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\*ADMITTED IN DC ONLY

January 14, 2015

**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 Confidential Version of Securus  
Technologies, Inc. Comments**

Dear Secretary Dortch:

Global Tel\*Link Corporation (“GTL”),<sup>1</sup> by its attorneys, hereby requests the confidential version of the Comments of Securus Technologies, Inc. on Second Further Notice of Proposed Rulemaking submitted January 12, 2015 (the “Comments”). The confidential version of the Comments should be provided to Economists Incorporated (“EI”), which GTL has retained to conduct analyses for this proceeding. GTL and its counsel do not wish to see or receive the confidential version of the Comments.

<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.

The confidential version of the Comments should be sent to:

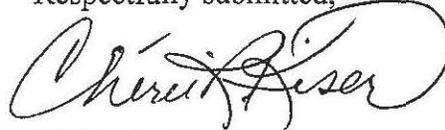
Steve Siwek  
Principal  
Economists Incorporated  
2121 K St. NW, Suite 1100  
Washington, DC 20037  
202-223-4700 (telephone)  
Siwek.s@east.ei.com

Mr. Siwek and all other individuals at EI who will be working with this information 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 confidential information, nor will it discuss confidential information with GTL. EI will file any confidential version of any report it produces from this information, 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,



Chérie R. Kiser

Counsel for Global Tel\*Link Corporation

#### Attachments

cc: Stephanie A. Joyce, Counsel to Securus Technologies, Inc. (via electronic mail)  
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)

## 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.

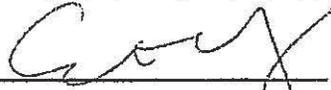
Without limiting the foregoing, to the extent that I have any employment, affiliation, or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or advocacy organization), I acknowledge specifically that my access to any information obtained 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 21 day of October, 2013/2014.

  
 [Name] Elise Gurney  
 [Position] Research Associate  
 [Firm] Econometrics Incorporated  
 [Telephone] 2121 K St, NW Suite 1100  
 Washington, DC 20037  
 202-833-5273  
 gurney@econometrics.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  
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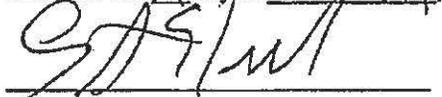
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Executed this 29 day of October, 2013/2014.



[Name] STEPHEN F. SINAK

[Position] PRINCIPAL

[Firm] ECONOMISTS INCORPORATED

[Telephone] SUITE 1100, 2121 K STREET NW  
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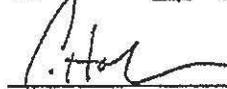
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Executed this 29 day of October, 2013/2014.



[Name] Christopher C. Holt

[Position] Economist

[Firm] Economists Incorporated

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**CERTIFICATE OF SERVICE**

I, Cara O. Schenkel, hereby certify that on this 14<sup>th</sup> day of January, 2015, a true and correct copy of the foregoing Request for Confidential Version of Securus Technologies, Inc. Comments was served via electronic mail on the following persons:

Stephanie A. Joyce  
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202-857-6081 (telephone)  
Stephanie.joyce@arentfox.com

*Counsel to Securus Technologies, Inc.*

  
\_\_\_\_\_  
Cara O. Schenkel