must be accompanied by the "Description and Justification" ("D&J") that fully clarifies and explains the formulas, explanations, and references for calculations.

CONCLUSION

Accordingly, for good cause as set forth above, Legacy respectfully requests that the Commission extend the deadline for filing its response to the second one-time mandatory data collection by thirty (30) days, or until April 1, 2019.

Respectfully submitted,
LEGACY LONG DISTANCE INTERNATIONAL, INC., by

A handwritten signature in black ink, appearing to read 'Rafael Quinto', is written over a horizontal line.

Rafael Quinto
Director, Billing and Regulatory Operations
Legacy Inmate Communications
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Verification

I hereby certify that the information contained in this Motion for Extension of Time to Respond to the Second One-Time Mandatory Data Collection for ICS Providers is true and correct to the best of my knowledge.

By: Rafael Quinto
Title: Director, Billing & Regulatory
Date: 2/21/19