

**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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**SECOND 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 a second 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*,<sup>1</sup> which was due March 1, 2019 ("Due Date"). Specifically, Legacy requests an additional ten (10) day extension of time, or until April 12, 2019, to respond to the data collection. In support of this Motion, Legacy states:

1. On February 25, 2019, Legacy filed a Motion for Extension to Respond to the Second One-Time Mandatory Data Collection for ICS Providers.
2. Legacy has been preparing the information for filing by the requested extension date of April 1, 2019.
3. As stated in the original request, Legacy was acquired by Jail Education Solutions, Inc. d/b/a Edovo. As part of the transaction, the two companies have completed the combination of the records and files onto the virtual server, but this task took longer than anticipated. Legacy therefore requires an additional ten (10) days to complete the second one-time mandatory data collection.

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<sup>1</sup> 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*).

4. 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.

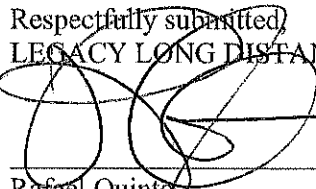
5. The Commission may grant an extension of time when good cause is shown. Generally, the Commission's criteria for granting such requests are that the extension be in the public interest, cause no harm to any party in the proceeding, and cause no significant delay. Legacy submits that good cause exists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

6. 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.

## 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 an additional ten (10) days, or until April 12, 2019.

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



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Rafael Quinto  
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Verification

I hereby certify that the information contained in this Second 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: 

Title: Director, Billing & Regulatory Operations

Date: 9/26/9