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October 31, 2019

VIA OVERNIGHT DELIVERY AND ECFS

Ms. Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
9050 Junction Drive
Annapolis Junction, MD 20701

REDACTED – FOR PUBLIC INSPECTION

RE: Legacy Long Distance International, Inc.
WC Docket No. 12-375, *In the Matter of Inmate Calling Services*;
Annual Inmate Calling Services Report and Mandatory Data Collection

Ms. Dortch,

My name is Brian Hill and I am the founder and CEO of Jail Education Solutions, Inc. d/b/a Edovo ("Edovo"). Edovo acquired Legacy Long Distance International, Inc. d/b/a Legacy Inmate Communications ("Legacy") in May 2018. In early 2019, while preparing data to submit Legacy's 2018 Annual ICS Report/Form 2301(a) filing ("ICS Report"), Edovo encountered difficulty in replicating the methodology previously used by Legacy to submit the 2017 ICS Report. Edovo delayed the filing of Legacy's 2018 ICS Report and the mandatory one time data collection while it investigated the source of the difficulty.

Due to Edovo's unfamiliarity with the details of Legacy's ICS records and prior procedures, the Company's process for preparing the 2018 ICS Report took an extended period of time. Edovo quickly encountered difficulties replicating the process previously used by Legacy and began to investigate the issues further. During this process, Legacy refrained from filing the 2018 ICS Report on the due date. Edovo's goal was to ensure that the data it provided to the Commission would be correct and that it conducted the queries used to compile the data in manner that the Company could easily replicate for future filings. In going through this process and validating the data Edovo identified some areas for improvement and a few issues in the data that was submitted in the calendar year 2017 ICS Report.

Edovo is now ready to submit a revised 2017 ICS report, a 2018 ICS Report and data for the mandatory one-time data collection. Pursuant to our discussions with the Wireline Competition Bureau ("Bureau") staff, Edovo is submitting all data in the requested Excel format to make it easier for review. In addition to the data submission, Edovo has included a document with notes and summarized key items in the filing in order to provide context on the data digest. Edovo shares this information with the Bureau in complete transparency as a recognition that we need to do better and as a demonstration of our commitment to do so. Legacy pledges to work with the Bureau to remedy any harms caused by the issues or incorrect information it identified.

This data is being submitted pursuant to the Protective Order¹ issued in the above referenced docket. Legacy herein submits an original and one (1) copy of this letter and a CD Rom containing the confidential version of the data for its 2017 and 2018 ICS Report as well as the one-time Mandatory Data Collection via overnight delivery. Redacted copies of Legacy's 2017 and 2018 ICS Report and one-time Mandatory Data Collection have been filed with the Commission via ECFS. A confidential version of Legacy's second one-time Mandatory Data Collection has also been emailed to Gil Strobel of the Wireline Competition Bureau.

Any questions regarding this filing should be directed to my attention. I appreciate your patience and grace in allowing us the time to submit this data the right way and I look forward to working with you.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Hill". The signature is fluid and cursive, with the first name "Brian" and last name "Hill" clearly distinguishable.

Brian Hill

CEO

(602) 403-9905

brian@edovo.com

cc: William Kehoe, Wireline Competition Bureau
Minsoo Kim, Wireline Competition Bureau
Gil Strobel, Wireline Competition Bureau

¹ See *Rates for Interstate Inmate Calling Services*, Protective Order, WC Docket No. 12-375, 28 FCC Rcd 16954 (Wireline Comp. Bur. 2013) (*Protective Order*).