

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

FLOYD ABRAMS  
L. HOWARD ADAMS  
ROBERT A. ALESSI  
HELENE R. BANKS  
ANIRUDH BANSAL  
LANDIS C. BEST  
SUSAN BUCKLEY  
KEVIN J. BURKE  
JAMES J. CLARK  
BENJAMIN J. COHEN  
SEAN M. DAVIS  
STUART G. DOWNING  
ADAM M. DWORKIN  
ANASTASIA EFIMOVA  
JENNIFER B. EZRING  
JOAN MURTAGH FRANKEL  
JONATHAN J. FRANKEL  
BART FRIEDMAN

CIRO A. GAMBONI  
WILLIAM B. GANNETT  
CHARLES A. GILMAN  
STEPHEN A. GREENE  
JASON M. HALL  
WILLIAM M. HARTNETT  
CRAIG M. HOROWITZ  
DOUGLAS S. HOROWITZ  
TIMOTHY B. HOWELL  
DAVID G. JANUSZEWSKI  
ELAI KATZ  
THOMAS J. KAVALER  
BRIAN S. KELLEHER  
DAVID N. KELLEY  
CHÉRIE R. KISER\*  
EDWARD P. KRUGMAN  
JOEL KURTZBERG  
ALIZA R. LEVINE

TELEPHONE: (212) 701-3000  
FACSIMILE: (212) 269-5420

1990 K STREET, N.W.  
WASHINGTON, DC 20006-1181  
(202) 862-8900  
FAX: (202) 862-8958

AUGUSTINE HOUSE  
6A AUSTIN FRIARS  
LONDON, ENGLAND EC2N 2HA  
(011) 44.20.7920.9800  
FAX: (011) 44.20.7920.9825

WRITER'S DIRECT NUMBER

202-862-8950  
ckiser@cahill.com

JOEL H. LEVITIN  
GEOFFREY E. LIEBMANN  
ANN S. MAKICH  
JONATHAN I. MARK  
BRIAN T. MARKLEY  
WILLIAM J. MILLER  
NOAH B. NEWITZ  
MICHAEL J. OHLER  
ATHY A. O'KEEFFE  
DAVID R. OWEN  
JOHN PAPACHRISTOS  
LUIS R. PENALVER  
KIMBERLY PETILLO-DÉCOSSARD  
DEAN RINGEL  
JAMES ROBINSON  
THORN ROSENTHAL  
TAMMY L. ROY  
JONATHAN A. SCHAFFZIN

JOHN SCHUSTER  
MICHAEL A. SHERMAN  
DARREN SILVER  
HOWARD G. SLOANE  
JOSIAH M. SLOTNICK  
RICHARD A. STIEGLITZ JR.  
SUSANNA M. SUH  
ANTHONY K. TAMA  
JONATHAN D. THIER  
JOHN A. TRIPODORO  
GLENN J. WALDRIP, JR.  
HERBERT S. WASHER  
MICHAEL B. WEISS  
S. PENNY WINDLE  
DAVID WISHENGRAD  
COREY WRIGHT  
DANIEL J. ZUBKOFF  
ADAM ZUROFSKY

\*ADMITTED IN DC ONLY

November 12, 2014

Via ECFS

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

**Re: WC Docket No. 12-375  
Global Tel\*Link Corporation Second Request for Confidential Cost Data**

Dear Secretary Dortch:

Global Tel\*Link Corporation (“GTL”),<sup>1</sup> by its attorneys, hereby makes this second request for the confidential cost data submitted by ATN, Inc. and Correct Solutions, LLC in compliance with the Mandatory Data Collection. On October 29, 2014, GTL requested that all inmate calling services (“ICS”) providers that submitted confidential cost data in the above-referenced proceeding provide the confidential data to Economists Incorporated (“EI”). As previously explained, GTL and its counsel do not wish to see or receive the confidential cost data.

<sup>1</sup> This request 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.

Under the Commission's Protective Order issued December 19, 2013,<sup>2</sup> it is contemplated that confidential information will be provided within five (5) business days of such requests. The *Protective Order* further provides that any objections must be filed within three (3) business days of such requests.<sup>3</sup> As no parties submitted objections to GTL's request, all parties served with GTL's first request must comply. It has been fourteen (14) days since GTL issued its request. GTL hereby makes its second request for ATN, Inc. and Correct Solutions, LLC to send their confidential cost data by Friday, November 12, 2014, to EI at the address below. Failure to timely respond to this request is a violation of the Commission's *Protective Order*.<sup>4</sup>

Steve Siwek  
Principal  
Economists Incorporated  
2121 K St. NW, Suite 1100  
Washington, DC 20037  
202-223-4700 (telephone)

Mr. Siwek and all other individuals at EI who will be working with the data have executed the Acknowledgment of Confidentiality forms as required by the *Protective Order*. Acknowledgment Forms have been executed by Steve Siwek, Chris Holt, Elise Gurney and Alexandra Crafton. No EI personnel are GTL employees, and no EI personnel participate in Competitive Decision-Making for GTL. EI will neither provide GTL with copies of any ICS provider's confidential cost data, nor will it discuss confidential cost data with GTL. EI will file any confidential version of the report it produces from this confidential cost data, under seal, and no drafts of the confidential version will be shared with GTL personnel or its outside counsel.

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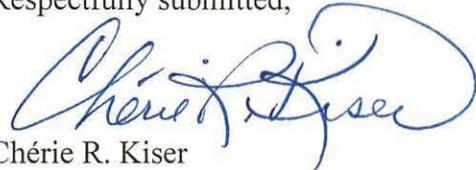
<sup>2</sup> *Rates for Interstate Inmate Calling Services*, 28 FCC Rcd 16954 (2013) ("*Protective Order*").

<sup>3</sup> *Id.*

<sup>4</sup> According to the FCC's rules, the FCC can take enforcement action against any person found to have "failed to comply with ... any rule, regulation or order issued by the Commission." 47 C.F.R. § 1.80.

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

Respectfully submitted,



Chérie R. Kiser  
Counsel for Global Tel\*Link Corporation

Attachments

cc: Attached Service List  
Pamela Arluk, Acting Chief, Pricing Policy Division, Wireline Competition Bureau  
(via electronic mail)  
Lynne Engledow, Acting Deputy Chief, Pricing Policy Division, Wireline Competition  
Bureau (via electronic mail)

**CERTIFICATE OF SERVICE**

I, Cara O. Schenkel, hereby certify that on this 12<sup>th</sup> day of November, 2014, a true and correct copy of the foregoing Request for Confidential Cost Data was served via First Class\* or electronic mail on the following persons:

Michael Layland\*  
ATN, Inc.  
913 Dilworth Street  
Saint Marys, GA 31558

Mark Lammert, CPA  
740 Florida Central Parkway  
Suite 2028  
Longwood, FL 32750  
[mark@csilongwood.com](mailto:mark@csilongwood.com)

*Consultant to Correct Solutions, LLC*

  
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Cara O. Schenkel