

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

In the Matter of )  
 )  
Rates for Interstate Inmate Calling Services ) WC Docket No. 12-375  
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\_\_\_\_\_ )

**GLOBAL TEL\*LINK CORPORATION  
OBJECTION TO DISCLOSURE OF CONFIDENTIAL INFORMATION**

Global Tel\*Link Corporation (“GTL”),<sup>1</sup> by its attorneys, hereby objects to the request of Securus Technologies, Inc. (“Securus”) to have the confidential version of GTL’s response to the Commission’s one-time mandatory data collection (hereinafter “Data Response”)<sup>2</sup> provided to Securus’ outside consultant FTI Consulting, Inc. (“FTI”).

**BACKGROUND**

Under the *Protective Order*<sup>3</sup> adopted by the Commission for this proceeding,<sup>4</sup> “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.”<sup>5</sup> FOIA specifically exempts from disclosure “trade secrets and commercial or financial information obtained from a

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

<sup>2</sup> GTL filed its initial data responses on August 22, 2014, and supplemented those responses on September 29, 2014. This Objection applies to both its initial and supplemental data responses (collectively, “Data Response”).

<sup>3</sup> *Rates for Interstate Inmate Calling Services*, 28 FCC Rcd 16954, ¶ 2 (2013) (“*Protective Order*”).

<sup>4</sup> *Rates for Interstate Inmate Calling Services*, 28 FCC Rcd 14107 (2013) (“*Inmate Calling Report and Order and FNPRM*”), *pets. for stay granted in part sub nom. Securus Tech., Inc. v. FCC*, No. 13-1280 (D.C. Cir. Jan.13, 2014) (“*Partial Stay Order*”), *pets. for review pending sub nom. Securus Tech., Inc. v. FCC*, No. 13-1280 (D.C. Cir. filed Nov. 14, 2013) (and consolidated cases).

<sup>5</sup> *Protective Order* ¶ 2. 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.” *Protective Order* ¶ 3 (citing 47 C.F.R. §§ 0.459(a), 0.459(a)(3)).

person and privileged or confidential.”<sup>6</sup> Similarly, the Commission’s rules state that such information is not routinely available for public inspection.<sup>7</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>8</sup>

In the confidential version of its Data Response, GTL designated the following information as Confidential Information pursuant to the *Protective Order*: its costs of providing inmate calling services (“ICS”), revenue-producing minutes of use, costs associated with ancillary services and fees, and portions of its Description & Justification prepared by Economists, Inc. GTL already has demonstrated why its confidential Data Response should be protected from public disclosure and disclosure to its competitors and their outside counsel.<sup>9</sup>

On October 23, 2014, Securus requested the confidential cost data filed by all ICS providers in response to the Commission’s one-time mandatory data collection.<sup>10</sup> Securus requested that each ICS provider send its confidential filings to FTI, its outside consultant. Securus correctly recognized that the confidential data responses filed by ICS providers should be shared only with ICS providers’ outside consultants, and not with ICS providers’ in-house personnel or outside counsel.<sup>11</sup> Generally, GTL would have no objection to providing its confidential Data Response to an outside consultant, as demonstrated by GTL’s willingness to

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<sup>6</sup> 5 U.S.C. § 552(b)(4).

<sup>7</sup> 47 C.F.R. § 0.457(d).

<sup>8</sup> 47 C.F.R. §§ 0.459(b)(3), 0.459(b)(5).

<sup>9</sup> See, e.g., WC Docket No. 12-375, Global Tel\*Link Corporation Objection to Disclosure of Confidential Information (filed Sept. 12, 2014); WC Docket No. 12-375, Letter from Chérie R. Kiser, Counsel to GTL, to Marlene H. Dortch (filed Oct. 6, 2014).

<sup>10</sup> WC Docket No. 12-375, Letter from Stephanie A. Joyce, Counsel to Securus, to Marlene H. Dortch (dated Oct. 23, 2014) (“Securus Request”). Pursuant to the requirements of the *Protective Order*, GTL files this Objection within three (3) business days of receiving the Securus Request.

<sup>11</sup> Securus Request at 1.

provide its confidential Data Response to Don Wood.<sup>12</sup> As explained herein, however, GTL objects to providing its confidential Data Response to FTI due to GTL's relationship with FTI.

## ARGUMENT

### **I. GTL AGREES THAT CONFIDENTIAL DATA SHOULD BE PROVIDED ONLY TO OUTSIDE CONSULTANTS, BUT OBJECTS TO RELEASE OF ITS CONFIDENTIAL DATA TO FTI**

#### **A. GTL Objects to FTI Accessing Its Confidential Data Response**

An ICS provider's confidential data should be given only to outside consultants, not to ICS providers' in-house personnel and counsel or outside counsel. GTL, however, objects to providing its confidential Data Response to FTI due to a conflict of interest contract dispute between GTL and FTI. As explained in the attached Declaration, GTL engaged FTI to provide certain cost study support to GTL in connection with the FCC's ongoing ICS proceeding.<sup>13</sup> The agreement between GTL and FTI specified that FTI would not accept any other engagement that conflicts with its provision of services to GTL without GTL's prior written consent. Subsequently, FTI entered into an agreement with, and provided services to, Securus relating to the ICS proceeding, which GTL learned about via Securus' public filings with the Commission. As such, GTL has an ongoing dispute with FTI, and GTL is considering its options with respect to its agreement with FTI. In light of this situation, GTL has significant concerns about providing its confidential Data Response to FTI. As the Commission has recognized, it is appropriate to "exclude persons whose activities on behalf of their clients would place them in a situation where their obligations under a protective order are likely to be put at risk, even if

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<sup>12</sup> GTL also has provided its confidential Data Response to outside counsel for the Wright Petitioners and their outside consultant, Mr. Coleman Bazelon of the Brattle Group.

<sup>13</sup> The Declaration of David Silverman is attached hereto.

unintentionally or unconsciously.”<sup>14</sup> GTL strongly objects to allowing FTI to review its confidential Data Response.

**B. ICS Providers Should Continue the Practice Started in 2008 for Giving Designated Consultants Access to Confidential Data**

Securus correctly recognizes that confidential data should not be provided to ICS providers’ in-house personnel and counsel or outside counsel.<sup>15</sup> While the *Protective Order* is intended to protect confidential information from disclosure to the general public, GTL continues to have significant concerns about the disclosure of its confidential information to in-house personnel and counsel or outside counsel for its competitors even under the safeguards afforded by the *Protective Order*.<sup>16</sup>

The Commission previously has found financial information and corporate operating expenses should be withheld from disclosure “because this material is competitively sensitive and therefore confidential” under FOIA.<sup>17</sup> Similarly, the Commission consistently has held “revenue information to be the type of competitively sensitive material that should be withheld under” FOIA.<sup>18</sup> Information concerning “business operations and plans” also has been withheld because disclosure could damage a company’s “competitive position by giving the competitors

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<sup>14</sup> MB Docket No. 14-57, *et al.*, *Applications of Comcast and Time Warner Cable Inc. for Consent to Assign or Transfer Control of Licenses and Authorizations, et al.*, Order, DA 14-1463, ¶ 8 (rel. Oct. 7, 2014) (“*Comcast/TWC Order*”).

<sup>15</sup> Securus Request at 1.

<sup>16</sup> *Qwest Commc’ns Int’l Inc. v. FCC*, 229 F.3d 1172, 1184 (D.C. Cir. 2000) (“A response that the protective order adequately protects Qwest against competitive injury misses the mark. The Commission must explain why only the release of raw audit data will achieve meaningful public comment.”).

<sup>17</sup> *Sandwich Isles Communications, Inc. on Request for Inspection of Records*, 28 FCC Rcd 15253, ¶ 7 (2013).

<sup>18</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).

insight into [the company]’s business methods and strategies.”<sup>19</sup> Disclosure also “would help rivals to identify and exploit [GTL’s] competitive weaknesses.”<sup>20</sup>

The cost support data of the kind found in GTL’s Data Response, including “disaggregated cost data” that “have the potential of revealing [a company]’s market plans and positions” or “provide insight into [a company]’s business strategies,” also has been deemed exempt from mandatory public disclosure.<sup>21</sup> Access to GTL’s confidential cost data, “when combined with other publicly available information, would enable competitors to estimate [GTL’s] revenues for specific product families, particular companies, and geographic areas, giving competitors a substantial competitive advantage.”<sup>22</sup> The Commission consistently has afforded “disaggregated customer data, detailed financial data or current or forward-looking business strategies or plans” a higher level of confidentiality than other information,<sup>23</sup> even when a protective order is in place.<sup>24</sup>

The ICS providers participating in this proceeding previously recognized the potential harm of sharing confidential data with competitors. In 2008, numerous ICS providers worked together to provide cost information to the Commission.<sup>25</sup> As part of that process, the ICS

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<sup>19</sup> *Josh Wein, Warren Communications News on Request for Inspection of Records*, 24 FCC Rcd 12347, ¶ 13 (2009); see also *National Parks & Cons. Ass’n v. Kleppe*, 547 F.2d 673, 684 (D.C. Cir. 1976) (finding that business strategies or marketing plans that would enable competitors to devise counter-strategies are competitively sensitive materials within the meaning of Exception 4 of FOIA).

<sup>20</sup> *Baker & Hostetler LLP v. U.S. Dep’t of Commerce*, 473 F.3d 312, 320 (D.C. Cir. 2006) (citing *Critical Mass Energy Project v. Nuclear Regulatory Comm’n*, 830 F.2d 278, 281 (D.C. Cir. 1987) and *Pub. Citizen Health Research Group*, 704 F.2d 1280, 1290 (D.C. Cir. 1983)).

<sup>21</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>22</sup> *Wall* ¶ 3 (citing *Lakin* ¶ 6).

<sup>23</sup> *Pantelis Michalopoulos, Esquire, Christopher Bjornson, Esquire*, 25 FCC Rcd 7479, 2 (2010).

<sup>24</sup> *Randy H. Herschaft, Associated Press on Requests for Inspection of Records*, 22 FCC Rcd 5880, ¶ 24 (2007).

<sup>25</sup> *Inmate Calling Report and Order and FNPRM* ¶ 9; see also CC Docket No. 96-128, Don J. Wood, Inmate Calling Services Interstate Call Cost Study (filed Aug. 15, 2008); CC Docket No. 96-128, Letter from Stephanie A.

providers agreed that each carrier would provide their individual company data to Don Wood, but the data would not be shared among the ICS providers, and the individual company data would remain proprietary and confidential to each company.<sup>26</sup> Each company provided their confidential data directly to Mr. Wood, who agreed that no company-specific information would be provided to anyone at any time. Maintaining the practice first established in 2008 would alleviate many of the concerns that have been raised in this proceeding regarding competitor access to data.<sup>27</sup> Mr. Wood currently has access to the confidential data of Pay Tel, GTL, Securus, and Telmate (and possibly other ICS providers), and can analyze that data as necessary for all parties.

## **II. ACCESS TO GTL'S RAW COST DATA IS NOT NECESSARY TO PARTICIPATE IN THIS PROCEEDING**

Access to GTL's confidential Data Response is not required for participation in this proceeding. Through the public version of GTL's Data Response, parties have access to the methodology used by Economists, Inc. as well as GTL's overall cost per minute to provide inmate calling services. Interested parties have all the information they need to comment on GTL's Data Response or make proposals in this proceeding based on GTL's Data Response, without accessing GTL's confidential and proprietary data. The Commission no longer proposes

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Joyce, Counsel to Securus Technologies, Inc., to Marlene H. Dortch (filed Aug. 22, 2008) (attaching supplemental cost and usage data); CC Docket No. 96-128, Record submission by "several providers of inmate telephone service," (filed Oct. 15, 2008) (amending supplemental cost and usage data).

<sup>26</sup> See Attachment 1 (providing the correspondence between the ICS providers regarding their agreement).

<sup>27</sup> GTL, Securus, and Telmate have objected to providing their confidential data to outside counsel for one of their competitors. See, e.g., WC Docket No. 12-375, Securus Technologies, Inc. Objection to Disclosure of Confidential Information (filed July 17, 2014); WC Docket No. 12-375, Global Tel\*Link Corporation Objection to Disclosure of Confidential Information (filed Sept. 12, 2014); WC Docket No. 12-375, Telmate, LLC Objection to Disclosure of Confidential Information (Sept. 12, 2014); WC Docket No. 12-375, Letter from Chérie R. Kiser, Counsel to GTL, to Marlene H. Dortch (filed Oct. 6, 2014).

to establish cost-based rates for ICS calls,<sup>28</sup> and thus access to GTL's underlying, raw cost data is not necessary. As the Commission previously has said, the "need for cost data for the purposes of price caps has been significantly decreased."<sup>29</sup> Accordingly, the release of GTL's "raw" data is not necessary "to achieve meaningful public comment."<sup>30</sup>

### **III. THE *PROTECTIVE ORDER* SHOULD BE MODIFIED TO ADDRESS COMPETITIVE CONCERNS**

The *Protective Order* does not accomplish the objective of ensuring that highly confidential sensitive commercial information is not used by ICS providers to the detriment of their competitors. The *Protective Order* should be modified to ensure that the interests of all ICS providers are adequately protected. In other proceedings, the Commission has created different levels of confidential information, and has allowed parties to designate certain information as "Highly Confidential Information."<sup>31</sup> In those cases, the governing protective order imposed additional procedures for access to Highly Confidential Information. GTL recommends that the same process be applied in this proceeding so that information designated as "Highly Confidential Information" can only be accessed by individuals that are not competitors to the submitting party, including a competitor's in-house personnel and counsel or outside counsel. Confidential data can easily be used by in-house personnel and counsel or outside counsel to provide "advice about . . . relevant business decisions," which is the type of competitive

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<sup>28</sup> WC Docket No. 12-375, *Rates for Interstate Inmate Calling Services*, Second Further Notice of Proposed Rulemaking, FCC 14-158, ¶ 48 (rel. Oct. 22, 2014).

<sup>29</sup> *AT&T Cost Assignment Forbearance Order*, 23 FCC Rcd 7302, ¶ 19 (2008).

<sup>30</sup> *Qwest Commc'ns Int'l Inc. v. FCC*, 229 F.3d 1172, 1184 (D.C. Cir. 2000).

<sup>31</sup> See, e.g. MB Docket No. 14-57, *Applications of Comcast Corp. and Time Warner Cable Inc. for Consent to Assign or Transfer Control of Licenses and Authorizations*, Modified Joint Protective Order, DA 14-1464 (rel. Oct. 7, 2014) (establishing two levels of confidentiality, one for "Confidential Information" and one for "Highly Confidential Information," and establishing separate procedures for accessing Highly Confidential Information).

decision-making prohibited under the *Protective Order*.<sup>32</sup> Thus, it is appropriate to “exclude persons whose activities on behalf of their clients would place them in a situation where their obligations under a protective order are likely to be put at risk, even if unintentionally or unconsciously.”<sup>33</sup>

### **CONCLUSION**

For the foregoing reasons, GTL respectfully requests that the Commission limit access to the confidential version of GTL’s Data Response, and specifically, not permit FTI to obtain access to GTL’s confidential data.

Respectfully submitted,

**GLOBAL TEL\*LINK CORPORATION**

David Silverman  
Senior Vice President and General Counsel  
GLOBAL TEL\*LINK CORPORATION  
12021 Sunset Hills Road  
Suite 100  
Reston, VA 20190  
(703) 955-3886  
david.silverman@gtl.net

*/s/ Chérie R. Kiser*

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Chérie R. Kiser  
Angela F. Collins  
CAHILL GORDON & REINDEL LLP  
1990 K Street, NW, Suite 950  
Washington, DC 20006  
(202) 862-8900  
ckiser@cahill.com  
acollins@cahill.com

Dated: October 28, 2014

Its Attorneys

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<sup>32</sup> *Protective Order* at 1 (defining “Competitive Decision-Making”).

<sup>33</sup> *Comcast/TWC Order* ¶ 8.

**Before the  
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In the Matter of )  
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**DECLARATION OF DAVID SILVERMAN  
IN SUPPORT OF OBJECTION TO DISCLOSURE OF CONFIDENTIAL  
INFORMATION**

I, David Silverman, state as follows:

1. I am the Senior Vice President and General Counsel for Global Tel\*Link Corporation (“GTL”). I also serve as Senior Vice President and General Counsel of Public Communications Services, Inc. (“PCS”) and Value-Added Communications, Inc. (“VAC”).

2. On January 8, 2014, GTL and FTI Consulting, Inc. (“FTI”) entered into an Engagement Contract to assist GTL with preparation of cost study data for the inmate calling services (“ICS”) proceeding before the Federal Communications Commission (“FCC”). The Engagement Contract is designated as “Private and Confidential.” Thus, I will summarize the provisions herein without providing a copy of the contract.

3. The Engagement Contract contains a “Conflicts of Interest” provision in which FTI represented to GTL that it had no conflicts of interest or additional relationships that would preclude FTI from providing services under the Engagement Contract. That provision also prohibits FTI from accepting an engagement that conflicts with its engagement with GTL without receiving prior written consent from GTL.

4. In its routine review of filings made with the FCC, GTL learned that Securus had retained FTI to assist Securus in preparing cost study information in connection with the FCC's ongoing ICS proceeding.

5. GTL has an ongoing dispute with FTI regarding its obligations to GTL under the parties' Engagement Contract for which GTL is considering its options.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

*/s/ David Silverman*

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David Silverman

Executed on October 28, 2014.

# ATTACHMENT 1

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**From:** Curtis Hopfinger <CHopfinger@securustech.net>  
**Sent:** Monday, June 23, 2008 6:38 PM  
**To:** David S. Cotton; Vince Townsend; Dorothy Cukier; Alison Maker-PCS  
**Cc:** Don Wood  
**Subject:** FCC Interstate Cost Project

Hi all,

This is to memorialize our agreement regarding the preparation of "industry" costs for Interstate calls which will be presented to the FCC.

- We have retained Don Wood to prepare the costs and documentation for the FCC.
- Don will prepare a "template" of the cost data that he will need from each company. This will be distribute to each company.
- Each participating company will provide the requested information directly to Don and it will be marked "Proprietary & Confidential".
- Individual company data will not be shared among the coalition members and the company data will remain Proprietary & Confidential to each company.
- Don will use the individual company data to roll-up, or aggregate, to an Industry level cost.
- If Don has questions about individual company data, he will contact that company directly.
- The aggregated cost information will be provided to the FCC and will be public. However, the underlying company data will remain confidential.
- We will seek a Protective Order from the FCC should Don need to provide specific company data.
- We will work with Don to complete this task in a reasonable time frame. (We are approaching the FCC and asking for 45 days but we don't know if that will be acceptable)
- The cost of Don's work is roughly estimated at \$20,000 to \$25,000 and is subject to change if the scope of the project increases or decreases.
- The coalition members agree to share in Mr. Wood's fees (sharing percentages not yet determined). We will also investigate Don's fees being considered a ASCP "Association" project.

If anyone feels I have mischaracterized our conversation and agreement, please let me know.

***Curt Hopfinger***

Director-Regulatory and Government Affairs  
Securus Technologies, Inc.  
14651 Dallas Pkwy, 6th Floor  
Dallas, TX 75254  
972-277-0319  
972-277-0416 (Fax)

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**From:** Don Wood <don.wood@mail.woodandwood.net>  
**Sent:** Wednesday, June 25, 2008 4:49 PM  
**To:** Curtis Hopfinger; vtownsend@paytel.com; David S Cotton; Dorothy Cukier; Alison Maker  
**Cc:** Tim Smith; areeves@paytel.com  
**Subject:** Updated template - please take note  
**Attachments:** cost input template 062508a.xls

**Importance:** High

My apologies, in my rush to get this out I omitted a category of costs from the prior version.

This basic template may not reflect the various ways that records are kept. Rather than try to anticipate every possibility, I am putting this out in a more general form. Please have company representatives contact me directly (by email or at either of the numbers below) if they have any questions. I don't want to have people get caught up in producing information in a specific way - if company representatives will let me know how they normally track this information, we may be able to work out a way for them to provide something I can work with that is consistent with internal recordkeeping.

Again, PLEASE ASSURE YOUR RESPECTIVE COMPANY REPRESENTATIVES THAT ALL INFORMATION WILL BE HELD BY MY FIRM AS CONFIDENTIAL. NO COMPANY-SPECIFIC INFORMATION WILL BE PRODUCED TO ANYONE AT ANY TIME, AND ALL COMPANY-SPECIFIC INFORMATION WILL BE DESTROYED AT THE END OF THIS PROCESS.

Don J. Wood  
WOOD & WOOD  
30000 Mill Creek Ave., Suite 395  
Alpharetta, Georgia 30022  
770.475.9971, x201 (office)  
678.429.4747 (mobile)

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**From:** Curtis Hopfinger <CHopfinger@securustech.net>  
**Sent:** Wednesday, July 02, 2008 12:24 PM  
**To:** Dorothy Cukier  
**Subject:** RE: Filing Ex Parte and Next Tuesday Call

Dorothy,

We do not have a written "contract" with Don. All we have as an "agreement" are Don's e-mails and calls, which were with the whole group. I have no individual agreement with Don. I did make the initial call to Don and requested his help and estimated costs, but after that initial call all correspondence with Don has been with the group. Obviously, the submission of the proprietary, individual company cost data was not shared

I am sure that Don can answer David's questions.

Curt H.

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**From:** Dorothy Cukier [<mailto:Dorothy.Cukier@gtl.net>]  
**Sent:** Wednesday, July 02, 2008 10:44 AM  
**To:** Curtis Hopfinger  
**Subject:** RE: Filing Ex Parte and Next Tuesday Call

Curt,

David would like to speak to Don about participating. He has also asked for a copy of the agreement provided to Don. Do you have that?

Do you have contact info for Don so David can give him a call?

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**From:** Curtis Hopfinger [<mailto:CHopfinger@securustech.net>]  
**Sent:** Wednesday, July 02, 2008 11:14 AM  
**To:** David S. Cotton; Dorothy Cukier; Alison Maker; [vtownsend@paytel.com](mailto:vtownsend@paytel.com); [MTRATHEN@brookspierce.com](mailto:MTRATHEN@brookspierce.com); [jeffrey.s.lanning@embarq.com](mailto:jeffrey.s.lanning@embarq.com); [amy@mehlmaninc.com](mailto:amy@mehlmaninc.com); Joyce, Stephanie; Don Wood  
**Subject:** Filing Ex Parte and Next Tuesday Call  
**Importance:** High

Hi all,

Thanks to all that attended yesterday's meeting and to David for all your help organizing.

As agreed yesterday we will have a call next Tuesday. On Tuesday's call we need to confirm which companies will participate in providing Don cost data and to set a time frame to provide the final product to the FCC. Yesterday, there was a brief discussion regarding a Protective order, we can finalize those plans on the call. Call details:

Tuesday - July 8th

11:00 a.m Eastern, 10:00 a.m. Central, 9:00 a.m Mountain, 8:00 a.m Pacific

Call-in number: 1-800-393-0640 Access Code: 913489

David will be forwarding this information to other companies that wish to participate in the industry study.

Also, attached is a draft Ex Parte that Stephanie prepared for yesterday's meeting. Please review to assure all names and titles are correct. Also, please remember that we were asked to file something next week with the time frame to complete the study. If we want to expand on yesterday's meeting, the filing with time frames may be an appropriate opportunity.

Please review the Ex Parte and provide and comments / corrections to Stephanie so we can get this filed.

Thanks

***Curt Hopfinger***

Director-Regulatory and Government Affairs

Securus Technologies, Inc.

14651 Dallas Pkwy, 6th Floor

Dallas, TX 75254

972-277-0319

972-277-0416 (Fax)

**CERTIFICATE OF SERVICE**

I hereby certify that, on this 28th day of October, 2014, I served a copy of the foregoing  
Global Tel\*Link Corporation Objection to Disclosure of Confidential Information on the  
following via the method indicated:

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

Stephanie A. Joyce  
Counsel for Securus Technologies, Inc.  
Arent Fox  
1050 Connecticut Avenue, NW  
Washington, DC 20036  
joyce.stephanie@arentfox.com  
***Via U.S. Mail and Electronic Mail***

Lynne Engledow  
Acting Deputy Chief  
Pricing Policy Division, Wireline Competition Bureau  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554  
lynne.engledow@fcc.gov  
***Via Electronic Mail***

*/s/ Angela F. Collins*