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

In the Matter of the Joint Application of

**Embarq Corporation**, Transferor,

and

**Securus Technologies, LLC**, Transferee

Pursuant to Section 214 Under the Communications Act of 1934, as Amended

JOINT APPLICATION FOR CONSENT TO TRANSFER CONTROL OF DOMESTIC SECTION 214 AUTHORIZATION

Pursuant to Section 214 of the Communications Act (“Act”), as amended, 47 U.S.C. § 214, and Sections 63.03 and 63.04 of the rules of the Federal Communications Commission (“Commission”), 47 C.F.R. §§ 63.03 and 63.04, Embarq Corporation (“Embarq” or “Transferor”) and Securus Technologies, LLC (“Securus” or “Transferee”) (collectively “Applicants”) request Commission consent to transfer control of Preferred Communications of Texas, LLC (“Preferred” or “Licensee”) from Embarq to Securus. Embarq currently holds all of the membership interests in Preferred, which holds blanket domestic Section 214 authority from the Commission. Preferred’s sole asset is the contract to provide services to the Texas Department of Criminal Justice (“TDCJ” and “TDCJ Contract”) for which Securus is the subcontractor. Embarq formed Preferred last year to hold the TDCJ Contract when it sold the rest
of its incarcerated calling services (“ICS”) to Inmate Calling Solutions, LLC (d/b/a ICSolutions).

With the transfer of Preferred, Embarq will completely exit the ICS market.

As the subcontractor to the TDCJ Contract, Securus is well positioned to ensure that services continue without disruption or increased costs and that the transition will be virtually transparent to consumers. Securus plans to maintain the same rates, terms and conditions as the existing contract, as required by the TDCJ Contract. Additionally, consumers will reap the benefits of Securus’ transformational initiatives to improve communications services for incarcerated persons and their families and loved ones.

This transaction is substantially similar to transactions approved last year in which Embarq sold its ICS business, except for the TDCJ Contract, to ICSolutions and Legacy sold ICS contracts, assets and customers to Global Tel*Link as part of Legacy’s withdrawal from the ICS business. As with those transactions, Securus’ proposed acquisition of Preferred will have no adverse impact on the market as Embarq is exiting the ICS business. The Applicants also respectfully request streamlined treatment pursuant to Section 63.03(b).

I. DESCRIPTION OF THE PARTIES

A. The Transferor and Licensee

Embarq is a Delaware corporation with its principal place of business located at 100 CenturyLink Drive, Monroe, Louisiana 71203. Embarq is a wholly-owned direct subsidiary of Lumen Technologies, Inc., a Louisiana corporation and publicly traded on the New York Stock Exchange, with its principal place of business located at 100 CenturyLink Drive, Monroe, Louisiana 71203. Lumen Technologies, Inc. is an international facilities-based communications company engaged, through its various subsidiaries and operating companies, in providing a broad array of integrated services to business and residential customers.
Preferred, which is a wholly-owned direct subsidiary of Embarq, is a Delaware limited liability company with its principal place of business located at 100 CenturyLink Drive, Monroe, Louisiana 71203. As Embarq informed the Commission in its Joint Application last year transferring control of the vast majority of CenturyLink Public Communications, Inc. (“CPCI”) to ICSolutions, CPCI transferred the TDCJ Contract to another Embarq affiliate, which is Preferred.¹ As the prime contractor under that contract, Preferred provides customer account creation and maintenance services related to inmate calling to the TDCJ for inmates and their families. Preferred relies on Securus to provide the call routing and complex back-office, security and other software-based features and services necessary to fulfill the TDCJ contract. The TDCJ Contract is Preferred’s sole line of business.

B. The Transferee

Securus is a Delaware limited liability company with its principal place of business at 4000 International Parkway, Carrollton, Texas, 75007. Securus is a wholly-owned subsidiary of Aventiv Technologies, LLC. Securus is an indirect, wholly-owned subsidiary of SCRS Acquisition Corporation (“SCRS”) and, in turn, its parent, SCRS Holding Corporation (“SCRS Parent”), both Delaware corporations. The ultimate majority ownership of Securus is Platinum Equity Capital Partners, IV, L.P., a Delaware limited partnership, which is a private equity investment vehicle sponsored by Platinum Equity, LLC. Securus provides a host of services and products to incarcerated individuals, including ICS, in the District of Columbia and 47 states.

II. DESCRIPTION OF THE TRANSACTION

On June 9, 2021, Embarq and Securus entered into a Membership Purchase Agreement (the “Agreement”). Pursuant to the Agreement, Securus will acquire from Embarq all of the

¹ Joint Application for Consent to Transfer Control of CenturyLink Public Communications, Inc. Pursuant to Section 214 of the Communications Act of 1934, As Amended, WC Docket No. 20-150 (filed May 22, 2020).
membership interests and all of the equity in Preferred. At the close of transaction, Preferred will become a wholly-owned subsidiary of Securus Technologies, LLC.

Organizational charts illustrating the current and post-closing corporate structure of Preferred are provided as Exhibit A.

III. PUBLIC INTEREST STATEMENT

The proposed transaction will serve the public interest. It will ensure that persons incarcerated in TDCJ correctional facilities will continue to receive high quality communications services without interruption, loss, impairment or disruption of service as Embarq finalizes its planned withdrawal from the ICS industry. Securus plans to maintain the same rates, terms and conditions of the existing contract and is contractually required to assume, perform and be bound by the covenants, obligations and agreements in the contract. In short, the contract will remain in full force and effect with TDCJ’s consent. Securus already services the TDCJ Contract as Embarq’s subcontractor ensuring a seamless transition that will be transparent to consumers. Moreover, persons incarcerated in the TDCJ system and their families will benefit from Securus’ transformational initiative to improve its services. The company launched this initiative last year following change in ownership and leadership. The transaction will not harm competition as it effectively involves the assignment of a single, albeit substantial, contract that Securus already services by a provider that is exiting the ICS business altogether. In that respect, this transaction is very similar to the Global Tel*Link/Legacy transaction that the Commission approved in November.²

The TDCJ Contract

The current TDCJ Contract was entered into with Embarq on September 1, 2018. Pursuant to Texas law, ICS contracts must extend for a period of at least seven years and include two-year optional renewal terms. The initial term of the TDCJ Contract thus expires in August 2025 and it reserves for the TDCJ the right to exercise three optional two-year renewal terms. At the time of the signing, the TDCJ Contract included 110 facilities of various sizes, including four facilities that were either mothballed or showed zero population, and included an estimated 155,239 incarcerated persons, of which an estimated 134,064 were eligible to make use of the services. Currently, the TDCJ facilities have a total ADP of approximately 120,000. The rate for all ICS calls under the contract is $0.06 per minute. The Texas Government Code also includes a lengthy list of requirements that the provider must meet.

The TDCJ Contract requires the approval of the TDCJ to assign the contract, which it may withhold in its sole discretion. The TDCJ also has the sole discretion to terminate the contract upon a transfer of control. If the TDCJ consents, Securus must agree in writing with the TDCJ that Securus will abide by all of the covenants, obligations, and agreements in the TDCJ Contract.

The parties have provided notice to the TDCJ of the proposed transaction. The parties expect that the TDCJ will inform the parties soon regarding its determination. The parties will keep the Commission apprised of further actions by the TDCJ.

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3 Tex. Gov’t Code Ann. § 495.027(b) (“The board shall award a contract to a single vendor to install, operate and maintain the inmate pay telephone service. The initial term of the contract may not be less than seven years. The contract must provide the board with the option of renewing the contract for additional two-year terms.”). 4 The Texas Government Code tasks the TDCJ with adopting policies determining eligibility to use the inmate pay telephone service. Tex. Gov’t Code Ann. § 495.027(d).
The Proposed Transaction Will Ensure a Seamless Transition for Consumers

Securus has the experience and resources to ensure the continuation of high-quality service to persons incarcerated in TDCJ facilities and their families and loved ones. As noted, Securus plans to continue to provide service under existing rates, terms and conditions of the TDCJ Contract, which the Commission has previously deemed to be a “public benefit when reviewing a transaction between inmate calling service providers.”6 As Embarq’s subcontractor, Securus already provides the calling equipment, calling platform, call routing, software, monitoring, recording, storage, billing and collections, maintenance, technical support and site administration, and other essential network and related functions under the TDCJ Contract. Securus thus has a significant pre-existing relationship with TDCJ and the current consumer base, as well as a unique familiarity with the operations provided by Embarq as part of the TDCJ Contract, which will ultimately be assumed by Securus as part of the proposed transaction. Among other functions, Securus’ equipment facilitates the provision of video relay services that allow hearing-impaired individuals to communicate using American Sign Language. Securus will ensure that video relay services continue to be made available free of charge as set forth in the existing contract.

Although it is the party to the TDCJ Contract, Preferred’s role is limited. Its primary function is account management, including enrollment, refunds and related reporting. It operates a call center to directly engage with incarcerated persons and their families. To further ensure a transparent transition, the transaction contemplates that Embarq call center employees that interact with TDCJ incarcerated persons and their families will have the opportunity to stay in their current positions as employees of Securus.

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6 GTL Order, 35 FCC Rcd at 13094.
Persons Incarcerated in the TDCJ System Will Benefit from Securus’ Transformational Efforts

Individuals incarcerated in the TDCJ systems and their families will also benefit from Securus’ transformational commitments to providing more responsive and innovative services that the company announced at the beginning of 2020 following its reorganization and change in management.\(^7\)

It made substantial progress toward meeting those commitments in its first year, 2020. For example, Securus reduced certain third-party financial fees, offered a prepaid card option that reduced costs to transfer funds by 30%, and announced a subscription plan that provides consumers with a simple, pre-set monthly charge for in-state calls. It is piloting subscription service plans at two sites in Texas for in-state calls. To reduce recidivism and improve educational and post-incarceration employment opportunities, Securus increased its engagement with, and funding of, institutions dedicated to these goals, provided free educational programming to an additional 13,546 incarcerated students, and made the free 60,000 e-book library from the Gutenberg Project available using Securus-provided tablets. It invested $2.3 million in new infrastructure to support modern technology and launched updated, secure digital tablets for training, education and communications.\(^8\)

Securus has renewed and introduced new commitments for 2021.\(^9\) Securus is making substantial progress toward meeting these new commitments, including significant new hires to oversee the transformation. In addition to bringing on a new CEO, it recently hired Yusef Jackson to guide the company’s transformational efforts and facilitate external partnerships with

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\(^8\) A more complete list of efforts to meet its commitments undertaken and completed in 2020 can be found at [https://transformation.aventiv.com/2020-commitments/](https://transformation.aventiv.com/2020-commitments/)

civic, educational, religious, community groups and businesses. Mr. Jackson has decades of experience working with corporate leaders, engaging consumer communities and driving structural change to combat systemic racism. In May, Securus hired another leading expert to head a newly launched Post-Incarceration Business Unit to focus on identifying more opportunities to support individuals after release.\(^{10}\)

In addition to adding diversity to its internal efforts, the company continues to work with correctional authorities and other institutions to improve opportunities for incarcerated individuals. It has launched a new Community Impact Fund that makes grants to non-profit groups that work to reduce recidivism in Texas and two other states.

The Transaction Will Not Adversely Affect Competition

The proposed transaction poses no harm to competition. The transaction is the final step in Embarq’s plan to exit the ICS business and is virtually identical to recently approved transactions that the Commission has found are unlikely to result in competitive harm. As the Commission stated last year in approving the transfer of 14 contracts from Legacy, which was exiting the market, to the largest ICS provider, Global Tel*Link:

“Unlike proposed transactions where a carrier seeks to acquire and eliminate an independent growing competitor, Legacy has chosen to exit the inmate calling services industry, after considering other alternatives, for its own business reasons. In doing so, it has worked to ensure continuity of service for its correctional facility customers through transactions with existing inmate calling services providers that could seamlessly honor the transferred contracts.”\(^{11}\)

This transaction concludes the process of withdrawal that Embarq substantially completed with its transfer of 100% of the stock of CenturyLink Public Communications to

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\(^{11}\) GTL Order, 35 FCC Rcd at 13092.
ICSolutions, which the Commission approved last year.\textsuperscript{12} In approving that transaction, the Commission relied on two factors that are prevalent here, that ICSolutions was the subcontractor for contracts being transferred, ensuring “that incarcerated individuals and their families will continue to receive all services post-merger without disruption,” and that the transaction would not result in “the potential loss of an independent competitor.”\textsuperscript{13}

This transaction does not eliminate any competitors from the market and numerous competitors would remain after this proposed transaction. As the Commission recognized in approving the Global Tel*Link’s acquisition of Legacy’s contracts, “other inmate calling service providers will remain in the industry to compete for these contracts when they are publicly rebid, as typically occurs in this industry.”\textsuperscript{14} These competitors include not only Global Tel*Link, the country’s largest provider, but a significantly strengthened ICSolutions following its acquisition of the vast majority of Embarq’s contracts last year.\textsuperscript{15}

Although the transaction nominally shifts the incarcerated population under the TDCJ from CenturyLink to Securus, which would now hold the contract if approved, it will not materially change Securus’ position in the industry so as to raise competitive concerns. Securus’ systems and equipment already serve this population, thus, scale or scope efficiencies, if any, from serving this population have already been captured. The transaction confers no material advantages to Securus in seeking to compete for other contracts and its opportunity to continue to serve the TDCJ contract when rebid are not substantially improved over its current position as

\textsuperscript{12} Applications Granted for the Transfer of Control of CenturyLink Public Communications, Inc. to Inmate Calling Solutions, LLC D/B/A ICSolutions, Public Notice, DA 20-866, WC Docket No. 20-150, 35 FCC Rcd 8661 (2020) (\textit{ICSolutions Order}). As the Commission noted in approving that transaction, Embarq would transfer its contract with the TDCJ to another affiliate, which is Preferred. \textit{Id.} at 8662.

\textsuperscript{13} \textit{ICSolutions Order}, 35 FCC Rcd at 8663-64.

\textsuperscript{14} \textit{GTL Order}, 35 FCC Rcd at 13092.

\textsuperscript{15} \textit{ICSolutions Order}, 35 FCC Rcd at 8664 (“We also agree with Applicants that post-merger, ICSolutions will be better positioned to more effectively competitively bid for service contracts, especially larger state department of corrections contracts”).
the provider of the ICS system for TDCJ facilities. Moreover, as described above, communications services to the TDCJ incarcerated population will continue without interruption and incarcerated persons will reap the benefits of Securus’ transformational initiatives.

IV. INFORMATION REQUIRED BY SECTION 63.04 OF THE COMMISSION’S RULES IN RELATION TO THE TRANSFER OF BLANKET DOMESTIC 214 AUTHORITY

In support of their request for consent to transfer control of Preferred to Securus, the Applicants submit the following information pursuant to Section 63.04(a)(1)-(12):

(a)(1) Name, address and telephone number of each Applicant

Transferee:
Securus Technologies, LLC  
4000 International Parkway  
Carrollton, Texas 75007  
972-277-0700
FRN: 006222319

Transferor:
Embarq Corporation  
100 CenturyLink Drive  
Monroe, Louisiana 71203  
(318) 388-9000
FRN: 0014-7911-64

Licensee:
Preferred Communications of Texas, LLC  
100 CenturyLink Drive  
Monroe, Louisiana 71203  
(318) 388-9000
FRN: 0030-1022-97

(a)(2) Jurisdiction of Organizations

Transferee: Securus Technologies, LLC is a Delaware limited liability company

Transferor: Embarq Corporation, is a Delaware corporation

Licensee: Preferred Communications of Texas, LLC, is a Delaware limited liability company
(a)(3) Correspondence concerning this Application should be sent to:

For Transferee:  
Michael Pryor  
Brownstein Hyatt Farber Schreck, LLP  
1155 F. Street NW  
Suite 1200  
Washington, DC 20004  
202 296 7353 (tel)  
202 296 7009 (fax)  
Mpryor@bhfs.com

For Transferor:  
Randy Clarke  
Lumen Technologies, Inc.  
1099 New York Ave. NW  
Suite 250  
Washington, D.C. 20001  
202 429 3116 (tel)  
Randy.Clarke@lumen.com

With a copy to:

Joshua Martin  
Senior Vice President and General Counsel, and Assistant Corporate Secretary  
Securus Technologies, LLC  
4000 International Parkway  
Carrollton, Texas 75007  
972.277.0300  
joshuamartin@securustechnologies.com

(a)(4) Ownership Information

Transferor/Licensee:

Preferred Communications of Texas, LLC is a wholly-owned subsidiary of Embarq Corporation, which is a wholly-owned subsidiary of Lumen Technologies, Inc.

Transferee:

Securus Technologies, LLC is a wholly-owned subsidiary of Aventiv Technologies, LLC, which is ultimately owned by Platinum Equity, LLC a global investment firm. Upon consummation of the proposed transaction, the following entities will hold, directly or indirectly, a ten percent or greater interest the Licensee. ¹⁶ Exhibit A provides diagrams of pre- and post-closing ownership structure of Preferred.

¹⁶ Unless otherwise indicated, the ownership interests provided herein represent both equity and voting interests.
The following entity will directly own 100 percent (100%) of the Licensee upon completion of the transaction:

Name: Securus Technologies, LLC (“Securus”)
Address: 4000 International Pkwy.
          Carrollton, TX 75007
Citizenship: U.S. (Delaware)
Principal Business: Telecommunications
% Interest: 100% (directly in Licensee)

The following persons or entities, which currently own or control a 10% or greater direct or indirect interest in Securus will, upon completion of the Transaction, own or control a 10% or greater indirect interest in the Licensee:

Name: Aventiv Technologies, LLC
Address: 4000 International Pkwy.
          Carrollton, TX 75007
Citizenship: U.S. (Delaware)
Principal Business: Holding Company
% Interest: 100% (indirectly as 100% owner of Securus)

Name: SCRS Acquisition Corporation
Address: c/o Platinum Equity, LLC
          360 North Crescent Drive
          South Building
          Beverly Hills, California 90210
Citizenship: U.S. (Delaware)
Principal Business: Holding Company
% Interest: 100% (indirectly as 100% owner of Aventiv)

Name: SCRS Intermediate Holding II Corporation (“SCRS Int-Holding II”)
Address: c/o Platinum Equity, LLC
          360 North Crescent Drive
          South Building
          Beverly Hills, California 90210
Citizenship: U.S. (Delaware)
Principal Business: Holding Company
% Interest: 100% (indirectly, as 100% owner of SCRS Acquisition Corporation)
<table>
<thead>
<tr>
<th>Name:</th>
<th>SCRS Intermediate Holding Corporation (&quot;SCRS Int-Holding&quot;)</th>
</tr>
</thead>
</table>
| Address: | c/o Platinum Equity, LLC  
360 North Crescent Drive  
South Building  
Beverly Hills, California 90210 |
| Citizenship: | U.S. (Delaware) |
| Principal Business: | Holding Company |
| % Interest: | 100% (indirectly, as 100% owner of SCRS Int-Holding II) |

<table>
<thead>
<tr>
<th>Name:</th>
<th>SCRS Holding Corporation (&quot;SCRS Parent&quot;)</th>
</tr>
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| Address: | c/o Platinum Equity, LLC  
360 North Crescent Drive  
South Building  
Beverly Hills, California 90210 |
| Citizenship: | U.S. (Delaware) |
| Principal Business: | Holding Company |
| % Interest: | 100% (indirectly, as 100% owner of SCRS Int-Holding) |

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<tr>
<th>Name:</th>
<th>Platinum Equity Capital Partners IV, L.P. (&quot;Fund IV&quot;)</th>
</tr>
</thead>
</table>
| Address: | c/o Platinum Equity, LLC  
360 North Crescent Drive  
South Building  
Beverly Hills, California 90210 |
| Citizenship: | U.S. (Delaware) |
| Principal Business: | Investments |
| % Interest: | Approx. 69.46% equity interest and 93% voting interest (indirectly, approximately 69.46% equity owner of SCRS Parent, with approximately 93% of the voting shares) |

No limited partner of Fund IV has a 10% or greater interest in SCRS Parent through Fund IV.

<table>
<thead>
<tr>
<th>Name:</th>
<th>Platinum Equity SCRS Co-Investors, LLC (&quot;SCRS Co-Investors&quot;)</th>
</tr>
</thead>
</table>
| Address: | 360 North Crescent Drive  
South Building  
Beverly Hills, California 90210 |
| Citizenship: | U.S. (Delaware) |
| Principal Business: | Investments |
| % Interest: | Approx. 20.75% equity only interest (indirectly, as approximately 20.75% equity owner of SCRS Parent) |

SCRS Co-Investors holds no voting shares of SCRS Parent and is a passive investment vehicle for co-investors. None of the co-investors own, directly or indirectly, 10% or more of the equity of the Licensee.
Name: Platinum Equity Partners IV, L.P. (“Fund IV GP”)
Address: c/o Platinum Equity, LLC
360 North Crescent Drive
South Building
Beverly Hills, California 90210
Citizenship: U.S. (Delaware)
Principal Business: Investments
% Interest: Approx. 69.46% (indirectly, as the general partner of Fund IV)

No limited partner of Fund IV GP has a 10% or greater interest in SCRS Parent through Fund IV GP.

Name: Platinum Equity Partners IV, LLC (“PEP IV LLC”)
Address: c/o Platinum Equity, LLC
360 North Crescent Drive
South Building
Beverly Hills, California 90210
Citizenship: U.S. (Delaware)
Principal Business: Investments
% Interest: Approx. 69.46% (indirectly, as the general partner of Fund IV GP)

The sole manager of PEP IV LLC is Tom Gores, a U.S. citizen who can be reached through Platinum Equity, LLC, 360 North Crescent Drive, South Building, Beverly Hills, California 90210.

Name: Platinum Equity Investment Holdings IV, LLC (“PEIH IV”)
Address: c/o Platinum Equity, LLC
360 North Crescent Drive
South Building
Beverly Hills, California 90210
Citizenship: U.S. (Delaware)
Principal Business: Investments
% Interest: Approx. 69.46% (indirectly, as the sole member of PEP IV LLC)
Name: Platinum Equity Investment Holdings IV Manager, LLC ("PEIH IV Manager")
Address: c/o Platinum Equity, LLC  
360 North Crescent Drive  
South Building  
Beverly Hills, California 90210  
Citizenship: U.S. (Delaware)  
Principal Business: Investments  
% Interest: Approx. 69.46% (indirectly, as the sole manager of PEIH IV)

The sole manager of PEIH IV Manager is Mary Ann Sigler, Chief Financial Officer of PE LLC.

Name: Platinum Equity, LLC ("PE LLC")  
Address: 360 North Crescent Drive  
South Building  
Beverly Hills, California 90210  
Citizenship: U.S. (Delaware)  
Principal Business: Investments  
% Interest: Approx. 69.46% (indirectly, as the sole member of PEIH IV)

The sole manager of PE LLC is Tom Gores. All the membership interests of PE LLC are held in trust by the Gores Trust dated January 26, 1999, as amended. Tom Gores and Holly Gores, U.S. citizens, are the trustees of the Gores Trust.

To the Transferee’s knowledge, no other person or entity, directly or indirectly, owns or controls a ten percent (10%) or greater interest in Transferee.

(a)(5) Certifications Pursuant to Sections 1.2001-1.2003

Applicants certify, pursuant to 47 C.F.R. §§ 1.2001-1.2003, that to the best of their knowledge, information and belief, no party to this application is subject to denial of federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 853.

(a)(6) Description of the Transaction

A description of the transaction is set forth in Section II above.
(a)(7) **Description of Geographic Areas in Which Telecommunications Services Are Provided**

Securus provides domestic interstate services as a part of its provision of inmate calling services and public payphone service to correctional facilities in the District of Columbia and all states except Delaware, Hawaii, and Vermont. No other affiliate of Securus provides telecommunications services.

Preferred is authorized to provide telecommunications service in Texas, which it does solely under the TDCJ Contract.

(a)(8) **Request for Streamlined Processing**

Applicants respectfully submit that this Application is eligible for streamlined processing pursuant to Sections 63.03 of the Commission’s Rules, 47 C.F.R. § 63.03. In particular, this Application is eligible for streamlined processing pursuant to Section 63.03(b)(2)(i) because, upon closing of the proposed transaction, Securus (and its affiliates), including Preferred: (i) will have a market share in the interstate, interexchange market of less than 10%, (ii) will provide competitive telephone exchange services or exchange access services (if at all) exclusively in geographic areas served by a dominant local exchange carrier that is not a party to the transaction, and (iii) not be dominant with respect to any service.

(a)(9) **Other Commission Applications Related to this Transaction**

No other related applications related to this transaction will be filed with the Commission.

(a)(10) **Special Consideration Requests**

The Applicants do not request special consideration because no party to the proposed transaction is facing imminent business failure.
(a)(11) **Waiver Requests**

No separately filed waiver requests are being sought in conjunction with this Joint Application.

(a)(12) **Statement showing how grant of the application will serve the public interest.**

A demonstration of how the proposed transaction will serve the public interest is set forth in section III above.

V. **CONCLUSION**

For the reasons stated above, the Applicants respectfully request that the Commission grant the Joint Application.
Respectfully submitted,

By: Embarq Corporation

/s/ Randy Clarke

Randy Clarke
Vice President Federal Regulatory Affairs
Craig J. Brown
Assistant General Counsel
1099 New York Avenue, N.W., Suite 250
Washington, DC 20001
202-429-3116
randy.clarke@lumen.com
craig.j.brown@lumen.com

Dated: June 24, 2021

Counsel for Transferee

Michael H. Pryor
Brownstein Hyatt Farber Schreck, LLP
1155 F Street N.W., Suite 1200
Washington, DC 20004
202-383-4706
mpryor@bhfs.com
EXHIBIT A

PRE- AND POST-CLOSING OWNERSHIP DIAGRAMS
Pre-Transaction Ownership Structure of Licensee

Lumen Technologies, Inc.

Embarq Corporation

Preferred Communications of Texas, LLC
Post-Transaction Ownership Structure of Licensee*1

* The entities listed herein only include SCRS and its subsidiaries that (1) hold authorization to provide intrastate, interstate, international or wireless telecommunications services or (2) are in the chain of ownership of those entities. The chart excludes subsidiaries of SCRS that do not hold authorization to provide telecommunications services in the United States.

1. All ownership is voting and equity unless indicated otherwise.
2. Platinum SCRS Principals, LLC is a co-investment vehicle comprised of Platinum employees and their friends and family.
3. Comprised of various management individuals of Securus.
4. Platinum Equity SCRS Co-Investors, LLC is a co-investment aggregator vehicle (the "Aggregator") that contributed co-investors' capital into SCRS Parent. The Aggregator holds no voting shares of SCRS Parent and is a passive investment vehicle for co-investors. None of the co-investors (i.e., members of the Aggregator) own 10% or more of the equity of the licensee on a look-through aggregate basis. The Senior Managing Member of the Aggregator is Platinum Equity Partners IV, L.P.
Post-Transaction Ownership Structure of Licensee (continued)

Gores Trust dated January 26, 1999, as amended

Platinum Equity, LLC

Platinum Equity Investment Holdings IV Manager, LLC

Platinum Equity Investment Holdings IV, LLC

Platinum Equity Partners IV, LLC

Platinum Equity Partners IV, L.P.

Platinum Equity Capital Partners IV, L.P. (Delaware) ("Fund IV")

Co-Trustees: Tom Gores & Holly Gores

Sole Manager: Tom Gores

Sole Manager: Mary Ann Sigler

Sole Manager: Tom Gores

Sole Manager: Tom Gores

Sole Manager: Tom Gores

Sole Manager: Tom Gores

Sole Manager: Tom Gores

Unless indicated all ownership percentages are 100%.
VERIFICATIONS
VERIFICATION

I, Joshua Martin, state that I am Senior Vice President and General Counsel of Securus Technologies, LLC ("the Company"); that I am authorized to make this Verification on behalf of the Company; that the foregoing filing was prepared under my direction and supervision; and that the contents thereof and the certifications contained therein regarding the Company and its affiliates, are true and correct to the best of my knowledge, information and belief.

I declare under penalty of perjury that the forgoing is true and correct. Executed this 23rd day of June 2021.

Joshua Martin
Senior Vice President and General Counsel
Securus Technologies, LLC
VERIFICATION

I, Craig J. Brown, state that I am Assistant General Counsel of Lumen Technologies, LLC, which wholly owns Preferred Communications of Texas, LLC ("the Company"); that I am authorized to make this Verification on behalf of the Company; that the foregoing filing was prepared under my direction and supervision; and that the contents thereof and the certifications contained therein regarding the Company and its affiliates, are true and correct to the best of my knowledge, information and belief.

I declare under penalty of perjury that the forgoing is true and correct. Executed this 23rd day of June 2021.

Craig J. Brown
Assistant General Counsel
Lumen Technologies, Inc.