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January 30, 2015

Via ECFS

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

Re: WC Docket No. 12-375 – Request for Confidential, Unredacted Versions of Securus’ Documents Filed in WC Docket No. 12-375 on January 27, 2015

Dear Ms. Dortch:

Attached please find a copy of Pay Tel’s “Request for Confidential, Unredacted Versions of Securus’ Documents Filed in WC Docket No. 12-375 on January 27, 2015”.

Please do not hesitate to contact me if you have any questions regarding same.

Sincerely,

BROOKS, PIERCE, McLENDON,
HUMPHREY & LEONARD, L.L.P.

Timothy G. Nelson
Direct Dial: (919) 573-6205
tnelson@brookspierce.com

Attachment

January 30, 2015

Via E-Mail

Stephanie A. Joyce
Arent Fox, LLP
1717 K Street, NW
Washington, D.C. 20036

Stephanie.joyce@arentfox.com

Re: WC Docket No. 12-375 – Request for Confidential, Unredacted Versions of Securus’ Documents Filed in WC Docket No. 12-375 on January 27, 2015

Dear Ms. Joyce:

Pay Tel Communications, Inc., pursuant to the Protective Order¹ issued on December 19, 2013 in the above-captioned proceeding, requests by way of this letter confidential versions of papers filed by, or on behalf of, Securus Technologies, Inc. in this docket on January 27, 2015. Specifically, and without limitation, Pay Tel requests the confidential version of the documents titled “Reply Comments of Securus Technologies, Inc. on Second Further Notice of Proposed Rulemaking” and the attachment thereto titled “FTI Consulting, Inc. Response to Second Further Notice Declaration of Coleman Bazelon and Expert Report of Don J. Wood on Behalf of Securus Technologies, Inc.” Pay Tel will file a copy of this request into the record in WC Docket No. 12-375 via ECFS.

Note that, at this time, neither Pay Tel nor its Outside Counsel is requesting access to or delivery of the confidential documents.² Rather, Pay Tel asks that you and/or FTI Consulting send the documents directly to Mr. Don J. Wood, Pay Tel’s Outside Consultant in this proceeding. Please send (email is preferred) the confidential version of the above-requested documents to:

¹ WC Dkt. No. 12-375, Protective Order, DA 13-2434 (rel. Dec. 19, 2013).

² For the reasons articulated separately in this docket, Pay Tel firmly believes that the Protective Order permits review of Confidential Information submitted in this proceeding by its Outside Counsel (Marcus W. Trathen and Timothy G. Nelson). However, due to objections previously raised by Global Tel*Link, Securus and Telmate to production of confidential information to Pay Tel’s Outside Counsel, and in an effort to handle this matter efficiently, Pay Tel’s Outside Counsel is not requesting, at this time, access to the confidential documents, but reserves all rights thereto.

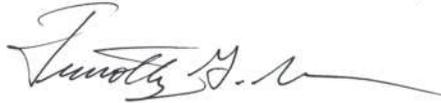
Don J. Wood
WOOD & WOOD
914 Stream Valley Trail
Alpharetta, Ga 30022
don.wood@woodandwood.net

In accord with the Protective Order, attached hereto please find a copy of Mr. Wood's executed Acknowledgment of Confidentiality.

I appreciate your prompt response to this request. Please do not hesitate to contact me if you have any questions regarding same.

Sincerely,

BROOKS, PIERCE, McLENDON,
HUMPHREY & LEONARD, L.L.P.



Timothy G. Nelson
Direct Dial: (919) 573-6205
tnelson@brookspierce.com

Attachment

cc:

Don Wood, Wood & Wood
Pamela Arluk, Chief, Pricing Policy Division, WC Bureau (via email)
Lynne Engledow, Deputy Chief, Pricing Policy Division, WC Bureau (via email)

CERTIFICATE OF SERVICE

I hereby certify that on this, the 30th day of January, 2015, the foregoing “WC Docket No. 12-375 – Request for Confidential, Unredacted Versions of Securus’ Documents Filed in WC Docket No. 12-375 on January 27, 2015” was served by electronic mail on the following persons:

Stephanie A. Joyce
Arent Fox, LLP
1717 K Street, NW
Washington, D.C. 20036
Stephanie.joyce@arentfox.com

Counsel to Securus Technologies, Inc.

By: s/ Timothy G. Nelson
Timothy G. Nelson

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 25th day of JULY, 2013/2014.



[Name] Dow J. Woods

[Position] PRESIDENT / SENIOR PARTNER

[Firm] Woods & Woods Consulting, Inc.

[Telephone] 770.475.9971