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*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 Request for Encartele, Inc. Confidential Cost
Data**

Dear Secretary Dortch:

Global Tel*Link Corporation (“GTL”),¹ by its attorneys, hereby requests a copy of the confidential cost data submitted by Encartele, Inc., in compliance with the Mandatory Data Collection. On October 29, 2014, GTL requested the confidential cost data submitted by all inmate calling services (“ICS”) providers in compliance with the Mandatory Data Collection. GTL has since learned that Encartele, Inc. also submitted confidential data in response to the Mandatory Data Collection.

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

Pursuant to the terms of the *Protective Order*,² GTL hereby requests that Encartele, Inc. provide a copy of its confidential data collection submission to GTL's outside consultant, Economists Incorporated ("EI"), which GTL has retained to conduct cost analyses. GTL and its counsel do not wish to see or receive the confidential cost data.

Encartele, Inc. should send its confidential cost data to:

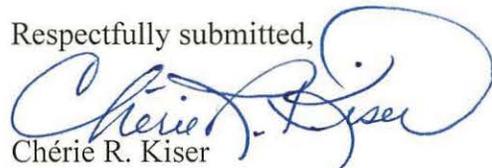
Steve Siwek
Principal
Economists Incorporated
2121 K St. NW, Suite 1100
Washington, DC 20037
202-223-4700 (telephone)

Mr. Siwek and all other individuals at EI who will be working with the data have executed the attached Acknowledgment of Confidentiality forms as required by the Protective Order issued December 19, 2013. 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.

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

Respectfully submitted,



Cherie R. Kiser
Counsel for Global Tel*Link Corporation

Attachments

cc: (via electronic mail)

Encartele, Inc.

Pamela Arluk, Acting Chief, Pricing Policy Division, Wireline Competition Bureau

Lynne Engledow, Acting Deputy Chief, Pricing Policy Division, Wireline Competition
Bureau

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

APPENDIX A

Acknowledgment of Confidentiality

WC Docket No. 12-375

I hereby acknowledge that I have received and read a copy of the foregoing Protective Order in the above-captioned proceeding, and I understand it.

I agree that I am bound by the Protective Order and that I shall not disclose or use Stamped Confidential Documents or Confidential Information except as allowed by the Protective Order.

I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission. I further acknowledge that the Commission retains its full authority to fashion appropriate sanctions for violations of this Protective Order, including but not limited to suspension or disbarment of Counsel or Consultants from practice before the Commission, forfeitures, cease and desist orders, and denial of further access to Confidential Information in this or any other Commission proceeding.

I acknowledge that nothing in the Protective Order limits any other rights and remedies available to a Submitting Party at law or in equity against me if I use Confidential Information in a manner not authorized by the Protective Order.

I certify that I am not involved in Competitive Decision-Making.

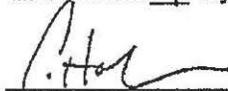
Without limiting the foregoing, to the extent that I have any employment, affiliation, or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or advocacy organization), I acknowledge specifically that my access to any information obtained as a result of the Protective Order is due solely to my capacity as Counsel or Outside Consultant to a Participant or as a person described in paragraph 8 of the foregoing Protective Order and agree that I will not use such information in any other capacity.

I acknowledge that it is my obligation to ensure that Stamped Confidential Documents are not duplicated except as specifically permitted by the terms of the Protective Order, and to ensure that there is no disclosure of Stamped Confidential Documents or Confidential Information in my possession or in the possession of those who work for me except as specifically permitted by the terms of the Protective Order.

I certify that I have verified that there are in place procedures at my firm or office to prevent unauthorized disclosure of Stamped Confidential Documents and Confidential Information.

Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Protective Order.

Executed this 29 day of October, 2013/2014.



[Name] Christopher C. Holt

[Position] Economist

[Firm] Economists Incorporated

[Telephone] (202) 833-5256

[Email] holt.c@ei.com

[address] 2121 K St. NW
Suite 1100
Washington, DC 20037

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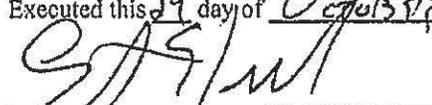
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Executed this 29 day of October, 2013/2014.



[Name] STEFAN F. SIU

[Position] PRINCIPAL

[Firm] ECONOMISTS INCORPORATED

[Telephone] SUITE 1100, 2121 K STREET NW
WASHINGTON, DC 20037

7 TEL: (202) 223-4700

EMAIL: Siu.K.S@E.I.COM

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Executed this 29 day of October, 2013/2014.

Alexandra Crafton

[Name] Alexandra Crafton

[Position] Research Associate

[Firm] Economists Incorporated

[Telephone] (202) 223-4700

Suite 1100

2121 K Street, NW

Washington, D.C. 20037

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email: crafton.a@ei.com

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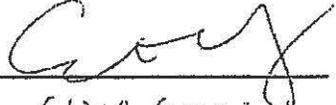
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Executed this 29 day of October, 2013/2014.



[Name] Elise Gunney
[Position] Research Associate
[Firm] E-Commisits Incorporated
[Telephone] 2121 K St, NW suite 1100
Washington DC 20037
7 202-833-5273
gunneye@eic.com

CERTIFICATE OF SERVICE

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

Scott Moreland
President
Encartele, Inc.
8206 South 109 Street
La Vista, NE 68128
Scott.moreland@encartele.net



Cara O. Schenkel