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*ADMITTED IN DC ONLY

June 30, 2017

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 Annual Report and Certification

Dear Secretary Dortch:

Global Tel*Link Corporation ("GTL"),[1] by its attorneys, respectfully submits its Annual Report and Certification for calendar year 2016. As required by the Commission's Public Notice,[2] GTL provides its Annual Report and Certification in accordance with the requirements of the *Protective Order* previously adopted in this proceeding.[3] 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.

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1 The 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, LLC, Public Communications Services, Inc., and Value-Added Communications, Inc.

2 WC Docket No. 12-375, *Wireline Competition Bureau Informs Providers of Inmate Calling Services that They May File Their Annual Reports Pursuant to Existing Protective Order*, DA 17-508, Public Notice (rel. May 24, 2017).

3 *Rates for Interstate Inmate Calling Services*, 28 FCC Rcd 16954 (2013) ("*Protective Order*").

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 Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, and the Commission's implementing rules."[4] 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."[5]

FOIA specifically exempts from disclosure "trade secrets and commercial or financial information obtained from a person and privileged or confidential" information.[6] Similarly, the Commission's rules state that such information is not routinely available for public inspection.[7] 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."[8]

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."[9] 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.[10] The Commission has held "revenue information to be the type of competitively sensitive material that should be withheld under" FOIA.[11] The Commission also has found financial information should be withheld from disclosure "because this material is competitively sensitive and therefore confidential" under FOIA.[12] 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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4 *Protective Order* ¶ 2.

5 *Protective Order* ¶ 3 (citing 47 C.F.R. §§ 0.459(a), 0.459(a)(3)).

6 5 U.S.C. § 552(b)(4).

7 47 C.F.R. § 0.457(d).

8 47 C.F.R. §§ 0.459(b)(3), 0.459(b)(5).

9 *Josh Wein, Warren Communications News on Request for Inspection of Records*, 24 FCC Rcd 12347, ¶ 13 (2009).

10 *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).

11 *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).

12 *Sandwich Isles Communications, Inc. on Request for Inspection of Records*, 28 FCC Rcd 15253, ¶ 7 (2013).

REDACTED - FOR PUBLIC INSPECTION

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

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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

1. Provider Name: Global Tel*Link Corporation**	**2. Reporting Period:** 2016
3. Officer Name, Title: Charles Stephen Yow, Chief Financial Officer	
4. Officer Telephone Number: 251-338-8877	**5. Officer E-Mail Address:** Steve.Yow@gtl.net
6. Total Number of Correctional Facilities Served by Provider: [redacted]	
7. Number of Prisons Served by Provider: [redacted]	
8. Number of Jails Served by Provider with Average Daily Population (ADP) of 0-350: [redacted]	
9. Number of Jails Served by Provider with ADP of 350-999: [redacted]	
10. Number of Jails Served by Provider with ADP of 1000 or more: [redacted]	

** This Annual 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, LLC, Public Communications Services, Inc., and Value-Added Communications, Inc.

II. ICS Rates

[redacted]

II. ICS Rates

[redacted]

REDACTED - FOR PUBLIC INSPECTION

II. ICS Rates

[redacted]

REDACTED - FOR PUBLIC INSPECTION

II. ICS Rates

[redacted]

REDACTED - FOR PUBLIC INSPECTION

II. ICS Rates

[redacted]

REDACTED - FOR PUBLIC INSPECTION

II. ICS Rates

[redacted]

REDACTED - FOR PUBLIC INSPECTION

II. ICS Rates

[redacted]

II. ICS Rates

[redacted]							

REDACTED - FOR PUBLIC INSPECTION

II. ICS Rates

[redacted]

REDACTED - FOR PUBLIC INSPECTION

II.(a).

[redacted]

II.(a).

[redacted]

II.(a).

[redacted]

III. Ancillary Service Charges

[redacted]

III. Ancillary Service Charges

[redacted]

III. Ancillary Service Charges

[redacted]

III. Ancillary Service Charges

[redacted]

III. Ancillary Service Charges

[redacted]

III. Ancillary Service Charges

[redacted]

IV. Variable Site Commission Payments

[redacted]

IV. Variable Site Commission Payments

[redacted]

IV. Variable Site Commission Payments

[redacted]			

IV. Variable Site Commission Payments

[redacted]			

IV. Variable Site Commission Payments

[redacted]

IV. Variable Site Commission Payments

[redacted]			

IV. Variable Site Commission Payments

[redacted]			

IV. Variable Site Commission Payments

[redacted]

IV. Variable Site Commission Payments

[redacted]			

V. Fixed Site Commission

[redacted]			

V. Fixed Site Commission

[redacted]			

V. Fixed Site Commission

[redacted]			

V. Fixed Site Commission

[redacted]			

V. Fixed Site Commission

[redacted]			

V. Fixed Site Commission

[redacted]			

V. Fixed Site Commission

[redacted]			

V. Fixed Site Commission

[redacted]			

V. Fixed Site Commission

[redacted]			

Explanatory Notes

[redacted]

Approved by OMB June 30, 2017
OMB Control Number 3060-1322
WC Docket No. 12-375

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)

1. Name of Service Provider Global Tel*Link Corporation**	**2. Reporting Year** 2016
3. Officer Name, Title Charles Stephen Yow, Chief Financial Officer	
4. Mailing Address of Officer **Street Address** 12021 Sunset Hills Road, Suite 100	
City Reston, VA 20190	**State** / **Zip Code**
5. Telephone Number 251-338-8877	
6. Email Address 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.

9. Signature of Authorized Person Charles Stephen Yow	**10. Date** 6/30/2017
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, LLC, Public Communications Services, Inc., and Value-Added Communications, Inc.

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