

CAHILL GORDON & REINDEL LLP  
EIGHTY PINE STREET  
NEW YORK, NY 10005-1702

ROBERT A. ALESSI  
HELENE R. BANKS  
ANIRUDH BANSAL  
DAVID L. BARASH  
LANDIS C. BEST  
BRADLEY J. BONDI  
BROCKTON B. BOSSON  
JAMES J. CLARK  
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JOAN MURTAGH FRANKEL  
JONATHAN J. FRANKEL  
PIERRE M. GENTIN

CHARLES A. GILMAN  
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JASON M. HALL  
WILLIAM M. HARTNETT  
NOLA B. HELLER  
CRAIG M. HOROWITZ  
DOUGLAS S. HOROWITZ  
TIMOTHY B. HOWELL  
DAVID G. JANUSZEWSKI  
ELAI KATZ  
BRIAN S. KELLEHER  
RICHARD KELLY  
CHÉRIE R. KISER\*  
JOEL KURTZBERG  
TED B. LACEY  
MARC R. LASHBROOK  
ALIZA R. LEVINE

TELEPHONE: (212) 701-3000  
WWW.CAHILL.COM

1990 K STREET, N.W.  
WASHINGTON, DC 20006-1181  
(202) 862-8900

CAHILL GORDON & REINDEL (UK) LLP  
24 MONUMENT STREET  
LONDON EC3R 8AJ  
+44 (0)20 7920 9800

WRITER'S DIRECT NUMBER

202-862-8950  
ckiser@cahill.com

JOEL H. LEVITIN  
GEOFFREY E. LIEBMANN  
BRIAN T. MARKLEY  
WILLIAM J. MILLER  
NOAH B. NEWITZ  
MICHAEL J. OHLER  
DAVID R. OWEN  
JOHN PAPACHRISTOS  
LUIS R. PENALVER  
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MICHAEL W. REDDY  
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TAMMY L. ROY  
JONATHAN A. SCHAFFZIN

MICHAEL A. SHERMAN  
DARREN SILVER  
JOSIAH M. SLOTNICK  
RICHARD A. STIEGLITZ JR.  
SUSANNA M. SUH  
ANTHONY K. TAMA  
JONATHAN D. THIER  
SEAN P. TONOLLI\*  
JOHN A. TRIPODORO  
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S. PENNY WINDLE  
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COREY WRIGHT  
JOSHUA M. ZELIG  
DANIEL J. ZUBKOFF

\*ADMITTED IN DC ONLY

May 3, 2018

**Via ECFS (Public Version) and  
Hand Delivery (Confidential Version)**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: WC Docket No. 12-375  
Global Tel\*Link Corporation Amended Annual Report and Certification**

Dear Secretary Dortch:

Global Tel\*Link Corporation (“GTL”),<sup>1</sup> by its attorneys, respectfully submits its Amended Annual Report and Certification for calendar year 2017. GTL provides its Amended Annual Report and Certification in accordance with the requirements of the *Protective Order* previously adopted in this proceeding.<sup>2</sup> Specifically, GTL provides a REDACTED version of its response via ECFS, and a CONFIDENTIAL version of its response in hard copy to the Secretary’s Office. The amendment corrects a formula error discovered in the last row of Section III.

Under the *Protective Order*, “Confidential Information” is “information that is not otherwise available from publicly available sources and that is subject to protection under the

<sup>1</sup> The Amended Annual Report and Certification is being filed by GTL on behalf of itself and its wholly owned subsidiaries that also provide inmate calling services: DSI-ITI, Inc., Public Communications Services, Inc., and Value-Added Communications, Inc.

<sup>2</sup> *Rates for Interstate Inmate Calling Services*, 28 FCC Rcd 16954 (2013) (“*Protective Order*”).

Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, and the Commission’s implementing rules.”<sup>3</sup> The *Protective Order* states that a party “designating documents and information as Confidential” pursuant to the *Protective Order* “will be deemed to have submitted a request that the material not be made routinely available for public inspection under the Commission’s rules.”<sup>4</sup>

FOIA exempts from disclosure “trade secrets and commercial or financial information obtained from a person and privileged or confidential” information.<sup>5</sup> Similarly, the Commission’s rules state that such information is not routinely available for public inspection.<sup>6</sup> The Commission’s rules also allow parties to seek protection for information that is “commercial or financial, or contains a trade secret or is privileged” or when “disclosure of the information could result in substantial competitive harm.”<sup>7</sup>

GTL has designated its entire Annual Report as Confidential Information under the *Protective Order*. Information concerning “business operations and plans” routinely has been withheld as disclosure could damage a company’s “competitive position by giving the competitors insight into [the company]’s business methods and strategies.”<sup>8</sup> Further, information that has “the potential of revealing [a company]’s market plans and positions” or providing “insight into [a company]’s business strategies” also has been deemed exempt from mandatory public disclosure.<sup>9</sup> The Commission has held “revenue information to be the type of competitively sensitive material that should be withheld under” FOIA.<sup>10</sup> The Commission also has found financial information should be withheld from disclosure “because this material is competitively sensitive and therefore confidential” under FOIA.<sup>11</sup> Accordingly, the information designated by GTL as Confidential Information herein is the type of material routinely protected from disclosure under FOIA and the Commission’s rules.

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<sup>3</sup> *Protective Order* ¶ 2.

<sup>4</sup> *Protective Order* ¶ 3 (citing 47 C.F.R. §§ 0.459(a), 0.459(a)(3)).

<sup>5</sup> 5 U.S.C. § 552(b)(4).

<sup>6</sup> 47 C.F.R. § 0.457(d).

<sup>7</sup> 47 C.F.R. §§ 0.459(b)(3), 0.459(b)(5).

<sup>8</sup> *Josh Wein, Warren Communications News on Request for Inspection of Records*, 24 FCC Rcd 12347, ¶ 13 (2009).

<sup>9</sup> *Local Exchange Carriers’ Rates, Terms, and Conditions for Expanded Interconnection through Virtual Collocation for Special Access and Switched Transport*, 13 FCC Rcd 13354, ¶ 9 (1998); see also *Jonathan E. Canis, Frank W. Krogh, Richard J. Metzger*, 9 FCC Rcd 6495 (1994).

<sup>10</sup> *The Consumer Law Group*, 28 FCC Rcd 684, ¶ 6 (2013); see also *The Lakin Law Firm, P.C.*, 19 FCC Rcd 12727 ¶ 6 (2004); FOIA Control No. 2002-268, Letter from Joseph T. Hall to Fred B. Campbell, Harris Wiltshire & Grannis (July 8, 2002); FOIA Control No. 2002-351, Letter from Joseph T. Hall to Roy Thompson, Black Radio Network (Aug. 19, 2002); *John E. Wall, Jr.*, 22 FCC Rcd 2561 (2007).

<sup>11</sup> *Sandwich Isles Communications, Inc. on Request for Inspection of Records*, 28 FCC Rcd 15253, ¶ 7 (2013).

Please contact me if you have any questions regarding this matter.

Respectfully submitted,

*/s/ Chérie R. Kiser*

Chérie R. Kiser

Counsel for Global Tel\*Link Corporation

Enclosure

cc: Lynne Engledow

**In the Matter of Interstate Inmate Calling Services  
WC Docket No. 12-375  
Annual Reporting Form**

**FCC Form 2301(a)**

**OMB Control No. 3060-1222**

**Instructions:** Please read this form carefully before completing. This form is to be completed by an officer of each provider of inmate calling services (ICS). If the provider seeks confidential treatment of any information, consistent with our rules and the Protective Order in place in this proceeding, it should identify the specific information which it claims is subject to confidential treatment.

**I. Basic Information**

<b>1. Provider Name:</b>  Global Tel*Link Corporation**	<b>2. Reporting Period:</b>  2017 (as amended)
<b>3. Officer Name, Title:</b>  Charles Stephen Yow, Chief Financial Officer	
<b>4. Officer Telephone Number:</b>  251-338-8877	<b>5. Officer E-Mail Address:</b>  Steve.Yow@gtl.net
<b>6. Total Number of Correctional Facilities Served by Provider:</b>  ■	
<b>7. Number of Prisons Served by Provider:</b>  ■	
<b>8. Number of Jails Served by Provider with Average Daily Population (ADP) of 0-350:</b>  ■	
<b>9. Number of Jails Served by Provider with ADP of 350-999:</b>  ■	
<b>10. Number of Jails Served by Provider with ADP of 1000 or more:</b>  ■	

\*\* This Report is being filed by Global Tel\*Link Corporation on behalf of itself and its wholly owned subsidiaries that also provide inmate calling services: DSI-ITI, Inc., Public Communications Services, Inc., and Value-Added Communications, Inc.

REDACTED - FOR PUBLIC INSPECTION

II. ICS Rates

Facility / Contract Name	Facility Type	ADP	Intrastate Rate	Intrastate Rates Different than Listed Rates	Interstate Rates	Interstate Rates Different from Listed Rate	International Rate
[REDACTED]							

II. ICS Rates

Facility / Contract Name	Facility Type	ADP	Intrastate Rate	Intrastate Rates Different than Listed Rates	Interstate Rates	Interstate Rates Different from Listed Rate	International Rate
[REDACTED]							

II. ICS Rates

Facility / Contract Name	Facility Type	ADP	Intrastate Rate	Intrastate Rates Different than Listed Rates	Interstate Rates	Interstate Rates Different from Listed Rate	International Rate
[REDACTED]							

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Facility / Contract Name	Facility Type	ADP	Intrastate Rate	Intrastate Rates Different than Listed Rates	Interstate Rates	Interstate Rates Different from Listed Rate	International Rate
[REDACTED]							



II. ICS Rates

Facility / Contract Name	Facility Type	ADP	Intrastate Rate	Intrastate Rates Different than Listed Rates	Interstate Rates	Interstate Rates Different from Listed Rate	International Rate
[REDACTED]							

II. ICS Rates

Facility / Contract Name	Facility Type	ADP	Intrastate Rate	Intrastate Rates Different than Listed Rates	Interstate Rates	Interstate Rates Different from Listed Rate	International Rate

Date	Account ID	Site Name	COWLEY						ADD-PEG						WIMBORNE					
			Local Lat Min	Local Add Min	Interstate Lat Min	Interstate Add Min	Interstate Lat Min	Interstate Add Min	Local Lat Min	Local Add Min	Interstate Lat Min	Interstate Add Min	Interstate Lat Min	Interstate Add Min	Local Lat Min	Local Add Min	Interstate Lat Min	Interstate Add Min		

III. Ancillary Service Charges

Facility / Contract Name	Facility Type	ADP	Automated service charge fee	Automated service charge fee	Automated service fee amount	# of times automated service fees were charged	Single call fee	Single call fee amount	# of times single call fees were charged	Live Operation fee Charge	Live Op fee Amount	# of times Live Op Fees were charged	Paper bill Stmt fee charge	Paper bill Stmt fee charge	Paper bill stmt fee Amount	# of times paper bill statement fees were charged	Reg fees pre-FCC	Reg fee amount	# of times Reg Fee was charged
[REDACTED]																			

REDACTED - FOR PUBLIC INSPECTION

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Facility / Contract Name	Facility Type	ADP	Automated service charge fee	Automated service charge fee	Automated service fee amount	# of times automated service fees were charged	Single call fee	Single call fee amount	# of times single call fees were charged	Live Operation fee Charge	Live Op fee Amount	# of times Live Op Fees were charged	Paper bill Stmt fee charge	Paper bill Stmt fee charge	Paper bill stmt fee Amount	# of times paper bill statement fees were charged	Reg fees pre-FCC	Reg fee amount	# of times Reg Fee was charged
[REDACTED]																			

REDACTED - FOR PUBLIC INSPECTION

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[REDACTED]																			

REDACTED - FOR PUBLIC INSPECTION

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[REDACTED]																			

REDACTED - FOR PUBLIC INSPECTION

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REDACTED - FOR PUBLIC INSPECTION



IV. Variable Site Commission Payments

Facility / Contract Name	Facility Type	ADP	Average Monthly Amount of Variable Site Commission Payments
[REDACTED]			

IV. Variable Site Commission Payments

Facility / Contract Name	Facility Type	ADP	Average Monthly Amount of Variable Site Commission Payments
[REDACTED]			

IV. Variable Site Commission Payments

Facility / Contract Name	Facility Type	ADP	Average Monthly Amount of Variable Site Commission Payments
[REDACTED]			

IV. Variable Site Commission Payments

Facility / Contract Name	Facility Type	ADP	Average Monthly Amount of Variable Site Commission Payments
[REDACTED]			

IV. Variable Site Commission Payments

Facility / Contract Name	Facility Type	ADP	Average Monthly Amount of Variable Site Commission Payments
[REDACTED]			

IV. Variable Site Commission Payments

Facility / Contract Name	Facility Type	ADP	Average Monthly Amount of Variable Site Commission Payments
[REDACTED]			

IV. Variable Site Commission Payments

Facility / Contract Name	Facility Type	ADP	Average Monthly Amount of Variable Site Commission Payments
[REDACTED]			

IV. Variable Site Commission Payments

Facility / Contract Name	Facility Type	ADP	Average Monthly Amount of Variable Site Commission Payments
[REDACTED]			



IV. Variable Site Commission Payments

Facility / Contract Name	Facility Type	ADP	Average Monthly Amount of Variable Site Commission Payments
[REDACTED]			

V. Fixed Site Commission

Facility / Contract Name	Facility Identifier	Fixed Site Commission Required by Contract	Facility Type	ADP
[REDACTED]				

V. Fixed Site Commission

Facility / Contract Name	Facility Identifier	Fixed Site Commission Required by Contract	Facility Type	ADP
[REDACTED]				

V. Fixed Site Commission

Facility / Contract Name	Facility Identifier	Fixed Site Commission Required by Contract	Facility Type	ADP
[REDACTED]				

V. Fixed Site Commission

Facility / Contract Name	Facility Identifier	Fixed Site Commission Required by Contract	Facility Type	ADP
[REDACTED]				

V. Fixed Site Commission

Facility / Contract Name	Facility Identifier	Fixed Site Commission Required by Contract	Facility Type	ADP
[REDACTED]				

V. Fixed Site Commission

Facility / Contract Name	Facility Identifier	Fixed Site Commission Required by Contract	Facility Type	ADP
[REDACTED]				

V. Fixed Site Commission

Facility / Contract Name	Facility Identifier	Fixed Site Commission Required by Contract	Facility Type	ADP
[REDACTED]				



V. Fixed Site Commission

Facility / Contract Name	Facility Identifier	Fixed Site Commission Required by Contract	Facility Type	ADP
[REDACTED]				

V. Fixed Site Commission

Facility / Contract Name	Facility Identifier	Fixed Site Commission Required by Contract	Facility Type	ADP
[REDACTED]				

FCC Form 2301(b) Estimated Time Per Response: 5 Hours

**Inmate Calling Services Annual Certification Form**

Please Read Instructions Before Completing (To Be Completed by Service Provider)

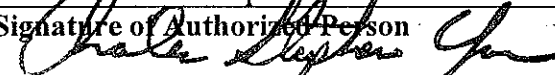
<b>1. Name of Service Provider</b> Global Tel*Link Corporation**	<b>2. Reporting Year</b> 2017 (as amended)	
<b>3. Officer Name, Title</b> Charles Stephen Yow, Chief Financial Officer		
<b>4. Mailing Address of Officer</b> <b>Street Address</b> 12021 Sunset Hills Road, Suite 100		
<b>City</b> Reston, VA 20190	<b>State</b>	<b>Zip Code</b>
<b>5. Telephone Number</b> 251-338-8877		
<b>6. Email Address</b> Steve.Yow@gtl.net		

**Block 2: Certification**

The chief executive officer (CEO), chief financial officer (CFO), or other senior executive with first-hand knowledge of the accuracy and completeness of the information provided must certify as follows:

I swear under penalty of perjury that:

- (i) I Charles Stephen Yow, CFO (name and title), am an officer of the above-named service provider and am authorized to submit the attached Annual Reports on behalf of the service provider;
- (ii) I have examined the attached Annual Reporting Forms and all requested information has been provided;
- (iii) Based on information known to me, or provided to me by employees responsible for the data being submitted, all statements of fact, as well as all data, are true and accurate; and
- (iv) The above-named service provider is in compliance with the Federal Communications Commission's rules governing inmate calling services (ICS). I acknowledge that failure to comply with the rules governing ICS may result in civil or criminal prosecution.

<b>9. Signature of Authorized Person</b> 	<b>10. Date</b> 5/3/2018
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**11. Printed name of Authorized Person**  
Charles Stephen Yow

\*\* This Certification is being filed by Global Tel\*Link Corporation on behalf of itself and its wholly owned subsidiaries that also provide inmate calling services: DSI-ITI, Inc., Public Communications Services, Inc., and Value-Added Communications, Inc.