

Arent Fox

January 14, 2015

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Stephanie A. Joyce

Attorney
202.857.6081 DIRECT
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Re: WC Docket No. 12-375, Request for Confidential Don Wood Exhibits

Dear Ms. Dortch:

Securus Technologies, Inc. (“Securus”), through counsel, files this letter to request the confidential version of papers filed by, or on behalf of, Don Wood in this docket on January 12, 2015. Specifically, Securus requests the confidential, unredacted version of exhibits DJW-1 and DJW-2. This request is being served simultaneously on the ICS providers whose confidential data is included in those exhibits. Please see the attached Certificate of Service.

Neither Securus nor any of its outside legal counsel wish to see or receive the documents. Rather, Securus asks that the ICS providers send the data directly to FTI Consulting, Inc. which has been retained by Securus for performing cost analysis in connection with this proceeding. Each ICS provider should send the full, unredacted version of its cost data to:

Brian Pitkin
FTI Consulting, Inc.
1101 K Street, N.W.
Suite B100
Washington, D.C. 20005
Telephone 202.312.9100

Mr. Pitkin has executed the Protective Order adopted December 19, 2013, in this proceeding. See attached. In addition, no FTI personnel are Securus employees and none of them participate in Competitive Decision-Making for Securus.

FTI will not show to Securus or discuss with Securus any confidential data in the Don Wood papers other than data that was provided by Securus. The Confidential Version of the resulting FTI report will be filed by FTI under seal, and no drafts containing confidential data of any other ICS provider will be shared with Securus or its outside counsel. A Public Version of the report will be provided to Securus and the undersigned counsel for filing.

Arent Fox

Please do not hesitate to contact me with any questions: 202.857.6081.

Sincerely,

s/Stephanie A. Joyce

Counsel to Securus Technologies, Inc.

Attachments

Cc: Dennis J. Reinhold, Securus Technologies, Inc.
Brian Pitkin, FTI Consulting, Inc.
Pamela Arluk, Chief, Pricing Policy Division, Wireline Competition Bureau (*via electronic mail*)
Lynne Engledow, Deputy Chief, Pricing Policy Division, Wireline Competition Bureau (*via electronic mail*)
Attached service list

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 23 day of October, 2014.



Brian Pitkin

Managing Director

FTI Consulting, Inc.

202.312.9100

CERTIFICATE OF SERVICE

I hereby certify on this 14th day of January, 2015, that the foregoing Request for Confidential Don Wood Exhibits was served via First Class and electronic* mail on the following persons:

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By: s/Stephanie A. Joyce
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