

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Rates for Interstate Inmate Calling Services) WC Docket No. 12-375
)
)
_____)

GLOBAL TEL*LINK CORPORATION’S MOTION FOR SANCTIONS

Pursuant to Sections 1.24 and 1.41 of the Commission’s rules,¹ Global Tel*Link Corporation (“GTL”),² by its undersigned counsel, respectfully requests that the Federal Communications Commission (“Commission”) impose appropriate sanctions upon Darrell A. Baker (“Baker”) and the Alabama Public Service Commission (“PSC”) for violating the *Protective Order* issued by the Commission in the above-referenced proceeding.³

PRELIMINARY STATEMENT

Baker, in his capacity as an employee of the PSC, obtained access to Confidential Information (as defined in the *Protective Order*)⁴ filed by GTL and other inmate calling service (“ICS”) providers consisting of rates, minutes of use, and other detailed data. Baker in such capacity executed an acknowledgement that he read, understood, and would abide by the terms of the *Protective Order* in this proceeding. In plain contravention of the express provisions of that *Protective Order*, Baker on July 8, 2015, filed GTL’s Confidential Information on ECFS,

¹ 47 C.F.R. §§ 1.24, 1.41.

² This filing is made by GTL on behalf of itself and its wholly owned subsidiaries that also provide inmate calling services: DSI-ITI, LLC, Public Communications Services, Inc., and Value-Added Communications, Inc.

³ *Rates for Interstate Inmate Calling Services*, 28 FCC Rcd 16954 (2013) (“*Protective Order*”); *see also Rates for Interstate Inmate Calling Services*, 28 FCC Rcd 14107 (2013) (“*ICS Order and First FNPRM*”), *pets. for stay granted in part sub nom. Securus Tech., Inc. v. FCC*, No. 13-1280 (D.C. Cir. Jan.13, 2014), *pets. for review pending sub nom. Securus Tech., Inc. v. FCC*, No. 13-1280 (D.C. Cir. filed Nov. 14, 2013) (and consolidated cases); *Rates for Interstate Inmate Calling Services*, 29 FCC Rcd 13170 (2014) (“*Second ICS FNPRM*”).

⁴ *Protective Order* ¶ 2.

where it became and remained available to the public for the morning of July 9, 2015. Even after this violation was called to his attention, he apparently did not make the effort to review the terms of the *Protective Order* and made only a perfunctory apology for “the confusion that ensued.” GTL respectfully requests that the Commission impose sanctions for the serious breach of the *Protective Order* arising from, at the very least, Baker’s indifference to its provisions.

FACTS

On December 19, 2013, the Commission adopted a *Protective Order* in this proceeding.⁵ Paragraph 9 of the *Protective Order* pertains to filings with the Commission and requires that a Reviewing Party “may disclose Confidential Information in any document that it files in this proceeding (*e.g.*, comments) only if it complies with the following procedure.” The outlined procedure prescribes that unredacted or CONFIDENTIAL copies are to be submitted to the Secretary’s Office with appropriate legends on each page, with a redacted copy to be filed via ECFS. Specifically, as respects the ECFS filing, the *Protective Order* provides: “The party shall submit a copy of the filing *in redacted form, i.e., containing no Confidential Information* (the ‘Redacted Confidential Filing’), to the Commission via ECFS.”⁶ Paragraph 16 of the *Protective Order* provides that if a Reviewing Party violates any of the terms of the *Protective Order*, “such Reviewing Party shall immediately convey that fact to the Commission and to the Submitting Party” and “shall take all necessary steps to remedy the improper disclosure.”

On August 22, 2014 and September 29, 2014, GTL filed with the Commission Confidential Information relating to its costs of providing inmate calling services, its revenue-producing minutes of use, its costs of ancillary services and fees, and certain portions of its

⁵ See Exhibit 1 to Declaration of Angela F. Collins in Support of Global Tel*Link Corporation’s Motion for Sanctions (attached hereto) (hereinafter “Collins Declaration”).

⁶ *Protective Order* ¶ 9 (emphasis supplied; footnote omitted).

Description and Justification prepared by Economists, Inc.⁷ The transmittal letter and each page of data in the unredacted portion of the submission sent to the Secretary of the Commission were captioned in solid capital letters: “CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NO. 12-375 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION.”⁸ GTL also filed a redacted copy of this information on ECFS.⁹

On December 5, 2014, Baker, in his stated capacity as Director, Utility Services Division of the PSC, executed an Acknowledgement of Confidentiality and forwarded this to both the Commission and counsel for GTL.¹⁰ This Acknowledgement expressly stated that Baker “read a copy of the foregoing Protective Order in the above-captioned proceeding, and I understand it.” It further provided, “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.” Baker also expressly acknowledged “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.” Finally, Baker certified that he “verified that there are in place procedures at my firm or office to prevent unauthorized disclosure of Stamped Confidential Documents and Confidential Information.” In response to this, GTL’s counsel on December 11, 2014, forwarded to Mr. Baker the unredacted information

⁷ Collins Declaration ¶ 3.

⁸ Collins Declaration ¶ 3.

⁹ Collins Declaration, Exhibit 2.

¹⁰ Collins Declaration, Exhibits 3, 4.

previously submitted to the Commission on August 22, 2014 and September 29, 2014, repeating the solid capitals caption set forth above.¹¹

In July 2014, Baker participated as a panelist in the Commission's Workshop on Further Reform of Inmate Calling Services.¹² Since September 2014, Baker and the PSC have made numerous filings in this proceeding.¹³

On July 8, 2015, Baker made a submission to the Secretary of the Commission analyzing costs and minutes of use of GTL and six other ICS providers with exhibits setting forth detailed data.¹⁴ The detailed data included for various providers the numbers of calls, minutes of use, commissions broken out by types of calls, and other competitively sensitive information stratified by categories based on size of average daily inmate population.¹⁵ This submission was captioned, "CONFIDENTIAL INFORMATION SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NO. 12-375 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION." Baker also submitted a redacted version of this filing on ECFS.¹⁶ Baker, however, in contravention of Paragraph 9 of the *Protective Order*, filed both the unredacted and the redacted versions via ECFS, thus allowing anyone with Internet access to view GTL's Confidential Information (as well as the Confidential Information of the other ICS providers).¹⁷ Although

¹¹ Collins Declaration, Exhibit 5.

¹² Collins Declaration ¶ 6.

¹³ Collins Declaration, Exhibit 6.

¹⁴ Collins Declaration ¶ 8.

¹⁵ Collins Declaration, Exhibit 7; *see also* Collins Declaration, Exhibit 2.

¹⁶ Collins Declaration, Exhibit 7.

¹⁷ Collins Declaration ¶ 8.

Baker's July 8, 2015 submission indicates it was filed by him as an individual,¹⁸ the Confidential Information contained therein was obtained by Baker in his capacity as a PSC employee.¹⁹

GTL's counsel was alerted to the filing on the morning of July 9, 2015 when it was posted on ECFS. GTL's counsel noted that Confidential Information was publicly available in the filing and immediately emailed the Commission to request that the filing be pulled from ECFS, with a copy to Baker.²⁰ The Commission took down the filing approximately three hours after it was posted.²¹

GTL is not aware what steps, if any, Baker or the PSC took to notify the Commission or the other Submitting Parties of the violation of the *Protective Order* or to remedy the improper disclosure. On July 9, 2015, Baker responded to the copy sent to him of the email GTL's counsel sent to the Commission, stating:

“Did I submit it incorrectly?

I submitted a redacted version clearly identified as such and labeled for public view.

I submitted a separate confidential version clearly identified (in red font) as confidential. Even the file names for confidential info included the term ‘confidential.’

I apologize for the confusion that ensued.”²²

ARGUMENT

This is a serious breach of the *Protective Order*. GTL previously has made submissions to the Commission underscoring the competitively sensitive nature of the information in

¹⁸ Collins Declaration, Exhibit 7 at n.1

¹⁹ Collins Declaration, Exhibits 3, 4.

²⁰ Collins Declaration, Exhibit 8; *see also* Collins Declaration ¶ 8.

²¹ Collins Declaration ¶ 8.

²² Collins Declaration, Exhibit 9.

question.²³ This Confidential Information was available on ECFS for approximately three hours, during which any party interested in the Commission's ICS docket or who received an alert notifying them of the filing could have viewed it. GTL has no way to determine who accessed the Confidential Information or to what use the Confidential Information has been or will be put potentially to GTL's competitive detriment. The same presumably is true of the other ICS providers whose information was referenced in Baker's submission.

The circumstances of the breach are aggravated. While Baker no doubt will claim that the breach was due to a simple oversight or misunderstanding on his part, Baker acted with contempt for the *Protective Order*:

- Despite Baker's express acknowledgement that he read and understood the *Protective Order*, his failure to follow the procedure required by Paragraph 9 demonstrates that, at a minimum, he either did not read or did not understand the *Protective Order*.
- His failure to follow the procedure required by Paragraph 9 also demonstrates that he either did not reread the *Protective Order* before making his July 8th submission despite the prominent references to it in the various solid-capital legends on the documents in question or chose to ignore its provisions.
- By virtue of following, appearing as a panelist in, and making numerous prior written submissions in this proceeding over a period of about a year, Baker and the PSC necessarily understood that ECFS filings are publicly available,²⁴ but Baker and the PSC still did not take the precaution to remove the Confidential Information included in the ECFS filing.
- Even after the breach was called to his attention, Baker apparently did not make the effort to review and understand the relevant provisions of the *Protective Order* given (a) his query in the July 9th email, "Did I submit it incorrectly?" and (b) the apparent absence of any notification by Baker to the Commission or the other Submitting Parties of the violation.

²³ See WC Docket No. 12-375, Global Tel*Link Corporation Objection to Disclosure of Confidential Information (dated Sept. 12, 2014) (Collins Declaration, Exhibit 10); WC Docket No. 12-375, Letter from Chérie R. Kiser, Counsel to GTL (dated Oct. 6, 2014) (Collins Declaration, Exhibit 11).

²⁴ When making a filing via ECFS, the Commission's website specifically states: "Note: You are filing a document into an official FCC proceeding. All information submitted including names and address will be publicly available via the web." See Electronic Comment Filing System Upload Display, <http://apps.fcc.gov/ecfs/upload/display>.

- Baker’s perfunctory apology for “the confusion that ensued” shows no appreciation, let alone remorse, for the potential competitive harm to GTL and the other Submitting Parties he has caused.

At the least, Baker and the PSC have proceeded with deliberate indifference to the terms and conditions of the *Protective Order*. At worst, Baker and the PSC may have willfully violated the *Protective Order*.

The Commission has a wide range of steps available to it to respond to this violation. The *Protective Order* itself, in Paragraph 16, enumerates the following non-exhaustive list of potential sanctions:

- Suspension or disbarment of Counsel or Outside Consultants from practice before the Commission;²⁵
- Forfeitures;²⁶
- Cease and desist orders; and
- Denial of further access to Confidential Information in this or any other Commission proceeding.

We will not be presumptuous and suggest how we think the Commission should exercise its discretion in this matter but trust the Commission to fashion appropriate measures. The Commission has made clear in the context of protective orders that it will not hesitate to enforce them.²⁷

²⁵ Baker apparently is not an attorney, and it is not clear if he is an “Outside Consultant” under the definition in the *Protective Order* given that he apparently is an in-house employee of PSC. The Commission, however, retains inherent “authority under the Act, as well as under basic administrative law principles, to apply sanctions in order to ensure the integrity of Commission processes” as respects any signatory to a submission. *See Warren C. Havens*, 27 FCC Rcd 2756, ¶ 10 (2012); *see also Applications of Comcast Corp. and Time Warner Cable Inc., et al.*, 29 FCC Rcd 11864, ¶ 7 (2014) (“Potential sanctions are not limited to counsel alone.”) (subsequent history omitted).

²⁶ *See* 47 U.S.C. § 503(b)(1)(B); 47 C.F.R § 1.80.

²⁷ *Applications of Comcast Corp. and Time Warner Cable Inc., et al.*, 29 FCC Rcd 11864, ¶ 7 (2014) (“The Commission will not hesitate to take swift and decisive enforcement action where warranted for violation of its orders.”) (subsequent history omitted); *Applications of America Online, Inc. and Time Warner Inc. for Transfers of Control*, 16 FCC Rcd 2400, ¶ 36 (2001) (“We further emphasize that we reserve the right to apply the full range of sanctions to any person violating this or other Protective Orders in the future.”); *see also Craig O. McCaw*,

Accordingly, GTL respectfully requests that the Commission impose appropriate sanctions upon Darrell A. Baker and the Alabama Public Service Commission for violating the *Protective Order* issued by the Commission in this proceeding.

Respectfully submitted,

GLOBAL TEL*LINK CORPORATION

/s/ Cherie R. Kiser

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Dated: July 16, 2015

Its Attorneys

Transferor and American Telephone and Telegraph Company, Transferee for Consent to the Transfer of Control of McCaw Cellular Communications, Inc. and its Subsidiaries, 9 FCC Rcd 5836, ¶ 163 (1994) (“Protection of commercially sensitive materials submitted by parties pursuant to protective orders and confidentiality agreements is a very serious matter requiring vigilance by Commission staff as well as all parties gaining access to such information.”).

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Rates for Interstate Inmate Calling Services) WC Docket No. 12-375
)
_____)

**DECLARATION OF ANGELA F. COLLINS
IN SUPPORT OF
GLOBAL TEL*LINK CORPORATION'S MOTION FOR SANCTIONS**

I, Angela F. Collins, state as follows:

1. I am admitted to the bar of the District of Columbia. I am Counsel with the law firm of Cahill Gordon & Reindel LLP, which represents Global Tel*Link Corporation (“GTL”) and its affiliates in this proceeding.

2. Attached hereto as Exhibit 1 is a true and correct copy of the December 19, 2013 Protective Order issued in this proceeding.

3. Attached hereto as Exhibit 2 is a true and correct copy of the redacted filings of Confidential Information made by GTL in this proceeding on August 22, 2014 and September 29, 2014. On the same dates, GTL also submitted unredacted versions of those filings to the Secretary of the Federal Communications Commission (“Commission”). The transmittal letter and each page of data in the unredacted filings were captioned in solid capital letters: “CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NO. 12-375 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION.” These submissions related to GTL’s costs of providing inmate calling services, its revenue-producing minutes of use, its costs of ancillary services and fees, and certain portions of its Description and Justification prepared by Economists, Inc.

4. Attached hereto as Exhibits 3 and 4 are true and correct copies of an Acknowledgement of Confidentiality executed by Darrell A. Baker (“Baker”) on December 5, 2014 as sent to, respectively, the Commission and counsel for GTL.

5. Attached hereto as Exhibit 5 is a true and correct copy of a transmittal letter from counsel to GTL to Baker, dated December 11, 2014. The enclosures consisted of the unredacted August 22, 2014 and September 29, 2014 submissions by GTL to the Commission referenced in paragraph 3 above.

6. The transcript of proceedings from the Commission’s July 2014 workshop in connection with this proceeding reflects that Baker participated as a panelist. A copy of the transcript is available at: <https://www.fcc.gov/events/workshop-further-reform-inmate-calling-services>.

7. Attached hereto as Exhibit 6 is a true and correct screenshot from ECFS reflecting the filings made by Baker and the Alabama Public Service Commission in this proceeding.

8. Attached hereto as Exhibit 7 is a true and correct copy of the redacted submission made by Baker to the Commission in this proceeding on July 8, 2015. I was alerted to the filing of this submission on the morning of July 9, 2015. Upon checking ECFS, I discovered that Baker filed the unredacted version (as well as the redacted version) on ECFS, and that GTL’s Confidential Information (along with the information of other inmate calling service providers) was publicly available on ECFS. I immediately contacted the Commission to request that the unredacted filing be removed from ECFS. Attached as Exhibit 8 is a true and correct copy of an email I sent to this effect to the Commission, which I copied to Baker. I subsequently checked and determined that the filing containing the Confidential Information was removed from ECFS approximately three hours after it was posted.

9. Attached as Exhibit 9 is a true and correct copy of an email I received from Baker on July 9, 2015.

10. Attached as Exhibit 10 is a true and correct copy of GTL's Objection to Disclosure of Confidential Information, dated September 12, 2014.

11. Attached as Exhibit 11 is a true and correct copy of GTL's further objection to the disclosure of its Confidential Information, dated October 6, 2014.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on July 16, 2015

A handwritten signature in cursive script that reads "Angela Collins".

Angela F. Collins

Collins Declaration

Exhibit 1

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of
Rates for Interstate Inmate Calling Services
WC Docket No. 12-375

PROTECTIVE ORDER

Adopted: December 19, 2013

Released: December 19, 2013

By the Chief, Wireline Competition Bureau:

1. In this Protective Order, the Wireline Competition Bureau (Bureau) adopts procedures to provide limited access to proprietary or confidential information filed in this proceeding. We anticipate that such information will be necessary to develop a more complete record on which to base the Commission's decision. While the Bureau is mindful of the sensitive nature of such filings, we are also mindful of the right of the public to participate in this proceeding in a meaningful way. The Bureau therefore will make such information available to participants in this proceeding, but only pursuant to a protective order. The Bureau concludes that the procedures adopted in this Protective Order give appropriate access to the public while protecting proprietary and confidential information from improper disclosure, and that the procedures thereby serve the public interest.

2. Definitions. As used herein, capitalized terms not otherwise defined in this Protective Order shall have the following meanings:

"Acknowledgement" means the Acknowledgement of Confidentiality attached as Appendix A hereto.

"Competitive Decision-Making" means a person's activities, association, or relationship with any of its clients involving advice about or participation in the relevant business decisions or the analysis underlying the relevant business decisions of the client in competition with or in a business relationship with the Submitting Party.

"Confidential Information" means information that is not otherwise available from publicly available sources and that is subject to protection under the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, and the Commission's implementing rules.

"Counsel" means In-House Counsel and Outside Counsel of Record.

"Document" means any written, recorded, electronically stored, or graphic material, whether produced or created by the Submitting Party or another person. For the sake of clarity, the term "document" includes responses created and submitted to the Commission electronically.

"In-House Counsel" means an attorney employed by a Participant to this proceeding or employed by an affiliated entity and who is actively engaged in the conduct of this proceeding, provided that such attorney is not involved in Competitive Decision-Making. (In this regard, an In-House Counsel's employer is considered his or her client.)

"Outside Counsel of Record" or "Outside Counsel" means the attorney(s), firm(s) of attorneys, or sole practitioner(s), as the case may be, representing a Participant in this proceeding, provided that such

attorneys are not involved in Competitive Decision-Making. The term “Outside Counsel of Record” includes any attorney representing a non-commercial Participant in this proceeding, provided that such attorney is not involved in Competitive Decision-Making.

“Outside Consultant” means a consultant or expert retained for the purpose of assisting Counsel or a Participant in this proceeding, provided that such consultant or expert is not involved in Competitive Decision-Making. The term “Outside Consultant” includes any consultant or expert employed by a non-commercial Participant in this proceeding, provided that such consultant or expert is not involved in Competitive Decision-Making.

“Outside Firm” means a firm, whether organized as a partnership, limited partnership, limited liability partnership, limited liability company, corporation or otherwise, of Outside Counsel or Outside Consultants.

“Participant” means a person or entity that has filed, or has a good faith intention to file, material comments in this proceeding.

“Redacted Confidential Document” means a copy of a Stamped Confidential Document where the Confidential Information has been redacted.

“Reviewing Party” means a person who has obtained access to Confidential Information (including Stamped Confidential Documents) pursuant to paragraphs 5 or 8 of this Protective Order.

“Stamped Confidential Document” means any document, or any part thereof, that contains Confidential Information and that bears the legend (or which otherwise shall have had the legend recorded upon it in a way that brings its attention to a reasonable examiner) “CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NO. 12-375 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION,” unless the Commission determines, *sua sponte*, by request pursuant to paragraph 3 of this Protective Order, or by request pursuant to sections 0.459 or 0.461 of the Commission’s rules, that any such document is not entitled to confidential treatment. By designating a document a “Stamped Confidential Document,” a Submitting Party signifies and represents that it contains Confidential Information.

“Submitting Party” means a person or entity who submits a Stamped Confidential Document.

3. *Effect of Designation of Information as Confidential.* By designating documents and information as Confidential under this Protective Order, a Submitting Party will be deemed to have submitted a request that the material not be made routinely available for public inspection under the Commission’s rules.¹ Any person wishing to challenge the designation of a document or portion of a document as Confidential must file such a challenge at the Commission and serve it on the Submitting Party. The Submitting Party must file any reply within five business days, and include a justification for treating the information as confidential.² The documents and information challenged will continue to be accorded confidential treatment until the Commission acts on the request and all subsequent appeal and stay proceedings have been exhausted.³ Any decision on whether the materials should be accorded confidential treatment does not constitute a resolution of the merits concerning whether such information would be released publicly by the Commission upon a proper request under our rules implementing FOIA.⁴

¹ See 47 C.F.R. §§ 0.459(a), 0.459(a)(3).

² See 47 C.F.R. § 0.459(b).

³ See 47 C.F.R. § 0.459(g).

⁴ See 47 C.F.R. §§ 0.459(h), 0.461.

4. *Submission of Stamped Confidential Documents.* A Submitting Party shall submit to the Secretary's Office one copy of each Stamped Confidential Document it wishes to file and an accompanying cover letter. Each page of the Stamped Confidential Document shall be stamped "CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NO. 12-375 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION." The cover letter also shall contain this legend. In addition, with respect to each Stamped Confidential Document submitted, each Submitting Party shall also file through the Commission's Electronic Comment Filing System ("ECFS") a copy of the respective Redacted Confidential Document and an accompanying cover letter. Each Redacted Confidential Document shall have the same pagination as the Stamped Confidential Document from which it is derived. Each page of the Redacted Confidential Document and the accompanying cover letter shall be stamped "REDACTED – FOR PUBLIC INSPECTION." To the extent that any page of the filing contains both Confidential Information and non-confidential information, only the Confidential Information may be redacted and the page of the unredacted filing shall clearly distinguish the Confidential Information from the non-confidential information. In addition, two copies of each Stamped Confidential Document and the accompanying cover letter must be delivered as directed by Commission staff. Filers may contact Lynne Engledow of the Wireline Competition Bureau at (202) 418-1520 for additional direction.

5. *Procedure for Obtaining Access to Stamped Confidential Documents and Confidential Information.* Any person seeking access to Stamped Confidential Documents and Confidential Information subject to this Protective Order shall sign and date the Acknowledgment agreeing to be bound by the terms and conditions of the Protective Order and file the Acknowledgment with the Bureau, on behalf of the Commission. Such person shall also serve a copy of the Acknowledgment upon the relevant Submitting Party through its Counsel of Record so that it is received at least five business days prior to such person's reviewing or having access to the Submitting Party's Stamped Confidential Documents or Confidential Information, except that, where the person seeking access is one described in either clause 1 or 2 of paragraph 8, the Acknowledgment shall be delivered promptly prior to the person's obtaining access. Each Submitting Party shall have an opportunity to object to the disclosure of its Stamped Confidential Documents or Confidential Information to any such person. A Submitting Party must file any such objection at the Commission and serve it on Counsel representing, retaining or employing such person within three business days after receiving a copy of that person's Acknowledgment (or where the person seeking access is one described in clause 1 or 2 of paragraph 8, file and serve such objection as promptly as practicable after receipt of the Acknowledgment). Further, if a Submitting Party files additional Confidential Documents, it must file any objection to the disclosure of those additional Confidential Documents to any Reviewing Party before or contemporaneous with filing those documents. Until any objection is resolved by the Commission and, if appropriate, by any court of competent jurisdiction, and unless such objection is resolved in favor of the person seeking access, a person subject to an objection from a Submitting Party shall not have access to the relevant Stamped Confidential Documents or Confidential Information.

6. *Review of Stamped Confidential Documents.* A Submitting Party shall make available for review the Stamped Confidential Documents of such party at the offices of the party's Outside Counsel of Record or, if the Submitting Party does not have Outside Counsel of Record, at the offices of such party's In-House Counsel. A Reviewing Party shall be provided the following alternatives: (1) a Reviewing Party shall be provided adequate opportunity to inspect the documents on site; (2) a Reviewing Party may inspect the documents on site with the ability to request copies, at cost, of some or all of the documents; or (3) a Reviewing Party may request a complete set of the documents at cost, allowing two business days after the request is made for receipt of the copies. If a Reviewing Party plans on requesting a complete set of documents, it is encouraged to make such a request at the time it submits the Acknowledgment to allow it the opportunity to begin reviewing the documents at the end of the five-day period referred to in paragraph 5. All copies of documents that are removed from the Submitting Party's office must be returned or destroyed in accordance with the terms of paragraph 17.

7. *Use of Confidential Information.* Persons obtaining access to Confidential Information (including Stamped Confidential Documents) under this Protective Order shall use the information solely for the preparation and conduct of this proceeding before the Commission and any subsequent judicial proceeding arising directly from this proceeding and, except as provided herein, shall not use such documents or information for any other purpose, including without limitation business, governmental, or commercial purposes, or in other administrative, regulatory or judicial proceedings. Should any Bureau or the Commission rely upon or otherwise make reference to the contents of any of the Stamped Confidential Documents or Confidential Information in its decisions in this proceeding, it will do so by redacting any Confidential Information from the public version of the decision and by making the unredacted version of the decision available only to a court and to those persons entitled to access to Confidential Information under this Protective Order.

8. *Permissible Disclosure.* A Reviewing Party may discuss and share the contents of the Stamped Confidential Documents and Confidential Information with another Reviewing Party and with the Commission and its staff. A Submitting Party's Stamped Confidential Documents and Confidential Information may also be disclosed to employees and Counsel of the Submitting Party. Subject to the requirements of paragraph 5, a Reviewing Party may disclose Stamped Confidential Documents and Confidential Information to: (1) paralegals or other employees of such Reviewing Party assisting them in this proceeding; and (2) employees of third-party contractors involved solely in one or more aspects of organizing, filing, coding, converting, storing, or retrieving documents or data or designing programs for handling data connected with this proceeding, or performing other clerical or ministerial functions with regard to documents connected with this proceeding.

9. *Filings with the Commission.* A Reviewing Party or a Submitting Party may disclose Confidential Information in any document that it files in this proceeding (*e.g.*, comments) only if it complies with the following procedure. The party shall submit to the Secretary's Office one copy of the filing containing Confidential Information (the "Confidential Filing") and an accompanying cover letter. The cover or first page of the Confidential Filing and each page of the Confidential Filing that contains or discloses Confidential Information must be clearly marked "CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NO. 12-375 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION." The cover letter shall also contain this legend. The Confidential Filing shall be made under seal, and will not be placed in the Commission's public file. The party shall submit a copy of the filing in redacted form, *i.e.*, containing no Confidential Information (the "Redacted Confidential Filing"), to the Commission via ECFS.⁵ The Redacted Confidential Filing and the accompanying cover letter shall be stamped "REDACTED – FOR PUBLIC INSPECTION." The cover letter accompanying the Redacted Confidential Filing shall state that the Submitting Party is filing a redacted version of the filing. Each Redacted Confidential Filing shall have the same pagination as the Confidential Filing from which it is derived. To the extent that any page of the Confidential Filing contains both Confidential Information and non-confidential information, only the Confidential Information may be redacted and the page of the unredacted Confidential Filing shall clearly distinguish the Confidential Information from the non-confidential information. Two copies of each Confidential Filing and the accompanying cover letter must be delivered as directed by Commission staff, and one copy must be served on the relevant Submitting Party. Parties should not provide courtesy copies of pleadings containing Confidential Information to Commission staff unless the Bureau so requests, and any such courtesy copies shall be submitted under seal. Filers may contact Lynne Engledow of the Wireline Competition Bureau at (202) 418-1520 for additional direction.

⁵ If a party is not able to submit a copy of the Redacted Confidential Filing via ECFS, it must submit two copies of the Redacted Confidential Filing to the Secretary's Office along with the appropriately stamped cover letter, as described in this paragraph.

10. *Non-Disclosure of Stamped Confidential Documents.* Except with the prior written consent of the Submitting Party, or as provided under this Protective Order or a subsequent Bureau or Commission order, Stamped Confidential Documents and Confidential Information may not be disclosed further.

11. *Protection of Stamped Confidential Documents and Confidential Information.* A Reviewing party shall have the obligation to ensure that access to Stamped Confidential Documents and Confidential Information is strictly limited as prescribed in this Protective Order. A Reviewing Party shall further have the obligation to ensure that Stamped Confidential Documents and Confidential Information are used only as provided in this Protective Order.

12. *Requests for Additional Disclosure.* If any person requests disclosure of Confidential Information outside the terms of this Protective Order, such a request will be treated in accordance with sections 0.442 and 0.461 of the Commission's rules.

13. *Client Consultation.* Nothing in this Protective Order shall prevent or otherwise restrict Counsel from rendering advice to their clients relating to the conduct of this proceeding and any subsequent judicial proceeding arising therefrom and, in the course thereof, relying generally on examination of Stamped Confidential Documents or Confidential Information; *provided, however*, that in rendering such advice and otherwise communicating with such client, Counsel shall not disclose Stamped Confidential Documents or Confidential Information.

14. *No Waiver of Confidentiality.* Disclosure of Confidential Information as provided herein by any person shall not be deemed a waiver by any Submitting Party of any privilege or entitlement to confidential treatment of such Confidential Information. Reviewing Parties, by viewing this material, agree: (1) not to assert any such waiver; (2) not to use Confidential Information to seek disclosure in any other proceeding; and (3) that accidental disclosure of Confidential Information by a Submitting Party shall not be deemed a waiver of any privilege or entitlement as long as the Submitting Party takes prompt remedial action.

15. *Subpoena by Courts, Departments, or Agencies.* If a court, or a federal or state department or agency issues a subpoena for or orders the production of Stamped Confidential Documents or Confidential Information that a party has obtained under terms of this Protective Order, such party shall promptly notify each Submitting Party of the pendency of such subpoena or order. Consistent with the independent authority of any court, department or agency, such notification must be accomplished such that the Submitting Party has a full opportunity to oppose such production prior to the production or disclosure of any Stamped Confidential Document or Confidential Information.

16. *Violations of Protective Order.* Should a Reviewing Party violate any of the terms of this Protective Order, such Reviewing Party shall immediately convey that fact to the Commission and to the Submitting Party. Further, should such violation consist of improper disclosure of Confidential Information, the violating person shall take all necessary steps to remedy the improper disclosure. 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 Outside 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. Nothing in this Protective Order shall limit any other rights and remedies available to the Submitting Party at law or in equity against any person using Confidential Information in a manner not authorized by this Protective Order.

17. *Termination of Proceeding.* The provisions of this Protective Order shall not terminate at the conclusion of this proceeding. Within two weeks after conclusion of this proceeding and any administrative or judicial review, or as otherwise directed by the Bureau, Reviewing Parties shall destroy or return to the Submitting Party Stamped Confidential Documents and all copies of the same. No material whatsoever derived from Stamped Confidential Documents may be retained by any person

having access thereto, except Counsel may retain, under the continuing strictures of this Protective Order, two copies of pleadings (one of which may be in electronic format) prepared in whole or in part by that party that contain Confidential Information, and one copy of orders issued by the Commission or Bureau that contain Confidential Information. All Counsel shall certify compliance with these terms and shall deliver such certification to Counsel for the Submitting Party not more than three weeks after conclusion of this proceeding. The provisions of this paragraph regarding retention of Stamped Confidential Documents and copies of the same and Confidential Information shall not be construed to apply to the Commission or its staff.

18. *Authority.* This Protective Order is issued pursuant to Sections 4(i), 4(j) and 403 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 154(j) and 403, Section 4 of the Freedom of Information Act, 5 U.S.C. § 552(b)(4), and authority delegated under Sections 0.91 and 0.291 of the Commission's Rules, 47 C.F.R. §§ 0.91, 0.291,⁶ and is effective upon its adoption.

FEDERAL COMMUNICATIONS COMMISSION

Julie A. Veach
Chief
Wireline Competition Bureau

⁶ 47 U.S.C. § 155(c).

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 ___ day of _____, 2013/2014.

[Name]
[Position]
[Firm]
[Telephone]

Collins Declaration

Exhibit 2

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*ADMITTED IN DC ONLY

August 22, 2014

Via ECFS

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

Re: **REDACTED - FOR PUBLIC INSPECTION**
**WC Docket No. 12-375, Global Tel*Link Corporation Response to One-Time
Mandatory Data Collection**

Dear Secretary Dortch:

Global Tel*Link Corporation (“GTL”),¹ by its attorneys, respectfully submits its response to the one-time mandatory data collection adopted by the Federal Communications Commission (“Commission”) in its *ICS Order*.² As required by the Instructions for Inmate Calling Services Mandatory Data Collection, GTL provides its data and supporting documents in accordance with the requirements of the *Protective Order* adopted in this proceeding.³ Specifically, GTL

¹ The Instructions for Inmate Calling Services Mandatory Data Collection require data to be filed at the holding company level. Accordingly, this response is being filed by GTL on behalf of itself and its wholly owned subsidiaries that also provide inmate calling services: DSI-ITI, LLC, Public Communications Services, Inc., and Value-Added Communications, Inc.

² *Rates for Interstate Inmate Calling Services*, 28 FCC Rcd 14107 (2013) (“*ICS Order*”), *pets. for review pending sub nom. Securus Technologies, Inc. v. FCC*, No. 13-1280 (D.C. Cir. filed Nov. 14, 2013).

³ *Rates for Interstate Inmate Calling Services*, 28 FCC Rcd 16954 (2013) (“*Protective Order*”).

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provides a REDACTED version of its response via ECFS, and a CONFIDENTIAL version of its response in hard copy to the Secretary's Office.⁴

Under the *Protective Order*, "Confidential Information" is "information that is not otherwise available from publicly available sources and that is subject to protection under the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, and the Commission's implementing rules."⁵ The *Protective Order* states that a party "designating documents and information as Confidential" pursuant to the *Protective Order* "will be deemed to have submitted a request that the material not be made routinely available for public inspection under the Commission's rules."⁶

FOIA specifically exempts from disclosure "trade secrets and commercial or financial information obtained from a person and privileged or confidential" information.⁷ Similarly, the Commission's rules state that such information is not routinely available for public inspection.⁸ The Commission's rules also allow parties to seek protection for information that is "commercial or financial, or contains a trade secret or is privileged" or when "disclosure of the information could result in substantial competitive harm."⁹

GTL has designated the following information as Confidential Information under the *Protective Order*: information concerning its costs of providing inmate calling services, its revenue-producing minutes of use, its costs of ancillary services and fees, and certain portions of its Description & Justification prepared by Economists, Inc. The Commission previously has found financial information and corporate operating expenses should be withheld from disclosure "because this material is competitively sensitive and therefore confidential" under FOIA.¹⁰ Similarly, the Commission consistently has held "revenue information to be the type of competitively sensitive material that should be withheld under" FOIA.¹¹ Information concerning "business operations and plans" also has been withheld as disclosure could damage a company's "competitive position by giving the competitors insight into [the company]'s business methods

⁴ GTL reserves all rights and no waiver of rights should be inferred, nor should the rendering of this response be considered an abandonment of GTL's right to challenge the Commission's jurisdiction over ancillary fees or intrastate inmate calling services.

⁵ *Protective Order* ¶ 2.

⁶ *Protective Order* ¶ 3 (citing 47 C.F.R. §§ 0.459(a), 0.459(a)(3)).

⁷ 5 U.S.C. § 552(b)(4).

⁸ 47 C.F.R. § 0.457(d).

⁹ 47 C.F.R. §§ 0.459(b)(3), 0.459(b)(5).

¹⁰ *Sandwich Isles Communications, Inc. on Request for Inspection of Records*, 28 FCC Rcd 15253, ¶ 7 (2013).

¹¹ *The Consumer Law Group*, 28 FCC Rcd 684, ¶ 6 (2013); *see also The Lakin Law Firm, P.C.*, 19 FCC Rcd 12727 ¶ 6 (2004); FOIA Control No. 2002-268, Letter from Joseph T. Hall to Fred B. Campbell, Harris Wiltshire & Grannis (July 8, 2002); FOIA Control No. 2002-351, Letter from Joseph T. Hall to Roy Thompson, Black Radio Network (Aug. 19, 2002); *John E. Wall, Jr.*, 22 FCC Rcd 2561 (2007).

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and strategies.”¹² Cost support data, including “disaggregated cost data” that “have the potential of revealing [a company]’s market plans and positions” or “provide insight into [a company]’s business strategies,” also has been deemed exempt from mandatory public disclosure.¹³ Accordingly, the information designated by GTL as Confidential Information herein is the type of material routinely protected from disclosure under FOIA and the Commission’s rules.

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

Respectfully submitted,



Chérie R. Kiser

Counsel for Global Tel*Link Corporation

Enclosure

¹² *Josh Wein, Warren Communications News on Request for Inspection of Records*, 24 FCC Rcd 12347, ¶ 13 (2009).

¹³ *Local Exchange Carriers’ Rates, Terms, and Conditions for Expanded Interconnection through Virtual Collocation for Special Access and Switched Transport*, 13 FCC Rcd 13354, ¶ 9 (1998); see also *Jonathan E. Canis, Frank W. Krogh, Richard J. Metzger*, 9 FCC Rcd 6495 (1994).

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HOLDING COMPANY NAME: Global Tel*Link Corporation
 FILING DATE: 8/22/2014

DEBIT CALLS

TOTAL ICS INFORMATION

2012											
ALL ICS OPERATIONS		Total Costs	Telecom Costs	Equip Costs	Security Costs	Other	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls
TOTAL ICS							60,876,130		0	71,369,257	0
TOTAL ICS DIRECT COSTS											
TOTAL ICS COMMON COSTS											

JAIL ICS INFORMATION BY CONTRACT SIZE

2012											
ALL JAIL ICS OPERATIONS											
Contract Size (Avg Daily Population)	Number of Facilities	Telecom Costs	Equip Costs	Security Costs	Other	Jurisdiction	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls
0-99	248	DIRECT				Local	247,232		0	233,709	0
		COMMON				State Intra-LATA	139,926		0	93,688	0
						State Inter-LATA	138,650		0	28,682	0
100-349	268	DIRECT				Local	1,232,463		0	8,620	0
		COMMON				State Intra-LATA	686,156		0	1,784,730	0
						State Inter-LATA	689,708		0	447,278	0
350-999	258	DIRECT				Local	3,148,496		0	4,641,705	0
		COMMON				State Intra-LATA	1,728,426		0	1,223,366	0
						State Inter-LATA	1,761,955		0	551,718	0
1000 & Over	561	DIRECT				Local	10,492,077		0	8,478,888	0
		COMMON				State Intra-LATA	5,926,443		0	2,166,295	0
						State Inter-LATA	5,871,553		0	772,749	0
						International	2,779,746		0	1,288,492	0
						International	591,915		0	294,272	0

PRISON ICS INFORMATION BY CONTRACT SIZE

2012											
ALL PRISON ICS OPERATIONS											
Contract Size (Avg Daily Population)	Number of Facilities	Telecom Costs	Equip Costs	Security Costs	Other	Jurisdiction	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls
1-4999	51	DIRECT				Local	160,031		0	932,348	0
		COMMON				State Intra-LATA	90,393		0	733,396	0
						State Inter-LATA	89,556		0	6,192	0
5000 - 19,999	300	DIRECT				Local	2,750,928		0	220,425	0
		COMMON				State Intra-LATA	1,553,860		0	1,047	0
						State Inter-LATA	1,539,468		0	2,561,777	0
20,000 & Over	638	DIRECT				Local	6,858,145		0	4,118,567	0
		COMMON				State Intra-LATA	3,873,819		0	13,199,266	0
						State Inter-LATA	3,837,940		0	4,115,767	0
						International	1,816,981		0	6,441,241	0
						International	386,905		0	824,697	0
						International			0	24,081	0

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HOLDING COMPANY NAME: Global Tel*Link Corporation
 FILING DATE: 8/22/2014

DEBIT CALLS

TOTAL ICS INFORMATION

2013									
Total Costs	Telecom Costs	Equip Costs	Security Costs	Other	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls
						64,656,138		0	67,574,840

2013										
Number of Facilities	Telecom Costs	Equip Costs	Security Costs	Other	Jurisdiction	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls
	174	DIRECT				Local	241,423		0	228,515
COMMON					State Intra-LATA	129,264		0	102,498	0
					State Inter-LATA	132,400		0	23,787	0
					Interstate	64,186		0	36,198	0
244	DIRECT				International	13,888		0	16,861	0
	COMMON				Local	1,244,029		0	1,717,659	0
					State Intra-LATA	666,185		0	447,041	0
					State Inter-LATA	680,904		0	263,290	0
245	DIRECT				Interstate	330,745		0	1,216,309	0
	COMMON				International	71,563		0	240,021	0
					Local	3,409,345		0	4,747,797	0
					State Intra-LATA	1,825,725		0	1,198,401	0
550	DIRECT				State Inter-LATA	1,866,064		0	524,541	0
	COMMON				Interstate	906,430		0	1,215,648	0
					International	196,121		0	231,671	0
					Local	11,166,688		0	8,277,008	0
665	DIRECT				State Intra-LATA	5,979,850		0	1,965,991	0
	COMMON				State Inter-LATA	6,111,952		0	797,514	0
					Interstate	2,968,845		0	1,239,781	0
					International	642,369		0	355,402	0

2013										
Number of Facilities	Telecom Costs	Equip Costs	Security Costs	Other	Jurisdiction	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls
	49	DIRECT				Local	132,497		0	938,265
COMMON					State Intra-LATA	70,953		0	764,158	0
					State Inter-LATA	72,521		0	8,635	0
					Interstate	35,226		0	201,065	0
286	DIRECT				International	7,622		0	1,055	0
	COMMON				Local	2,748,284		0	4,791,588	0
					State Intra-LATA	1,471,723		0	2,471,889	0
					State Inter-LATA	1,504,240		0	2,033,514	0
665	DIRECT				Interstate	740,676		0	788,225	0
	COMMON				International	189,056		0	12,116	0
					Local	7,927,977		0	18,082,940	0
					State Intra-LATA	4,245,480		0	4,454,233	0
665	DIRECT				State Inter-LATA	4,339,282		0	7,103,680	0
	COMMON				Interstate	2,107,781		0	1,048,850	0
					International	456,060		0	30,694	0

HOLDING COMPANY NAME: Global Tel*Link Corporation

FILING DATE: 8/22/2014

DEBIT CALLS

TOTAL ICS INFORMATION

2014 (Annualized)									
Total Costs	Telecom Costs	Equip Costs	Security Costs	Other	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls
					63,601,317		0	76,039,049	0

2014													
Number of Facilities		Telecom Costs				Security Costs	Other	Jurisdiction	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls
		Equip Costs	Security Costs	Other	Jurisdiction								
138	DIRECT							205,964				197,374	0
	COMMON							110,996				60,074	0
								119,203				27,437	0
226	DIRECT							55,220				35,338	0
	COMMON							10,871				3,931	0
								1,206,328				1,977,660	0
229	DIRECT							651,181				563,988	0
	COMMON							699,326				348,214	0
								323,957				1,484,962	0
531	DIRECT							63,777				278,854	0
	COMMON							3,128,001				4,799,609	0
								1,685,712				1,214,398	0
229	DIRECT							1,810,346				596,561	0
	COMMON							838,637				1,388,599	0
								165,101				135,540	0
531	DIRECT							10,761,691				11,659,378	0
	COMMON							5,801,176				2,410,450	0
								6,230,089				907,680	0
261	DIRECT							2,886,034				2,043,151	0
	COMMON							568,174				467,105	0
								284,718				1,172,405	0
54	DIRECT							153,437				843,418	0
	COMMON							164,782				63,595	0
								76,334				355,097	0
261	DIRECT							15,028				1,987	0
	COMMON							2,561,413				4,820,885	0
								1,380,372				2,346,276	0
645	DIRECT							1,482,430				2,176,147	0
	COMMON							686,733				873,670	0
								135,155				12,420	0
645	DIRECT							7,926,550				19,099,162	0
	COMMON							4,272,777				4,750,003	0
								4,586,687				7,473,626	0
261	DIRECT							2,125,669				1,428,084	0
	COMMON							418,481				32,974	0
								284,718				1,172,405	0

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HOLDING COMPANY NAME: Global Tel*Link Corporation
 FILING DATE: 8/22/2014

PREPAID CALLS

TOTAL ICS INFORMATION

All ICS OPERATIONS	2012									
	Total Costs	Telecom Costs	Equip Costs	Security Costs	Other	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls
TOTAL ICS						130,662,774		0	88,686,004	0
TOTAL ICS DIRECT COSTS										
TOTAL ICS COMMON COSTS										

JAIL ICS INFORMATION BY CONTRACT SIZE

ALL JAIL ICS OPERATIONS	2012											
	Contract Size (Avg Daily Population)	Number of Facilities	Telecom Costs	Equip Costs	Security Costs	Other	Jurisdiction	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls
0-99	248	DIRECT					Local	566,906		0	586,436	0
		COMMON					State Intra-LATA	361,654		0	375,374	0
100-349	268	DIRECT					State Inter-LATA	250,888		0	89,980	0
		COMMON					Interstate	119,602		0	57,339	0
350-999	258	DIRECT					International	1,805		0	365	0
		COMMON					Local	2,818,463		0	2,538,567	0
1000 & Over	561	DIRECT					State Intra-LATA	1,799,290		0	1,077,214	0
		COMMON					State Inter-LATA	1,248,212		0	463,701	0
		DIRECT					International	595,040		0	213,610	0
		COMMON					Local	8,979		0	4,048	0
		DIRECT					State Intra-LATA	7,200,153		0	7,709,110	0
		COMMON					State Inter-LATA	4,596,534		0	2,090,901	0
		DIRECT					Interstate	3,188,730		0	71,742	0
		COMMON					International	1,520,112		0	685,285	0
		DIRECT					Local	22,938		0	4,595	0
		COMMON					State Intra-LATA	23,993,853		0	27,502,936	0
		DIRECT					State Inter-LATA	15,317,531		0	7,624,603	0
		COMMON					Interstate	10,626,151		0	1,525,764	0
		DIRECT					International	5,065,635		0	1,510,693	0
		COMMON					Local	76,437		0	9,885	0

PRISON ICS INFORMATION BY CONTRACT SIZE

All PRISON ICS OPERATIONS	2012											
	Contract Size (Avg Daily Population)	Number of Facilities	Telecom Costs	Equip Costs	Security Costs	Other	Jurisdiction	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls
1-4999	51	DIRECT					Local	365,967		0	446,609	0
		COMMON					State Intra-LATA	233,631		0	211,476	0
5000-19,999	300	DIRECT					State Inter-LATA	162,076		0	3,656	0
		COMMON					Interstate	77,264		0	63,902	0
20,000 & Over	638	DIRECT					International	1,166		0	186	0
		COMMON					Local	6,290,973		0	2,123,013	0
		DIRECT					State Intra-LATA	4,016,119		0	3,626,193	0
		COMMON					State Inter-LATA	2,786,081		0	1,749,707	0
		DIRECT					Interstate	1,328,164		0	2,302,119	0
		COMMON					International	20,041		0	1,832	0
		DIRECT					Local	15,883,579		0	5,967,203	0
		COMMON					State Intra-LATA	10,012,302		0	5,021,385	0
		DIRECT					State Inter-LATA	6,945,782		0	11,086,993	0
		COMMON					Interstate	3,311,152		0	1,675,230	0
		DIRECT					International	49,963		0	10,352	0
		COMMON					Local			0		

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HOLDING COMPANY NAME: Global Tel*Link Corporation
 FILING DATE: 8/22/2014

PREPAID CALLS

TOTAL ICS INFORMATION

2013							
	Telecom Costs	Equip Costs	Security Costs	Other	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU
Total Costs					148,423,804		0
							106,259,412
							0

2013							
Number of Facilities	Telecom Costs	Equip Costs	Security Costs	Other	Jurisdiction	Commissions Paid	Revenue Producing MOU
174	DIRECT				Local	547,361	0
					State Intra-LATA	343,071	679,108
	COMMON				State Inter-LATA	311,864	0
244	DIRECT				Interstate	1,301,119	0
					Interstate	1,140	90,715
	COMMON				International	2,820,497	665
245	DIRECT				Local	1,767,811	0
					State Intra-LATA	1,607,002	1,346,511
	COMMON				State Inter-LATA	670,489	496,542
550	DIRECT				Interstate	5,874	0
					Interstate	7,729,760	207,613
	COMMON				International	4,844,805	3,334
245	DIRECT				Local	4,404,096	0
					State Intra-LATA	1,837,519	7,877,485
	COMMON				State Inter-LATA	16,099	1,910,147
550	DIRECT				Local	25,317,422	0
					State Intra-LATA	15,868,276	28,108,898
	COMMON				State Inter-LATA	14,424,815	6,998,004
245	DIRECT				Interstate	6,018,460	0
					Interstate	5,874	1,889,810
	COMMON				International	52,729	1,889,810
245	DIRECT				Local	7,729,760	0
					State Intra-LATA	4,844,805	7,877,485
	COMMON				State Inter-LATA	1,837,519	1,910,147
550	DIRECT				Local	16,099	0
					State Intra-LATA	25,317,422	743,329
	COMMON				State Inter-LATA	14,424,815	4,043
245	DIRECT				Local	15,868,276	0
					State Intra-LATA	14,424,815	28,108,898
	COMMON				State Inter-LATA	6,018,460	6,998,004
245	DIRECT				Interstate	5,874	0
					Interstate	7,729,760	1,889,810
	COMMON				International	4,844,805	1,889,810
245	DIRECT				Local	4,844,805	0
					State Intra-LATA	1,837,519	7,877,485
	COMMON				State Inter-LATA	16,099	1,910,147
550	DIRECT				Local	25,317,422	0
					State Intra-LATA	15,868,276	28,108,898
	COMMON				State Inter-LATA	14,424,815	6,998,004
245	DIRECT				Interstate	6,018,460	0
					Interstate	5,874	1,889,810
	COMMON				International	52,729	1,889,810
245	DIRECT				Local	7,729,760	0
					State Intra-LATA	4,844,805	7,877,485
	COMMON				State Inter-LATA	1,837,519	1,910,147
550	DIRECT				Local	16,099	0
					State Intra-LATA	25,317,422	28,108,898
	COMMON				State Inter-LATA	14,424,815	6,998,004
245	DIRECT				Interstate	6,018,460	0
					Interstate	7,729,760	1,889,810
	COMMON				International	4,844,805	1,889,810
245	DIRECT				Local	4,844,805	0
					State Intra-LATA	1,837,519	7,877,485
	COMMON				State Inter-LATA	16,099	1,910,147
550	DIRECT				Local	25,317,422	0
					State Intra-LATA	15,868,276	28,108,898
	COMMON				State Inter-LATA	14,424,815	6,998,004
245	DIRECT				Interstate	6,018,460	0
					Interstate	7,729,760	1,889,810
	COMMON				International	4,844,805	1,889,810
245	DIRECT				Local	7,729,760	0
					State Intra-LATA	4,844,805	7,877,485
	COMMON				State Inter-LATA	1,837,519	1,910,147
550	DIRECT				Local	16,099	0
					State Intra-LATA	25,317,422	28,108,898
	COMMON				State Inter-LATA	14,424,815	6,998,004
245	DIRECT				Interstate	6,018,460	0
					Interstate	7,729,760	1,889,810
	COMMON				International	4,844,805	1,889,810
245	DIRECT				Local	4,844,805	0
					State Intra-LATA	1,837,519	7,877,485
	COMMON				State Inter-LATA	16,099	1,910,147
550	DIRECT				Local	25,317,422	0
					State Intra-LATA	15,868,276	28,108,898
	COMMON				State Inter-LATA	14,424,815	6,998,004
245	DIRECT				Interstate	6,018,460	0
					Interstate	7,729,760	1,889,810
	COMMON				International	4,844,805	1,889,810
245	DIRECT				Local	7,729,760	0
					State Intra-LATA	4,844,805	7,877,485
	COMMON				State Inter-LATA	1,837,519	1,910,147
550	DIRECT				Local	16,099	0
					State Intra-LATA	25,317,422	28,108,898
	COMMON				State Inter-LATA	14,424,815	6,998,004
245	DIRECT				Interstate	6,018,460	0
					Interstate	7,729,760	1,889,810
	COMMON				International	4,844,805	1,889,810
245	DIRECT				Local	4,844,805	0
					State Intra-LATA	1,837,519	7,877,485
	COMMON				State Inter-LATA	16,099	1,910,147
550	DIRECT				Local	25,317,422	0
					State Intra-LATA	15,868,276	28,108,898
	COMMON				State Inter-LATA	14,424,815	6,998,004
245	DIRECT				Interstate	6,018,460	0
					Interstate	7,729,760	1,889,810
	COMMON				International	4,844,805	1,889,810
245	DIRECT				Local	7,729,760	0
					State Intra-LATA	4,844,805	7,877,485
	COMMON				State Inter-LATA	1,837,519	1,910,147
550	DIRECT				Local	16,099	0
					State Intra-LATA	25,317,422	28,108,898
	COMMON				State Inter-LATA	14,424,815	6,998,004
245	DIRECT				Interstate	6,018,460	0
					Interstate	7,729,760	1,889,810
	COMMON				International	4,844,805	1,889,810
245	DIRECT				Local	4,844,805	0
					State Intra-LATA	1,837,519	7,877,485
	COMMON				State Inter-LATA	16,099	1,910,147
550	DIRECT				Local	25,317,422	0
					State Intra-LATA	15,868,276	28,108,898
	COMMON				State Inter-LATA	14,424,815	6,998,004
245	DIRECT				Interstate	6,018,460	0
					Interstate	7,729,760	1,889,810
	COMMON				International	4,844,805	1,889,810
245	DIRECT				Local	7,729,760	0
					State Intra-LATA	4,844,805	7,877,485
	COMMON				State Inter-LATA	1,837,519	1,910,147
550	DIRECT				Local	16,099	0
					State Intra-LATA	25,317,422	28,108,898
	COMMON				State Inter-LATA	14,424,815	6,998,004
245	DIRECT				Interstate	6,018,460	0
					Interstate	7,729,760	1,889,810
	COMMON				International	4,844,805	1,889,810
245	DIRECT				Local	4,844,805	0
					State Intra-LATA	1,837,519	7,877,485
	COMMON				State Inter-LATA	16,099	1,910,147
550	DIRECT				Local	25,317,422	0
					State Intra-LATA	15,868,276	28,108,898
	COMMON				State Inter-LATA	14,424,815	6,998,004
245	DIRECT				Interstate	6,018,460	0
					Interstate	7,729,760	1,889,810
	COMMON				International	4,844,805	1,889,810
245	DIRECT				Local	7,729,760	0
					State Intra-LATA	4,844,805	7,877,485
	COMMON				State Inter-LATA	1,837,519	1,910,147
550	DIRECT				Local	16,099	0
					State Intra-LATA	25,317,422	28,108,898
	COMMON				State Inter-LATA	14,424,815	6,998,004
245	DIRECT				Interstate	6,018,460	0
					Interstate	7,729,760	1,889,810
	COMMON				International	4,844,805	1,889,810
245	DIRECT				Local	4,844,805	0
					State Intra-LATA	1,837,519	7,877,485
	COMMON				State Inter-LATA	16,099	1,910,147
550	DIRECT				Local	25,317,422	0
					State Intra-LATA	15,868,276	28,108,898
	COMMON				State Inter-LATA	14,424,815	6,998,004
245	DIRECT				Interstate	6,018,460	0
					Interstate	7,729,760	1,889,810
	COMMON				International	4,844,805	1,889,810
245	DIRECT				Local	7,729,760	0
					State Intra-LATA	4,844,805	7,877,485
	COMMON				State Inter-LATA	1,837,519	1,910,147
550	DIRECT				Local	16,099	0
					State Intra-LATA	25,317,422	28,108,898
	COMMON				State Inter-LATA	14,424,815	6,998,004
245	DIRECT				Interstate	6,018,460	0
					Interstate	7,729,760	1,889,810
	COMMON				International	4,844,805	1,889,810
245	DIRECT				Local	4,844,805	0
					State Intra-LATA	1,837,519	7,877,485
	COMMON				State Inter-LATA	16,099	1,910,147
550	DIRECT				Local	25,317,422	0
					State Intra-LATA	15,868,276	28,108,898
	COMMON				State Inter-LATA	14,424,815	6,998,004
245	DIRECT				Interstate	6,018,460	0
					Interstate	7,729,760	1,889,810
	COMMON				International	4,844,805	1,889,810
245	DIRECT				Local	7,729,760	0
					State Intra-LATA	4,844,805	7,877,485
	COMMON				State Inter-LATA	1,837,519	1,910,147
550	DIRECT				Local	16,099	0
	</						

REDACTED - FOR PUBLIC INSPECTION

HOLDING COMPANY NAME: Global Tel*Link Corporation
 FILING DATE: 8/27/2014

PREPAID CALLS

TOTAL ICS INFORMATION

2014 (Annualized)											
Number of Facilities	DIRECT	COMMON	Telecom Costs	Equip Costs	Security Costs	Other	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls
226											
229											
531											

2014												
Number of Facilities	DIRECT	COMMON	Telecom Costs	Equip Costs	Security Costs	Other	Jurisdiction	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls
226												
229												
531												

2014												
Number of Facilities	DIRECT	COMMON	Telecom Costs	Equip Costs	Security Costs	Other	Jurisdiction	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls
261												
645												

REDACTED - FOR PUBLIC INSPECTION

HOLDING COMPANY NAME: Global Tel*Link Corporation
 FILING DATE: 8/22/2014

COLLECT CALLS

TOTAL ICS INFORMATION

2012											
ALL ICS OPERATIONS	Total Costs		Telecom Costs	Equip Costs	Security Costs	Other	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls
	TOTAL ICS DIRECT COSTS	TOTAL ICS COMMON COSTS									
	46,538,072								0	36,545,520	0

JAIL ICS INFORMATION BY CONTRACT SIZE

2012												
ALL JAIL ICS OPERATIONS	Contract Size (Avg Daily Population)	Number of Facilities	Telecom Costs	Equip Costs	Security Costs	Other	Jurisdiction	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls
100-349	268	DIRECT COMMON					Local State Intra-LATA State Inter-LATA Interstate International	542,206 553,076 884,250 319,079 5,699	0 0 0 0 0	0 0 0 0 0	391,938 170,575 96,649 55,322 2,375	0 0 0 0 0
350-999	258	DIRECT COMMON					Local State Intra-LATA State Inter-LATA Interstate International	1,385,395 1,412,909 2,258,938 815,131 14,559	0 0 0 0 0	0 0 0 0 0	1,073,891 393,865 183,582 135,267 3,549	0 0 0 0 0
1000 & Over	561	DIRECT COMMON					Local State Intra-LATA State Inter-LATA Interstate International	4,616,701 4,708,392 7,527,706 2,716,251 48,317	0 0 0 0 0	0 0 0 0 0	4,921,439 1,387,659 375,794 331,822 25,000	0 0 0 0 0

PRISON ICS INFORMATION BY CONTRACT SIZE

2012												
ALL PRISON ICS OPERATIONS	Contract Size (Avg Daily Population)	Number of Facilities	Telecom Costs	Equip Costs	Security Costs	Other	Jurisdiction	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls
5000 - 19,999	300	DIRECT COMMON					Local State Intra-LATA State Inter-LATA Interstate International	1,210,458 1,234,498 1,973,697 712,203 12,721	0 0 0 0 0	0 0 0 0 0	610,624 1,286,410 3,456,579 705,443 4,424,475	0 0 0 0 0
20,000 & Over	638	DIRECT COMMON					Local State Intra-LATA State Inter-LATA Interstate International	3,017,706 3,077,640 4,920,484 1,775,545 31,713	0 0 0 0 0	0 0 0 0 0	1,862,044 3,655,491 9,486,651 967,791 6,421	0 0 0 0 0

REDACTED - FOR PUBLIC INSPECTION

HOLDING COMPANY NAME: Global Tel*Link Corporation
 FILING DATE: 8/22/2014

COLLECT CALLS

TOTAL ICS INFORMATION

2013									
Total Costs	Telecom Costs	Equip Costs	Security Costs	Other	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls
					21,995,671		0	13,317,552	0

2013										
Number of Facilities	Telecom Costs	Equip Costs	Security Costs	Other	Jurisdiction	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls
174	DIRECT				Local	55,340		0	74,074	0
					State Intra-LATA	49,480		0	46,139	0
	COMMON				State Inter-LATA	66,234		0	7,688	0
					Interstate	25,986		0	7,819	0
244	DIRECT				International	586		0	64	0
					Local	285,169		0	219,986	0
	COMMON				State Intra-LATA	254,965		0	120,371	0
					State Inter-LATA	941,297		0	54,094	0
245	DIRECT				Interstate	133,904		0	26,397	0
	COMMON				International	3,022		0	1,321	0
					Local	781,499		0	612,941	0
					State Intra-LATA	698,748		0	273,311	0
550	DIRECT				State Inter-LATA	935,349		0	96,869	0
	COMMON				Interstate	366,974		0	68,303	0
					International	8,281		0	710	0
					Local	2,559,657		0	2,839,274	0
665	DIRECT				State Intra-LATA	2,288,620		0	822,466	0
	COMMON				State Inter-LATA	3,063,564		0	210,413	0
					Interstate	1,201,957		0	207,534	0
					International	27,124		0	22,072	0

2013										
Number of Facilities	Telecom Costs	Equip Costs	Security Costs	Other	Jurisdiction	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls
49	DIRECT				Local	30,371		0	73,437	0
					State Intra-LATA	27,155		0	81,102	0
	COMMON				State Inter-LATA	36,350		0	8,929	0
					Interstate	14,262		0	10,039	0
286	DIRECT				International	322		0	169	0
	COMMON				Local	629,969		0	251,084	0
					State Intra-LATA	563,263		0	666,697	0
					State Inter-LATA	753,988		0	431,587	0
665	DIRECT				Interstate	295,819		0	137,629	0
	COMMON				International	6,676		0	2,933	0
					Local	1,817,271		0	595,199	0
					State Intra-LATA	1,624,844		0	1,297,539	0
665	DIRECT				State Inter-LATA	2,175,028		0	3,631,272	0
	COMMON				Interstate	853,349		0	412,582	0
					International	19,257		0	5,788	0
					Local	2,288,620		0	822,466	0

REDACTED - FOR PUBLIC INSPECTION

HOLDING COMPANY NAME: Global Tel*Link Corporation

FILING DATE: 8/22/2014

COLLECT CALLS

TOTAL ICS INFORMATION

2014 (Annualized)							
Total Costs	Telecom Costs	Equip Costs	Security Costs	Other	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU
					14,624,860		0
							10,239,907
							0

2014							
Number of Facilities	Telecom Costs	Equip Costs	Security Costs	Other	Jurisdiction	Commissions Paid	Revenue Producing MOU
138	DIRECT				Local	33,513	0
					State Intra-LATA	29,542	0
	COMMON				State Inter-LATA	41,122	0
226	DIRECT				Interstate	11,049	0
					International	264	0
	COMMON				Local	896,615	0
229	DIRECT				State Intra-LATA	173,316	0
					State Inter-LATA	241,290	0
	COMMON				Interstate	64,824	0
531	DIRECT				International	1,549	0
					Local	508,971	0
	COMMON				State Intra-LATA	448,663	0
531	DIRECT				State Inter-LATA	624,524	0
					Interstate	167,810	0
	COMMON				International	4,009	0
531	DIRECT				Local	1,751,564	0
					State Intra-LATA	1,544,021	0
	COMMON				State Inter-LATA	2,149,226	0
531	DIRECT				Interstate	577,498	0
					International	137,937	0
	COMMON				Local	471,530	0
531	DIRECT				State Intra-LATA	315,720	0
					State Inter-LATA	86,520	0
	COMMON				Interstate	61,130	0
531	DIRECT				International	562	0
					Local	2,085,602	0
	COMMON				State Intra-LATA	666,180	0
531	DIRECT				State Inter-LATA	149,455	0
					Interstate	183,214	0
	COMMON				International	10,853	0

2014							
Number of Facilities	Telecom Costs	Equip Costs	Security Costs	Other	Jurisdiction	Commissions Paid	Revenue Producing MOU
54	DIRECT				Local	463,326	0
					State Intra-LATA	40,838	0
	COMMON				State Inter-LATA	56,846	0
261	DIRECT				Interstate	15,274	0
					International	365	0
	COMMON				Local	416,779	0
645	DIRECT				State Intra-LATA	367,395	0
					State Inter-LATA	511,402	0
	COMMON				Interstate	137,414	0
645	DIRECT				International	3,283	0
					Local	1,280,090	0
	COMMON				State Intra-LATA	1,137,228	0
645	DIRECT				State Inter-LATA	1,582,983	0
					Interstate	465,346	0
	COMMON				International	101,162	0
645	DIRECT				Local	403,195	0
					State Intra-LATA	992,954	0
	COMMON				State Inter-LATA	2,822,837	0
645	DIRECT				Interstate	560,986	0
					International	3,861	0
	COMMON				Local	76,192	0
645	DIRECT				State Intra-LATA	60,732	0
					State Inter-LATA	26,798	0
	COMMON				Interstate	16,286	0
645	DIRECT				International	115	0
					Local	143,453	0
	COMMON				State Intra-LATA	421,068	0
645	DIRECT				State Inter-LATA	345,673	0
					Interstate	116,669	0
	COMMON				International	1,418	0
645	DIRECT				Local	403,195	0
					State Intra-LATA	992,954	0
	COMMON				State Inter-LATA	2,822,837	0
645	DIRECT				Interstate	560,986	0
					International	3,861	0
	COMMON				Local	76,192	0
645	DIRECT				State Intra-LATA	60,732	0
					State Inter-LATA	26,798	0
	COMMON				Interstate	16,286	0
645	DIRECT				International	115	0
					Local	143,453	0
	COMMON				State Intra-LATA	421,068	0
645	DIRECT				State Inter-LATA	345,673	0
					Interstate	116,669	0
	COMMON				International	1,418	0
645	DIRECT				Local	403,195	0
					State Intra-LATA	992,954	0
	COMMON				State Inter-LATA	2,822,837	0
645	DIRECT				Interstate	560,986	0
					International	3,861	0
	COMMON				Local	76,192	0
645	DIRECT				State Intra-LATA	60,732	0
					State Inter-LATA	26,798	0
	COMMON				Interstate	16,286	0
645	DIRECT				International	115	0
					Local	143,453	0
	COMMON				State Intra-LATA	421,068	0
645	DIRECT				State Inter-LATA	345,673	0
					Interstate	116,669	0
	COMMON				International	1,418	0
645	DIRECT				Local	403,195	0
					State Intra-LATA	992,954	0
	COMMON				State Inter-LATA	2,822,837	0
645	DIRECT				Interstate	560,986	0
					International	3,861	0
	COMMON				Local	76,192	0
645	DIRECT				State Intra-LATA	60,732	0
					State Inter-LATA	26,798	0
	COMMON				Interstate	16,286	0
645	DIRECT				International	115	0
					Local	143,453	0
	COMMON				State Intra-LATA	421,068	0
645	DIRECT				State Inter-LATA	345,673	0
					Interstate	116,669	0
	COMMON				International	1,418	0
645	DIRECT				Local	403,195	0
					State Intra-LATA	992,954	0
	COMMON				State Inter-LATA	2,822,837	0
645	DIRECT				Interstate	560,986	0
					International	3,861	0
	COMMON				Local	76,192	0
645	DIRECT				State Intra-LATA	60,732	0
					State Inter-LATA	26,798	0
	COMMON				Interstate	16,286	0
645	DIRECT				International	115	0
					Local	143,453	0
	COMMON				State Intra-LATA	421,068	0
645	DIRECT				State Inter-LATA	345,673	0
					Interstate	116,669	0
	COMMON				International	1,418	0
645	DIRECT				Local	403,195	0
					State Intra-LATA	992,954	0
	COMMON				State Inter-LATA	2,822,837	0
645	DIRECT				Interstate	560,986	0
					International	3,861	0
	COMMON				Local	76,192	0
645	DIRECT				State Intra-LATA	60,732	0
					State Inter-LATA	26,798	0
	COMMON				Interstate	16,286	0
645	DIRECT				International	115	0
					Local	143,453	0
	COMMON				State Intra-LATA	421,068	0
645	DIRECT				State Inter-LATA	345,673	0
					Interstate	116,669	0
	COMMON				International	1,418	0
645	DIRECT				Local	403,195	0
					State Intra-LATA	992,954	0
	COMMON				State Inter-LATA	2,822,837	0
645	DIRECT				Interstate	560,986	0
					International	3,861	0
	COMMON				Local	76,192	0
645	DIRECT				State Intra-LATA	60,732	0
					State Inter-LATA	26,798	0
	COMMON				Interstate	16,286	0
645	DIRECT				International	115	0
					Local	143,453	0
	COMMON				State Intra-LATA	421,068	0
645	DIRECT				State Inter-LATA	345,673	0
					Interstate	116,669	0
	COMMON				International	1,418	0
645	DIRECT				Local	403,195	0
					State Intra-LATA	992,954	0
	COMMON				State Inter-LATA	2,822,837	0
645	DIRECT				Interstate	560,986	0
					International	3,861	0
	COMMON				Local	76,192	0
645	DIRECT				State Intra-LATA	60,732	0
					State Inter-LATA	26,798	0
	COMMON				Interstate	16,286	0
645	DIRECT				International	115	0
					Local	143,453	0
	COMMON				State Intra-LATA	421,068	0
645	DIRECT				State Inter-LATA	345,673	0
					Interstate	116,669	0
	COMMON				International	1,418	0
645	DIRECT				Local	403,195	0
					State Intra-LATA	992,954	0
	COMMON				State Inter-LATA	2,822,837	0
645	DIRECT				Interstate	560,986	0
					International	3,861	0
	COMMON				Local	76,192	0
645	DIRECT				State Intra-LATA	60,732	0
					State Inter-LATA	26,798	0
	COMMON				Interstate	16,286	0
645	DIRECT				International	115	0
					Local	143,453	0
	COMMON				State Intra-LATA	421,068	0
645	DIRECT				State Inter-LATA	345,673	0
					Interstate	116,669	0
	COMMON				International	1,418	0
645	DIRECT				Local	403,195	0
					State Intra-LATA	992,954	0
	COMMON				State Inter-LATA	2,822,837	0
645	DIRECT				Interstate	560,986	0
					International	3,861	0
	COMMON				Local	76,192	0
645	DIRECT				State Intra-LATA	60,732	0
					State Inter-LATA	26,798	0
	COMMON				Interstate	16,286	

HOLDING COMPANY NAME: Global Tel*Link Corporation
 FILING DATE: 8/22/2014

OTHER INMATE CALLING SERVICES

TOTAL ICS INFORMATION

2012										
ALL ICS OPERATIONS	Total Costs	Telecom Costs	Equip Costs	Security Costs	Other	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls
TOTAL ICS						0		107,206,374	0	30,188,048
TOTAL ICS DIRECT COSTS										
TOTAL ICS COMMON COSTS										

JAIL ICS INFORMATION BY CONTRACT SIZE

2012												
ALL JAIL ICS OPERATIONS	Contract Size (Avg Daily Population)	Number of Facilities	Telecom Costs	Equip Costs	Security Costs	Other	Jurisdiction	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls
0-99	DIRECT	248					Local	0		n/a	0	n/a
	COMMON						State Intra-LATA State Inter-LATA Interstate International	0		n/a	0	n/a
100-349	DIRECT	268					Local	0		n/a	0	n/a
	COMMON						State Intra-LATA State Inter-LATA Interstate International	0		n/a	0	n/a
350-999	DIRECT	258					Local	0		n/a	0	n/a
	COMMON						State Intra-LATA State Inter-LATA Interstate International	0		n/a	0	n/a
1000 & Over	DIRECT	561					Local	0		n/a	0	n/a
	COMMON						State Intra-LATA State Inter-LATA Interstate International	0		n/a	0	n/a

PRISON ICS INFORMATION BY CONTRACT SIZE

2012												
ALL PRISON ICS OPERATIONS	Contract Size (Avg Daily Population)	Number of Facilities	Telecom Costs	Equip Costs	Security Costs	Other	Jurisdiction	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls
1-4999	DIRECT	51					Local	0		n/a	0	n/a
	COMMON						State Intra-LATA State Inter-LATA Interstate International	0		n/a	0	n/a
5000 - 19,999	DIRECT	300					Local	0		n/a	0	n/a
	COMMON						State Intra-LATA State Inter-LATA Interstate International	0		n/a	0	n/a
20,000 & Over	DIRECT	638					Local	0		n/a	0	n/a
	COMMON						State Intra-LATA State Inter-LATA Interstate International	0		n/a	0	n/a

HOLDING COMPANY NAME: Global Tel*Link Corporation
 FILING DATE: 8/22/2014

OTHER INMATE CALLING SERVICES

TOTAL ICS INFORMATION

2013									
Total Costs	Telecom Costs	Equip Costs	Security Costs	Other	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls
					0	102,023,083		0	27,731,549

2013													
Number of Facilities		Telecom Costs			Security Costs			Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls	
		Equip Costs	Other	Jurisdiction	Local	State Intra-LATA	State Inter-LATA						Interstate
174	DIRECT						0	0	n/a	0	n/a	0	n/a
	COMMON						0	0	n/a	0	n/a	0	n/a
244	DIRECT						0	0	n/a	0	n/a	0	n/a
	COMMON						0	0	n/a	0	n/a	0	n/a
245	DIRECT						0	0	n/a	0	n/a	0	n/a
	COMMON						0	0	n/a	0	n/a	0	n/a
550	DIRECT						0	0	n/a	0	n/a	0	n/a
	COMMON						0	0	n/a	0	n/a	0	n/a

2013													
Number of Facilities		Telecom Costs			Security Costs			Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls	
		Equip Costs	Other	Jurisdiction	Local	State Intra-LATA	State Inter-LATA						Interstate
49	DIRECT						0	0	n/a	0	n/a	0	n/a
	COMMON						0	0	n/a	0	n/a	0	n/a
286	DIRECT						0	0	n/a	0	n/a	0	n/a
	COMMON						0	0	n/a	0	n/a	0	n/a
665	DIRECT						0	0	n/a	0	n/a	0	n/a
	COMMON						0	0	n/a	0	n/a	0	n/a

HOLDING COMPANY NAME: Global Tel*Link Corporation
 FILING DATE: 8/22/2014

OTHER INMATE CALLING SERVICES

TOTAL ICS INFORMATION

2014 (Annualized)						
	Telecom Costs	Equip Costs	Security Costs	Other	Commissions Paid	Revenue Producing MOU
Total Costs					0	87,295,766
						0
						21,448,917

2014						
Number of Facilities	Telecom Costs	Equip Costs	Security Costs	Other	Jurisdiction	Commissions Paid
138	DIRECT				Local	0
					State Intra-LATA	0
	COMMON				State Inter-LATA	0
226	DIRECT				Interstate	0
					International	0
	COMMON				Local	0
229	DIRECT				State Intra-LATA	0
					State Inter-LATA	0
	COMMON				Interstate	0
531	DIRECT				Local	0
					State Intra-LATA	0
	COMMON				State Inter-LATA	0

2014						
Number of Facilities	Telecom Costs	Equip Costs	Security Costs	Other	Jurisdiction	Commissions Paid
54	DIRECT				Local	0
					State Intra-LATA	0
	COMMON				State Inter-LATA	0
261	DIRECT				Interstate	0
					International	0
	COMMON				Local	0
645	DIRECT				State Intra-LATA	0
					State Inter-LATA	0
	COMMON				Interstate	0

REDACTED - FOR PUBLIC INSPECTION

HOLDING COMPANY NAME: Global TollLink Corporation

PLANS DATE: 6/22/2014

ANCILLARY FEES

		2014		Demand		Direct Costs		Common Costs	
		TOTAL ANCILLARY FEES		n/a					
TOTAL									
CS Ancillary Charges									
BY FEE									
Fee Disadv plan	State	Applies to Just (J), State (S), and Both (B)	Recurring Charge	Non-Recurring Charge	Demand	Direct Costs	Common Costs		
Fee at LSP Admin fee for LECB - 50.05 - \$1.00 per month	AL, AR, AZ, CA, CO, DE, FL, GA, IA, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MP, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY	B	Y		211.34E				
Monthly bill statement fee - \$1.50 - \$5.00 per month	AL, AR, AZ, CA, CO, DE, FL, GA, IA, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MP, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY	B							
State regulatory Cost Recovery fee for LECB bed calls - 355.85E	AL, AR, AZ, CA, CO, DE, FL, GA, IA, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MP, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY	B	Y		822.92E				
State LSP Admin fee for LECB Bed Calls - 355.85E	AL, AR, AZ, CA, CO, DE, FL, GA, IA, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MP, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY	B	Y		355.85E				
	UT	B	Y		195.847				
Per call admin fee at toll free - Tennessee - 50.15 to call	AL, AR, AZ, CA, CO, DE, FL, GA, IA, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MP, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY	B		Y	3,049.95E				
Per call fee if accessing fee in determination of State LSP - 11,408.02E	AL, AR, AZ, CA, CO, DE, FL, GA, IA, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MP, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY	B		Y	11,408.02E				
Fee at LSP Admin fee for non-LEC B - 3,419.05E	AL, AR, AZ, CA, CO, DE, FL, GA, IA, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MP, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY	B		Y	3,419.05E				
State regulatory Cost Recovery fee for non-LEC B bed calls - 29,077.28E	AL, AR, AZ, CA, CO, DE, FL, GA, IA, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MP, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY	B	Y		29,077.28E				
When admin fee at toll free - 11,551.04E	AL, AR, AZ, CA, CO, DE, FL, GA, IA, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MP, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY	B		Y	11,551.04E				
Account close-out fee - 215.62E	AL, AR, AZ, CA, CO, DE, FL, GA, IA, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MP, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY	B		Y	215.62E				
Cost fee data back fee - 55E	WI, WV, WY	B							
Minimum payment fee - 55E	AL, AR, AZ, CA, CO, DE, FL, GA, IA, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MP, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY	B		Y	76.67E				

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Rates for Interstate Inmate Calling Services) WC Docket No. 12-375
)

**FCC Mandatory Data Collection
Description & Justification for Global Tel*Link Corporation
Economists Incorporated
August 22, 2014**

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I. INTRODUCTION, ASSIGNMENT, AND SUMMARY OF CONCLUSIONS

1. Global Tel*Link Corporation (“GTL”) has asked Economists Incorporated (“EI”) to provide an analysis of GTL’s costs of providing inmate calling services (“ICS”) in compliance with the Federal Communications Commission’s *Rates for Interstate Inmate Calling Services, Report and Order and Further Notice of Proposed Rulemaking* (“ICS Order”).¹ This report comprises the Description & Justification (“D&J”) component of the ICS cost data reporting requirements as requested by the Commission in its *Instructions for Inmate Calling Services Mandatory Data Collection*.²

2. Our cost analysis shows that GTL’s overall cost per minute of providing ICS was \$0.1341 in 2013. Table 1 provides a high-level summary of our calculations.

TABLE 1: 2013 COST SUMMARY

Arrangement Type	Costs (net of commissions)	Revenue-Producing MOUs	Cost per Revenue-Producing MOU
Debit	[REDACTED]	[REDACTED]	[REDACTED]
Prepaid	[REDACTED]	[REDACTED]	[REDACTED]
Collect	[REDACTED]	[REDACTED]	[REDACTED]
Other	[REDACTED]	[REDACTED]	[REDACTED]
Total	[REDACTED]	[REDACTED]	\$0.1341

1. See *Rates for Interstate Inmate Calling Services*, WC Docket No. 12-375, Report and Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd 14107 (Sep. 26, 2013) [hereinafter *ICS Order*].

2. See *Rates for Interstate Inmate Calling Services*, WC Docket No. 12-375, Instructions for Inmate Calling Services Mandatory Data Collection, (Jun. 16, 2014), [hereinafter *ICS Mandatory Data Collection Instructions*], at 1 (“All data that requires clarification should be noted and fully explained in an attached Description and Justification (D&J), submitted in .pdf format. The D&J should also include formulas, explanations, and appropriate references for calculations, where necessary.”).

II. QUALIFICATIONS

3. EI is a premier economic research and consulting firm that specializes in the analysis of antitrust, regulatory and damages issues. EI's Washington, D. C. office is located at 2121 K Street, NW, Suite 1100, Washington, D.C. 20036. EI has been asked to assist GTL in preparing the inmate calling data submission that the Commission has required in this matter. The analysis described in this D&J was performed by Stephen E. Siwek and Christopher C. Holt.

4. Stephen E. Siwek is a Principal at EI. He specializes in the assessment and/or measurement of lost profit damages, the economic performance of U.S. industries that depend on copyright protection and in the economic and financial analysis of regulated industries such as the telecommunications industry. He has been continuously involved in consulting since 1975, and has been employed at Economists Incorporated since 1983. Prior to 1983, he was employed by the Washington D.C. based consulting firm of Snavelly, King and Associates. While employed at these firms, he testified as an expert witness on more than 80 occasions before regulatory bodies and courts.

5. With respect to the telecommunications industry, Mr. Siwek has testified before state public service commissions on issues relating to costing and pricing of network elements for local telecommunications services. He has also testified in arbitration and rate hearings relating to carrier interconnection, access charge levels, telephone directory listings and rate design. He is experienced in the analysis and application of divergent costing methodologies including Total Element Long-Run Incremental Costs ("TELRIC"). Using a TELRIC model, he developed and presented state specific local service cost estimates in more than 10 state commission proceedings.

6. He is co-author of two books and numerous studies of the U.S. copyright industries and their impact on the U.S. economy. He holds a Bachelor of Arts degree in Economics (Boston College) and a Master of Business Administration degree (George Washington University). A full listing of his publications and case experience is provided in his curriculum vitae (See Attachment 1).

7. Christopher C. Holt is an Economist at EI. His areas of expertise in economic consulting are primarily antitrust, class certification, damages, and regulation. His experience in the telecommunications industry includes performing an analysis of local telephone rate regulation and competitiveness in New Jersey and managing an economic study of the effects of rate deregulation nationwide. He also managed a study evaluating the effectiveness of federal broadband subsidies, and assisted with an analysis of mobile wireless market performance in Canada. He recently co-authored an academic article on the effects of vertical integration in the market for regional sports television programming. He holds a Bachelor of Science degree in Telecommunications (Ohio University) and a Master of Arts in Applied Economics (University of Cincinnati). A full listing of his experience is provided in his curriculum vitae (See Attachment 2).

III. DATA AND METHODOLOGY

8. This section describes the sources of data compiled by GTL and explains how these sources were used to satisfy the Commission's reporting requirements. This section also provides justification for specific assumptions and calculations as necessary.

A. Data Sources

1. Contract-Level Cost Data (“Contract Data”)

9. GTL provided revenue and cost data aggregated at the contract level. Each contract is generally associated with multiple facilities and can be categorized as either a jail contract or a prison contract.

10. Based on its internal records, GTL provided data on costs and revenues associated with each contract. Furthermore, GTL provided call-specific metrics such as the number of calls, minutes of use (“MOUs”), and revenues, each of which are disaggregated into the four arrangement-type categories (Debit, Prepaid, Collect, Other ICS) as well as by call-type (local, state intra-LATA, state inter-LATA, interstate, international).

11. An important caveat of these data is that they only include expenses that can be attributed to a given facility or contract. For example, the contract data do not include GTL’s annual capital costs and selling, general, and administrative (“SG&A”) expenses because such costs are not associated with any specific facility. For this reason and as discussed in further detail below in Section III.B.4, the contract data are used for informing the allocation process, but are not used for calculating overall expenses.

2. Income Statements

12. EI reviewed GTL’s consolidated monthly income statements containing GTL’s detailed itemization of costs. These data, while not disaggregated at the contract level, provide a line-by-line overview of GTL’s costs. Because they are comprehensive, we use the income statements to calculate overall costs. Totals shown in the final submissions to the Commission therefore reflect the same totals found in GTL’s income statements.

B. Methodology, Assumptions, and Justifications

13. This section describes, in sequential order as performed, our method for calculating cost totals.

1. ICS vs. Non-ICS Costs

14. In collaboration with GTL, we categorized each cost item listed in the income statement as either an ICS cost or a non-ICS cost.³ The Commission requests cost reporting only for those costs that are “reasonably and directly related to the provision of ICS.”⁴ Such costs include “the cost of capital (reasonable return on investment); expenses for originating, switching transporting, and terminating ICS calls; and costs associated with security features relating to the provision of ICS.”⁵ Non-ICS costs are those “not related to the provision of ICS”.⁶

15. A number of items in the income statements were comprised of aggregate costs that included a portion of non-ICS costs. We scaled these items based on an estimate of the percentage of the costs associated with ICS. This percentage estimate is equal to the total revenue received by GTL from ICS divided by total revenue GTL received.

2. Cost Categories

16. The Commission has required that costs be identified and aggregated by one of four types of costs: telecom, equipment, security, and other.⁷ Through discussions with GTL

3. A small number of items included both ICS and non-ICS costs. These costs were scaled by the amount of GTL’s revenue that is accounted for by ICS.

4. *ICS Order* ¶ 53.

5. *ICS Order* ¶ 53.

6. *ICS Order* ¶ 53.

7. *ICS Mandatory Data Collection Instructions* at 1 (“We specifically require providers to separate costs into the following categories for each service type: (1) telecommunications costs and interconnection fees; (2) equipment investment costs; (3) security costs for monitoring and call blocking; (4) costs of providing inmate

and with reference to the Commission’s guidelines, we reviewed and categorized each cost item in the income statement consistent with the Commission’s definitions for these types of cost.

3. Arrangement Type Category Allocations

17. The Commission has also required that costs be aggregated across four arrangement types. An arrangement type refers to the payment method associated with ICS calling: debit, prepaid, collect, and other. Where possible, we identified costs that could be assigned directly to one cost category and one arrangement type (“direct costs”). However, we found that the overwhelming majority of cost items were common to all arrangement types (“common costs”).⁸ To allocate common costs we calculated the proportion of minutes of use (“MOUs”) associated with each arrangement type, and applied the resulting weights to each common cost within its corresponding cost category. For example, approximately ■ percent of 2012 ICS calling MOUs were associated with debit calls. If a line item on the income statement cost \$100 and represents a common cost, then ■ dollars of this cost would be allocated as a debit cost.

18. After reviewing GTL’s cost data we concluded that MOUs provide a means for cost allocation that is most representative of the proportion of costs borne by each arrangement type, relative to other metrics such as revenue or number of calls placed. Debit calls, for example, are sometimes offered at a discount relative to prepaid calls due to some facility-level mandates; the attendant difference in revenue collection for debit calls is not related to any difference in costs and therefore does not serve to inform a cost allocation. Moreover, costs

calling services that are ancillary to the provision of ICS, including any costs that are passed through to consumers as ancillary charges; and (5) other relevant cost data.”).

8. Indeed, we concluded that the only direct cost incurred by GTL specific to arrangement type is bad debt, which is associated only with collect calls.

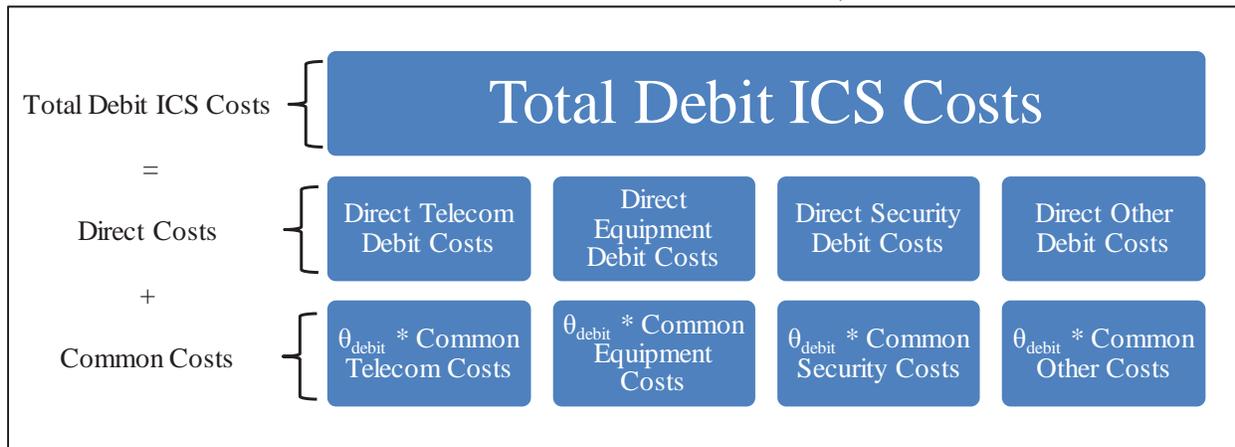
such as service, maintenance, and repair (“SMR”), or those related to “wear and tear,” are increasing in direct proportion with the amount of time spent on a call; in this regard MOUs provide a more precise representation of cost allocation than does the number of calls placed. Aside from the bad debt associated with collect calls, we found no significant differences in the cost of provision across arrangement types. Because bad debt is a direct cost assigned entirely to collect calls, it is therefore sensible to use minutes of use as an allocation device for the remaining common costs.

19. Cost totals for each arrangement type can be expressed algebraically as follows:

$$(1) \quad ICS\ Costs_i = \sum_{j=1}^J Direct_{i,j} + \theta_i * Common_j$$

where subscript i represents the arrangement type (debit, prepaid, collect other), and subscript j represents the cost type (telecom, equipment, security, other). Common cost allocation weights are expressed by θ_i , equal to the percentage of MOUs associated with each arrangement type. Figure 1 below illustrates the reporting hierarchy for debit costs; the prepaid, collect, and “other” arrangement types share identical cost structures.

FIGURE 1: FCC COST REPORTING HIERARCHY, DEBIT ICS COSTS



4. Contract Size Category Allocations

20. As noted above, a large portion of GTL’s costs, such as annual capital costs and selling, general, and administrative (“SG&A”) expenses, are not contract-specific. Therefore, an allocation device is again necessary for estimating how non-contract specific costs are distributed across the Commission’s designated contract and facility size categories. We referred to GTL’s contract-level data to allocate costs under the Commission’s contract size categories, which are based on the average daily population (“ADP”) associated with each contract.⁹ We apply a similar allocation process here as that applied to the ICS arrangement type allocations. Specifically, we first calculate the relative proportions of costs associated with each contract/facility size category, using those costs that can be definitively assigned to a given contract. We then apply these weights to the total costs as calculated using the income statement. The subset of cost data that is contract-specific is more representative of total costs than other metrics such as minutes of use or revenues and therefore preferred for this allocation.

21. Within each size category, the Commission also requires MOUs and number of calls to be counted and reported by jurisdiction type: local, state intra-LATA, state inter-LATA, interstate, and international.¹⁰ While GTL tracks its calls and MOUs at both the contract and jurisdiction level, it does not track site commissions in this manner. As noted below, site commissions are allocated based on revenue.

9. Size categories, by ADP, are as follows: Jails 0-99; Jails 100-349; Jails 350-999; Jails 1000 & Over; Prisons 1-4,999; Prisons 5,000- 19,999; Prisons 20,000 & Over.

10. *ICS Mandatory Data Collection Instructions* at 1, 4, 5 6.

5. Ancillary Fees

22. A number of items in the income statements were comprised of aggregate costs that included a portion of ancillary costs. We apportioned these items based on an estimate of the percentage of the costs that were ancillary. This percentage estimate is equal to the total revenue received by GTL from ancillary fees, divided by total revenue GTL received. We applied this percentage estimate to each cost item containing a portion of ancillary costs to achieve an estimate of total ancillary costs for each year.

23. GTL provided aggregate demand totals for each itemized cost. Units of demand vary across ancillary cost items in the provided list. For example, state USF administrative fees for LEC billed calls are charged on a monthly basis, while state regulatory cost recovery fees for LEC billed calls are charged on a per-call basis. GTL does not track cost totals associated with each ancillary fee item therefore no such breakdown is presented.

6. Other Justifications

24. We calculated GTL's annual capital costs by determining the market value of GTL's assets in each year and applying a rate of return of 11.25 percent.¹¹

25. Site commission totals by arrangement type and jurisdiction were allocated based on revenue because GTL's contracts generally dictate site commission payments to the facility as a percentage of revenue; using MOUs for this allocation would be less precise.

11. The Commission has accepted this rate of return in previous cost studies used to inform interim rate caps in this proceeding, *ICS Order* at note 203. The market value of GTL's assets was determined on the basis of discussions with GTL executives regarding the sale and/or purchase of GTL and another ICS provider since 2011.

IV. CONCLUSIONS

26. As discussed above, GTL's historical costs of providing ICS are presented for the years 2012 through 2014 in the attached. In some instances GTL has redacted cost information that is confidential or competitively sensitive.

Attachment 1

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Education

B.A. (Economics) Boston College, 1973

M.B.A. George Washington University, 1975

Present Position

Principal, Economists Incorporated

Previous Employment

Senior Consultant, Snively, King & Associates Inc. (1975-1983)

Consulting Specialties

Development and provision of expert witness testimony in connection with economic, financial and accounting issues for regulated industries including communications, energy and postal concerns.

Economic and financial consulting and expert witness testimony in antitrust, contract and bankruptcy litigation. Particular emphasis on the estimation of lost profit damages.

Economic analysis of international trade issues relating to media and copyright industries.

Books

International Trade in Computer Software, Stephen E. Siwek and Harold W. Furchtgott-Roth, Quorum Books, Westport, Connecticut, London, 1993, ISBN: 0-89930-711-6.

Books (continued)

International Trade in Films and Television Programs, Steven S. Wildman and Stephen E. Siwek, American Enterprise Institute/Ballinger Publishing Company, Cambridge, Massachusetts, 1988, ISBN: 0-88730-240-8.

The Audiovisual Services Sector in the GATS Negotiations, Patrick A. Messerlin, Stephen E. Siwek, and Emmanuel Cocq, AEI Press, 2004. Chapter only.

Papers and Articles

“Telecommunications and Entertainment: Trade in Films and Television Programming,” (with Steven S. Wildman) presented at *Trade in Services and the Uruguay Round Negotiations*, the Civils, London, England, July 8, 1987 and Centre D’Etudes Pratiques De La Negociation Internationale, Geneva, Switzerland, July 10, 1987.

“The Privatization of European Television: Effects on International Markets for Programs” (with Steven S. Wildman), *Columbia Journal of World Business*, Vol. XXII, No. 3, Fall 1987.

“Europe 1992 and Beyond: Prospects for U.S. Film and Television Employment,” presented at *EC 1992: Implications for U.S. Workers*, U.S. Department of Labor, Bureau of International Labor Affairs and The Center for Strategic and International Studies, Washington, D.C., March 19, 1990.

“The Dimensions of the Export of American Mass Culture” presented at *The New Global Popular Culture*, American Enterprise Institute for Public Policy Research, March 10, 1992. Broadcast on “C-Span,” reported in AP Wire Service, *Business Week*, *The American Enterprise*, follow-up radio interview etc.

“Competing with Pirates: Economic Implications for the Entertainment Strategist,” (with Harold W. Furchtgott-Roth) *The Ernst & Young Entertainment Business Journal*, Volume 3, 1992, P. 18.

“The Economics of Trade in Recorded Media Products in Multilingual World: Implications for National Media Policies,” (with Steven S. Wildman) in *The International Market in Film and Television Programs*, Ablex Publishing Corporation, Norwood, New Jersey, 1993, ISBN: 0-89391-545-9.

“Changing Course: Meaningful Trade Liberalization for Entertainment Products in GATS,” presented at *World Services Congress 1999*, November 1, 1999.

Papers and Articles (continued)

“Copyright Industries in the U.S. Economy: The 2002 Report,” (Reviewed and summarized in the Hungarian Journal Iparjogvedelmi Es Szerzoi Jogi Szemle) Released April 2002.

“The Measurement of “Copyright” Industries: The US Experience,” in *Review of Economic Research on Copyright Issues*, Volume 1, Number 1, June 2004, published by the Society for Economic Research on Copyright Issues.

“Changing Course: Meaningful Trade Liberalization For Entertainment Products in the GATS,” *The Audiovisual Services Sector in the GATS Negotiations*, AEI Press, 2004.

Selected Studies

Siwek and Furchtgott-Roth, *Copyright Industries in the U.S. Economy*: (released in November 1990).

Siwek and Furchtgott-Roth, *Copyright Industries in the U.S. Economy: 1977 – 1990* (released in September 1992).

Siwek and Furchtgott-Roth, *Copyright Industries in the U.S. Economy: 1993 Perspective* (released in October 1993).

Siwek and Furchtgott-Roth, *Copyright Industries in the U.S. Economy: 1977 – 1993* (released in January 1995).

Siwek and Mosteller, *Copyright Industries in the U.S. Economy: The 1996 Report* (released in October 1996).

Siwek and Mosteller, *Copyright Industries in the U.S. Economy: The 1998 Report* (released in May 1998).

Siwek, *Copyright Industries in the U.S. Economy: The 1999 Report* (released in December 1999).

Siwek, *Copyright Industries in the U.S. Economy: The 2000 Report* (released in December 2000).

Siwek, *Copyright Industries in the U.S. Economy: The 2004 Report* (released in December 2004).

Selected Studies (continued)

The U.S. Software Industry: Economic Contribution in the U.S. and World Markets, by Stephen E. Siwek and Harold W. Furchtgott-Roth, for the Business Software Alliance, March 1993.

Engines of Growth: Economic Contributions of the U.S. Intellectual Property Industries, by Stephen E. Siwek for NBC Universal, November 2005.

The True Cost of Motion Picture Piracy to the U.S. Economy, Policy Report 186, by Stephen E. Siwek for Institute for Policy Innovation, September 2006.

The True Cost of Sound Recording Piracy to the U.S. Economy, Policy Report 188, by Stephen E. Siwek for Institute for Policy Innovation, August 2007.

True Cost of Recorded Music Piracy to the U.S. Economy, by Stephen E. Siwek for Institute for Policy Innovation, August 2007.

The True Cost of Copyright Industry Piracy to the U.S. Economy, Policy Report 189, by Stephen E. Siwek for Institute for Policy Innovation, October 2007.

Siwek, *Copyright Industries in the U.S. Economy: The 2006 Report* (released in January 2007).

Video Games in the 21st Century, Economic Contributions of the US Entertainment Software Industry, by Stephen E. Siwek for Entertainment Software Association, November 2007.

Video Games in the 21st Century: The 2009 Report, by Stephen S. Siwek for Entertainment Software Association, 2009.

Copyright Industries in the U.S. Economy: The 2003-2007 Report, Prepared for the International Intellectual Property Alliance (IIPA), 2009.

Video Games in the 21st Century: The 2010 Report, by Stephen S. Siwek for Entertainment Software Association, 2010.

Continuing Legal Education Programs

Panelist, *Monopolization Issues Affecting Computer Software*, D.C. Bar, Antitrust, Trade Regulation and Consumer Affairs Section, June 21, 1994.

Continuing Legal Education Programs (continued)

Panelist, *Basic Antitrust Law*, D.C. Bar/George Washington University National Law Center.

Billing and Collection for 900-Number Calls: A Competitive Analysis, by Stephen E. Siwek and Gale Mosteller for the Billing Reform Task Force, September 1999.

Other

Moderator, *Economic Loss Panel*, International AntiCounterfeiting Coalition, Fall Meetings, Washington, D.C. November 14, 1994.

Panelist, *The Economics of Counterfeiting: A Supply and Demand Look into this Multi Billion Dollar Problem*, International Anti-Counterfeiting Coalition, Annual Conference, May 21, 1999.

Advisor to the Special Master, *Aggregate Products, Inc. v. Granite Construction Company*, U.S. District Court for Southern District of California, Civil No. 98-0900 E (AJB).

Invited Expert, WIPO Working Group of Experts on the Preparation of a WIPO Handbook on Survey Guidelines for Assessing the Economic Impact of Copyright and Related Rights, Helsinki, Finland, July 2-5, 2002.

Advisor to Hungarian Patent Office. Re: Study of the Economic Contribution of Copyright-Based Industries in Hungary. Released October, 2005.

Advisor to Russian Federation, Federal Service for Intellectual Property, Patents, and Trademarks. Re: Study of the Economic Contribution of Copyright-Based Industries in Russia April 2005.

COURT TESTIMONY AND APPEARANCES

Jurisdiction	Case	Subject
U.S. District Court for Eastern District of Virginia, Alexandria Division	Eden Hannon & Co. v. Sumitomo Trust & Banking Co. (USA) Civil Action No. 89-0312A	Analysis of Financial Models, Cash Flow Analysis
Circuit Court for Pinella County, Florida	Home Shopping Network Inc. v. GTE, GTE FLA., Inc. and GTE Communications Corp. CT. Civ. 87-014199-7	Relevance of Planning & Budgeting Reports to the Analysis of Damages
U.S. District Court for Western District of Oklahoma	Banner Industries, Inc. v. PepsiCo, Inc. CIV-85-449-R	Financial Plans Financial Viability (Deposition Testimony Only)
Circuit Court for Baltimore City	Pulse One Communications Inc. v. Bell Atlantic Mobile Systems Inc. Case No. 90108057/CC112199	Damages (Deposition Testimony Only)
Supreme Court of the State of New York County of New York	Scandinavian Gourmet Provisions, d/b/a Fredricksen & Johannesen v. Jurgela, aka Al Jurgela, aka Constantine Jurgela, aka C.R. Jurgela, Valco Equities Ltd. Charles Earle, Valco Development Corp., Chase Manhattan Bank, Clinton Barrow, Franklin Investors and Harold L. Goerlich Index No. 22891/90	Damages
Chancery Court of Davidson County, Tennessee	MCI Telecommunications Corp. v. Dudley W. Taylor etc. et al. No. 88-1227-III	Tax Treatment of Telephone Access Charges

COURT TESTIMONY AND APPEARANCES (continued)

Jurisdiction	Case	Subject
Superior Court of the District of Columbia Civil Division	Robert H. Kressin, General Partner, Cellular Phone Stores Limited Partnership v. Bell Atlantic Mobile Systems, Inc. Civil Action No. 02258-91	Damages, Cellular Telephone Industry
Court of Common Pleas First Judicial District of Pennsylvania	Shared Communications Service of 1800-80 JFK Boulevard Inc. v. Bell Atlantic Properties, Inc. et al. September Term 1900, No. 775	Damages, Telecommunications Industry
United States District Court for the Northern District of Illinois	JamSports and Entertainment, LLC, Plaintiff v. ParadamaProductions, Inc., et al. Case No. 02C 2298	Damages
Superior Court of New Jersey, Law Division, Essex County	Bell Atlantic Network Services, Inc. v. P.M. Video Corp., Docket No. L-6602- 91	Damages (Deposition Testimony Only)
U.S. District Court for the District of Columbia	FreBon International Corp. v. Bell Atlantic Corp. et al. Civil Action No. 94-324	Damages (Deposition Testimony Only)
U.S. District Court for the Eastern District of New York	Universal Contact Communications Inc. v. PageMart Inc.	Damages (Deposition Testimony Only)
U.S. District Court for District of Maryland	Integrated Consulting Services, Inc. v. LDDS	Damages (Deposition Testimony Only)

COURT TESTIMONY AND APPEARANCES (continued)

Jurisdiction	Case	Subject
U.S. District Court Eastern District of Virginia, Alexandria Division	Mexinox, S.A. et al. v. Acerinox	Antitrust Damages (Deposition Testimony Only)
U.S. District Court Eastern District of North Carolina	Broad Band Technologies, Inc. v. General Instrument Corp.	Patent Damages (Deposition Testimony Only)
International Chamber of Commerce International Court of Arbitration	WorldSpan L.P. v. Abacus Distribution Systems Pte Ltd. And Other Case No. 9833/FMS	Damages and License Valuation
U.S. District Court for Western District of Washington at Seattle Case No. C97-10732	Arbitration between Electric Lightwave, Inc., Plaintiff v. USWest Inc., Defendant	Damages
U.S. District Court for District of Maryland Civil Case No. PJM 03-307	Final Analysis Communication Services, Inc. v. General Dynamics Corp., et al.	Damages (Rebuttal Only)
U.S. District Court for the Western District of Oklahoma	Eateries, Inc. and Fiesta Restaurant, Inc. v. J.R. Simplot Company No. CIV-99-1330-C	Damages (Deposition Testimony Only)
American Arbitration Association	Arbitration Between Avecia Inc., Claimant v. Mareva Poscines Et Filtrations, S.A. Respondent	Allocation of FIFRA Data Costs

COURT TESTIMONY AND APPEARANCES (continued)

Jurisdiction	Case	Subject
American Arbitration Association	Arbitration Massillon Cable TV, Inc., Claimant v. Fox Sports Net Ohio LLC	Licensing Fees For Regional Sports Programming
Commonwealth of Massachusetts, Middlesex Superior Court	Netrix, Inc and Proteon, Inc. v. Digital Equipment Corp. and Cabletron Systems, Inc. CIV No. MICX 98-01533	Valuation of Software License
Circuit Court for the City of Richmond, VA	Interactive Return Service, Inc. v. Virginia Polytechnic Institute and State University Case No. LM 870-3	Damages (Deposition and Testimony before Judge Only)
State of Connecticut Superior Court Complex Litigation Docket	Alan M. Glazer et al. v. The Dress Barn, Inc. Case No. (X02) CV-01-0169075 S	Damages
Circuit Court of the County of St. Louis, State of Missouri	Biomedical Systems Corp. v. Mead Johnson & Company Case No. 01CC-003428	Damages (Deposition Testimony only)
Private Arbitration	Dennis M. Donovan v. Raytheon Company	Valuation of Pension Benefits
World Trade Center, Victims Compensation Fund	Raymond Murphy	(Oral Testimony and Report)
World Trade Center Victims Compensation Fund	Dennis McHugh	(Oral Testimony and Report)
World Trade Center Victims Compensation Fund	Robert Crawford	(Oral Testimony and Report)

COURT TESTIMONY AND APPEARANCES (continued)

Jurisdiction	Case Subject	
World Trade Center Victims Compensation Fund	James Corrigan	(Report)
World Trade Center Victims Compensation Fund	John Moran	(Report)
World Trade Center Victims Compensation Fund	Nathaniel Webb	(Report)
U.S. District Court for the Northern District of Illinois, Eastern Division, No. 01-C 0067	ChoiceParts, LLC v. General Motors Corporation et al.	Damages (Deposition and Report)
Commonwealth of Massachusetts, Middlesex, ss. Superior Court, Civil Action No. 01-2590	DataSafe, Inc. and David F. Muller v. Federal Express Corporation et al.	Damages (Deposition and Report)
United States District Court, Southern District Of Texas	Enron Creditors Recovery Corp. v. St. Paul Fire & Marine Insurance Company, Federal Insurance Company, The Great American Insurance Company Case No. 4:06-CV-03905	Fidelity Insurance Claim (Deposition and Report)
United States Bankruptcy Court, Southern District Of New York	CCT Communication, Inc. v. Global Crossing Telecommunication, Inc.	Damages (Deposition and Report)
American Arbitration	Armstrong Utilities, Inc. v. DirectTV Sports Net Pittsburgh	Licensing Fee for Regional Sports Programming

REGULATORY COMMISSION TESTIMONY AND APPEARANCES

Commission	Docket No.	Subject
Connecticut	96-02-22	Cost of Local Service
Wyoming	70000-TR-96-323	US WEST Phase II Price Regulation Plan
Pennsylvania	1-00960066	Financial Analysis
Pennsylvania	A-310203 F0002 et al.	Cost of Local Service
West Virginia	96-1516-T-PC et al.	Cost of Local Service
Minnesota	P-442, 5321 et al.	Generic Investigation of US WEST's Communications Cost
Iowa	RPU-96-9	Generic Investigation of US WEST's Communications Costs
Illinois	80-0511	Rate Base, Expenses, Forecasting
Maryland	7222	Power Plant Certificate Issues
District of Columbia*	777	Telephone Advertising and Parent Company Transactions
Illinois	82-0082	Gas Rate Design
Pennsylvania	M-810294	Energy Costs and Rate Design
Pennsylvania	R-822169	Nuclear Plant Economics
New Jersey	8011-827	Water and Sewerage Forecast
District of Columbia	798	Telephone Price Elasticity, Centralized Costs, Working Capital
California	83-06-65	Telephone Access Charges
Illinois	83-0142	Telephone Access Charges

* Prefiled but not sworn. Case Settled April, 1982.

REGULATORY COMMISSION TESTIMONY AND APPEARANCES (continued)

Commission	Docket No.	Subject
U.S. International Trade Commission	731-TA-457	Hand tools from People's Republic of China
U.S. Postal Rate Commission	R 83-1	Financial Viability for Electronic Mail Service
U.S. Postal Rate Commission	R 84-1	Class Revenue Requirement, Demand Projections
U.S. Postal Rate Commission	R 87-1	Pricing of Third Class Mail
U.S. Postal Rate Commission	R 90-1	Pricing of Third Class Mail
U.S. Postal Rate Commission	R2000-1	Pricing and Costing of Bound Printed Matter
Maryland	6807, Phase I	Utility Forecasting
New Jersey	762-194	Utility Forecasting
District of Columbia	685	Utility Forecasting
District of Columbia	827	Econometric Demand Modeling for Coin Telephone Service
Maryland	7149	Utility Forecasting & Promotional Activities
Maryland	7300	Utility Forecasting
Maryland	7348	Utility Forecasting
Maryland	7427	Utility Forecasting
District of Columbia	737	Utility Forecasting
Maryland	7305	Telephone Advertising
Maryland	7163	Service Terminations

REGULATORY COMMISSION TESTIMONY AND APPEARANCES (continued)

Commission	Docket No.	Subject
Maryland	7070	Utility Promotional Activities
District of Columbia	729	Telephone Advertising & Parent Company Transactions
Maryland	6807, Phase II	Utility Emergency Procedures
Maryland	7467	Telephone Advertising, Parent Company Transactions
Maryland	7466	Gas Utility Advertising
New Hampshire	79-18	Industrial Conservation
Maryland	7236	Utility Promotional Activities
District of Columbia	834	Electric Utility Load Management Evaluation
California	85-01-034	Telephone Rate Design, Cost of Service
Massachusetts	86-213	Paging Company; Financial Viability, Pricing Analysis
District of Columbia	869	Fuel Price and Electric Demand Forecasts
Louisiana	U-17949 B	Customer Owned Coin Operated Telephones
New Jersey	TO92030358	Yellow Pages/Directory Services
Delaware	41	Development of Rules for the Implementation of Price Cap Regulation
Utah	94-999-01	Cost of Local Service
Connecticut	97-04-01	Cost of Local Service
New Mexico	97-35-TC	Cost of Local Service

REGULATORY COMMISSION TESTIMONY AND APPEARANCES (continued)

Commission	Docket No.	Subject
Maine	97-505	Cost of Local Service
Vermont	5713	Cost of Local Service
New York	94-C-0095	Access Charges/Financial Analysis
New Jersey	TX95120631	Access Charges/Financial Analysis
New Hampshire	DE97-171	Cost of Local Service
Colorado	97F-175T	Access Charges/Financial Analysis
Utah	97-049-08	Access Charges/Financial Analysis
Connecticut	98-04-03	Joint and Common Costs
Rhode Island	2681	Cost of Local Service
Arkansas	99-015-U	Arbitration of Interconnection Rates
Connecticut	00-01-02	Non-recurring and Recurring Costs
New Mexico	316	Inmate Phone Rates

WRITTEN TESTIMONY ONLY

Jurisdiction	Case	Subject
U.S. District Court of Southern District of New York	In Re "Apollo" Air Passenger Computer Reservation System (CRS) MDL DKT. No. 760-M-21-49-MP	Liquidated Damages, Actual Damages
Supreme Court of the Republic of Palau	Orion Telecommunications, Ltd. v. Palau National Communications Corporations, Civil Action No. 835-88	Lost Profit Damages

WRITTEN TESTIMONY ONLY (continued)

Jurisdiction	Case	Subject
U.S. District Court for the District of Columbia	A&S Council Oil Company, Inc. et al. v. Patricia Saiki, et al. Civil, Action No. 87-1969-OG	Damages
U.S. District Court for Eastern District of Texas	R & D Business Systems, et al. v. Xerox Corp. Civil Action No. 2: 92-CV-042	Valuation of Non-Monetary Provisions of Stipulation of Settlement
U.S. District Court Eastern District of Michigan, Southern Division	Little Caesar Enterprises, Inc. v. Gary G. Smith, et al. Civil No. 93-CV-73354-DT	Class Certification (Joint Declaration with Philip Nelson)
FCC	Various	Cellular Radio Pricing: Critique of Competing Applications for Cellular in Seattle, Miami, Denver and Detroit
FCC Pricing	83-1145	Directory Data Base and Access
U.S. District Court for the District of Columbia	American Association of Cruise Passengers v. Host Marriott Corp. et al.	Damages
U.S. District Court for Eastern District of Texas	Jason R. Searcy et al. v. Philips Electronics North America Corp. et al. Consolidated Civil Action No. 1:95-CV 363, 364	Damages
U.S. District Court for Eastern District of Texas Beaumont Division	USA ex. rel. Lloyd Bortner v. Phillips Electronics	Penalties under False Claims Act

WRITTEN TESTIMONY ONLY (continued)

Jurisdiction	Case	Subject
FCC	In Re: Applications of Motorola, Inc.; Motorola SMR, Inc.; and Motorola Communications and Electronics, Inc. and FCI 900, Inc. For Consent to Assignment of 900 MHz Specialized Mobile Radio Licenses DA 00-2352	Wireless Dispatch Services (with Michael Baumann)
FCC (Market Disputes Resolution)	McLeodUSA Publishing Company v. Wood County Telephone Company, Inc.	Subscriber Listing Information
FCC (Market Disputes Resolution)	Yellow Book USA, Inc. v. Broadwing Inc. and Cincinnati Bell Telephone Company	Subscriber Listing Information (Written Report and Deposition Testimony)
United States of America v. United Kingdom of Great Britain and Northern Ireland	U.S. – U.K. Arbitration Concerning Heathrow Airport User Changes	Participating in Negotiations Leading to Settlement of Arbitration and Related Litigation
FCC	In the Matter of Review of the Section 251 Unbundling Obligations of Incumbent Exchange Carriers CC Docket No 01-338	Broadband Telecommunications Services
FCC	Core Communications, Inc. v. Verizon Maryland Inc. File No. EB-01- MD-007. Report.	Damages

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PROFESSIONAL EXPERIENCE

ECONOMISTS INCORPORATED, Washington, DC, 2014-present

Economist

NAVIGANT CONSULTING INCORPORATED, Washington, DC, 2011-2013

Managing Consultant

APPLIED ECONOMICS RESEARCH INSTITUTE, Cincinnati, OH, 2009-2010

Research Assistant

CARBON MARKET SOLUTIONS, Hamilton, New Zealand, 2008

Analyst

EDUCATION

M.A., Applied Economics, UNIVERSITY OF CINCINNATI, Cincinnati, OH, 2010

B.S., Telecommunications, OHIO UNIVERSITY, Athens, OH, 2007

JOURNAL ARTICLES

Vertical Integration in Multichannel Television Markets: A Study of Regional Sports Networks,
12(1) REVIEW OF NETWORK ECONOMICS (March 2013), co-authored with Kevin Caves and Hal
Singer.

SELECTED CONSULTING EXPERIENCE

Energy:

- Estimated damages associated with emissions credits for major coal producer in breach of contract litigation
- Performed competitive analysis of the oil pipeline origin market in the Northeast United States

Pharmaceuticals:

- Estimated damages on behalf of plaintiff in major pharmaceutical antitrust litigation
- Assessed anticompetitive harm to plaintiff pre- and post- *FTC v. Actavis* standard in “pay-for-delay” litigation matter
- Assessed economic issues associated with patent validity, at-risk entry, Hatch-Waxman regulation

Telecommunications:

- Designed econometric analysis for estimating fair market value of regional sports network distribution agreements for FCC arbitration
- Performed valuation of telecast rights on behalf of regional sports network
- Performed liability and damages analysis for “tying product” litigation matter in the market for cable set top boxes
- Advised Canadian Competition Bureau on the impact of a vertical merger in the cable television industry
- Designed spectrum repackaging analysis for client engaged in upcoming 600 MHz FCC spectrum incentive auction

ARTICLES AND WHITE PAPERS – SUPPORTING ROLE

Jeff Eisenach, *Competition in the New Jersey Communications Market: Implications for Reform*, WORKING PAPER (March 2011).

Jeff Eisenach & Kevin Caves, *Evaluating the Cost-Effectiveness of RUS Broadband Subsidies: Three Case Studies*, WORKING PAPER (April 2011).

Jeff Eisenach & Kevin Caves, *What Happens When Local Phone Service is Deregulated?*, REGULATION MAGAZINE (Fall 2012).

Jeff Eisenach, *The Equities and Economics of Property Interests in TV Spectrum Licenses*, WORKING PAPER (January 2014).

Erik Bohlin, Kevin Caves & Jeff Eisenach, *Mobile Wireless Market Performance in Canada: Lessons from the EU and the US*, NAVIGANT ECONOMICS (September 2013).

Jeff Eisenach & Kevin Caves, *Economic and Legal Aspects of FLSA Exemptions: A Case Study of Companion Care*, LABOR LAW JOURNAL 63:2 (Fall 2012) 174-202.

Jeff Eisenach & Hal Singer, *Avoiding Rent-Seeking in Secondary Market Spectrum Transactions*, 65 FEDERAL COMMUNICATIONS LAW JOURNAL (2013).

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*ADMITTED IN DC ONLY

September 29, 2014

Via ECFS

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

Re: **REDACTED VERSION - WC Docket No. 12-375, Global Tel*Link Corporation Supplemental Response to One-Time Mandatory Data Collection**

Dear Secretary Dortch:

Global Tel*Link Corporation (“GTL”),¹ hereby supplements its Data Collection submission filed on August 22, 2014, the above-referenced proceeding² in response to a request from staff of the Federal Communications Commission (“FCC”). As explained in GTL’s Description and Justification (D&J) also filed August 22, 2014, “GTL does not track cost totals associated with each ancillary fee item therefore no such breakdown is presented.” See D&J submission ¶ 23. GTL instead presented aggregate total cost estimates associated with all ancillary fees for each year. Staff of the FCC has asked if GTL can provide the costs attributed to each ancillary fee category. In order to disaggregate the costs associated with GTL’s

¹ The Instructions for Inmate Calling Services Mandatory Data Collection require data to be filed at the holding company level. Accordingly, this response is being filed by GTL on behalf of itself and its wholly owned subsidiaries that also provide inmate calling services: DSI-ITI, LLC, Public Communications Services, Inc., and Value-Added Communications, Inc.

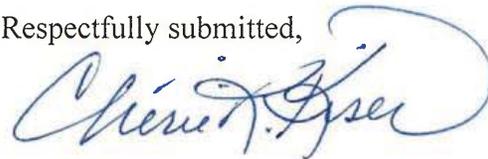
² *Rates for Interstate Inmate Calling Services*, 28 FCC Rcd 14107 (2013) (“ICS Order”), *pets. for review pending sub nom. Securus Technologies, Inc. v. FCC*, No. 13-1280 (D.C. Cir. filed Nov. 14, 2013).

ancillary fees, Economists Inc. used the revenue associated with each GTL ancillary fee category to calculate allocation weights (equal to a given item's proportion of total ancillary fee revenues). These weights were then applied to the aggregate total cost estimates to produce an itemized breakdown of cost estimates associated with each ancillary fee. Based on this methodology, the cost estimates for each ancillary fee category are reflected in the spreadsheet.

As required by the Instructions for Inmate Calling Services Mandatory Data Collection, GTL provides its data and supporting documents in accordance with the requirements of the *Protective Order* adopted in this proceeding.³ Specifically, GTL provides a REDACTED version of its response via ECFS, and a CONFIDENTIAL version of its response in hard copy to the Secretary's Office.⁴

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

Respectfully submitted,



Chérie R. Kiser

Counsel for Global Tel*Link Corporation

Enclosure

cc: Lynne Engledow (via electronic mail)

³ *Rates for Interstate Inmate Calling Services*, 28 FCC Rcd 16954 (2013) (“*Protective Order*”).

⁴ GTL reserves all rights and no waiver of rights should be inferred, nor should the rendering of this response be considered an abandonment of GTL's right to challenge the Commission's jurisdiction over ancillary fees or intrastate inmate calling services.

REDACTED - FOR PUBLIC INSPECTION

HOLDING COMPANY NAME: Global Tel*Link Corporation

RUNING DATE: 8/22/2014 as supplemented on 9/29/2014

ANCILLARY FEES

2014									
TOTAL ANCILLARY FEES									
Fee Description	State	Applies to Prisons (P), Interlocks (I), Inmate (In) or International (Int)	Applies to Local (L), State (St), Inmate (In), Interstate (Int) or International (Int)	Recurring Charge	Non-Recurring Charge	Demand	Direct Cost	Common Costs	n/a
CS Ancillary Charges									
TOTAL									
BY FEE									
Federal USF Admin Fee for LEC billed calls - \$0.05 - \$3.49 per month	AL, AR, AZ, CA, CO, CT, DC, DE, FL, GA, HI, IL, IN, IA, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NM, NV, NY, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY		L, Intra, Inter, Lines, Int	Y		211,346			
Monthly bill statement fee - \$1.50 - \$5.00 per month	AL, AR, AZ, CA, CO, DE, FL, GA, IA, ID, IL, IN, KS, LA, MA, MD, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NM, NV, NY, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY		L, Intra, Inter, Lines, Int	Y		822,929			
State Regulatory Cost Recovery Fee for LEC billed calls - \$0.05 - \$0.80 per month	AL, AR, AZ, CA, CO, DE, FL, GA, IA, ID, IL, IN, KS, LA, MA, MD, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NM, NV, NY, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY		L, Intra, Inter, Lines, Int	Y		355,855			
State USF Admin Fee for LEC billed calls - \$0.05 - \$0.35 per month	AZ, CO, IL, IN, KS, MO, NE, OK, PA, UT		L, Intra, Inter, Lines, Int	Y		195,847			
Per call administrative fee - Tennessee - \$0.15 for calls from county facilities in Tennessee	AL, AR, AZ, CA, CO, DE, FL, GA, ID, IL, IN, IA, MD, MI, MN, MS, NC, NE, NH, NY, OH, OK, OR, PA, RI, SC, TN, TX, VA, WA, WI, WV, WY		L, Intra, Inter, Lines, Int	Y		3,049,958			
Credit Card Processing Fee in denominations of \$2.00 - \$9.00 per transaction or 10% of transaction amount	AL, AR, AZ, CA, CO, DE, FL, GA, IA, ID, IL, IN, KS, LA, MA, MD, MI, MN, MO, MS, MT, NC, NE, NH, NJ, NM, NV, NY, OH, OK, OR, PA, RI, SC, TN, TX, UT, VA, VT, WA, WI, WV, WY		L, Intra, Inter, Lines, Int	Y		11,408,021			
Federal USF Admin Fee for non-LEC billed calls	AL, AR, AZ, CA, CO, DE, FL, GA, IA, ID, IL, IN, KS, LA, MA, MD, MI, MN, MO, MS, MT, NC, NE, NH, NJ, NM, NV, NY, OH, OK, OR, PA, RI, SC, TN, TX, UT, VA, VT, WA, WI, WV, WY		L, Intra, Inter, Lines, Int	Y		3,419,095			
State Regulatory Cost Recovery Fee for non-LEC billed calls	AL, AR, AZ, CA, CO, DE, FL, GA, IA, ID, IL, IN, KS, LA, MA, MD, MI, MN, MO, MS, MT, NC, NE, NH, NJ, NM, NV, NY, OH, OK, OR, PA, RI, SC, TN, TX, UT, VA, VT, WA, WI, WV, WY		L, Intra, Inter, Lines, Int	Y		29,077,284			
Wireless administration fee - 4% to 8% of value of call	AL, AR, AZ, CA, CO, DE, FL, GA, IA, ID, IL, IN, KS, LA, MA, MD, MI, MN, MO, MS, MT, NC, NE, NH, NJ, NM, NV, NY, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY		L, Intra, Inter, Lines, Int	Y		11,851,042			
Account close-out fee	WI, WV, WY		L, Intra, Inter, Lines, Int	Y		215,623			
Credit Card chargeback fee - \$25	WI, WV, WY		L, Intra, Inter, Lines, Int	Y					
Minimum payment fee - \$5	AL, AR, AZ, CA, CO, CT, DE, FL, GA, HI, IL, IN, IA, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NM, NV, NY, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY		L, Intra, Inter, Lines, Int	Y		76,670			

Collins Declaration

Exhibit 3



STATE OF ALABAMA
PUBLIC SERVICE COMMISSION
P.O. BOX 304260
MONTGOMERY, ALABAMA 36130

TWINKLE ANDRESS CAVANAUGH, PRESIDENT

JOHN A. GARNER,

EXECUTIVE DIRECTOR

JEREMY H. ODEN, ASSOCIATE COMMISSIONER

CHRIS "Chip" BEEKER, Jr., ASSOCIATE COMMISSIONER

December 5, 2014

Via EFCS

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

Re: WC Docket No. 12-375

Dear Ms. Dortch:

Pursuant to the Protective Order issued on December 19, 2013 in the above-captioned proceeding, attached are Acknowledgements of Confidentiality for Darrell Baker, John Garner, Doug Dillard, Luke Bentley, Joe Leverette, David Peeler, and Earl McArthur, from the Alabama Public Service Commission ("APSC") staff. Acknowledgements of Confidentiality will be provided to counsel for the Submitting Party with our request for Stamped Confidential Documents and Confidential Information in accordance with paragraph 5 of the Protective Order.

The APSC seeks confidential documents filed with the Commission in this proceeding by: Securus Technologies, Inc.; Global Tel*Link Corporation; Telmate, LLC; CenturyLink Public Communications, Inc.; Inmate Calling Solutions, LLC; Pay Tel Communications, Inc.; and Network Communications International Corporation.

Please contact the undersigned if you have any questions regarding this matter.

Sincerely,

/s/ Darrell A. Baker

Darrell A. Baker
Director, Utility Services Division
100 North Union Street, RSA Union
Montgomery, Alabama 361004
(334) 242-2947
darrell.baker@psc.alabama.gov

Enclosures

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.

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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.

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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 5th day of December, 2014.



Darrell A. Baker

Director, Utility Services Division

Alabama Public Service Commission

334-242-2947

APPENDIX A

Acknowledgment of Confidentiality

WC Docket No. 12-375

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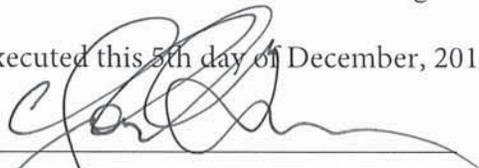
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Executed this 5th day of December, 2014.



John A. Garner

Executive Director

Alabama Public Service Commission

334-242-5200

APPENDIX A**Acknowledgment of Confidentiality**

WC Docket No. 12-375

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Executed this 5th day of December, 2014.



Douglas L. Dillard

Public Utility Field Technician, Senior

Alabama Public Service Commission

334-242-2819

APPENDIX A

Acknowledgment of Confidentiality

WC Docket No. 12-375

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Executed this 5th day of December, 2014.



Luke Bentley

Staff Attorney

Alabama Public Service Commission

334-242-5200

APPENDIX A

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WC Docket No. 12-375

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Executed this 5th day of December, 2014.



Joe Leverette

Public Utility Analyst III

Alabama Public Service Commission

334-242-9568

APPENDIX A

Acknowledgment of Confidentiality

WC Docket No. 12-375

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Executed this 5th day of December, 2014.



David Peeler

Public Utility Analyst Manager

Alabama Public Service Commission

334-242-2947

APPENDIX A

Acknowledgment of Confidentiality

WC Docket No. 12-375

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Executed this 5th day of December, 2014.



Earl C. McArthur III

Public Utility Analyst III

Alabama Public Service Commission

334-242-5851

Collins Declaration

Exhibit 4



STATE OF ALABAMA
PUBLIC SERVICE COMMISSION
P.O. BOX 304260
MONTGOMERY, ALABAMA 36130

TWINKLE ANDRESS CAVANAUGH, PRESIDENT

JOHN A. GARNER, EXECUTIVE DIRECTOR

JEREMY H. ODEN, ASSOCIATE COMMISSIONER

CHRIS "Chip" BEEKER, Jr., ASSOCIATE COMMISSIONER

December 5, 2014

Via Email and Certified Mail

Cherie R. Kiser
Counsel for Global Tel*Link Corporation
Cahill Gordon & Reindel, LLP
Eighty Pine Street
New York, NY 10005-1702

ckiser@cahill.com

Re: WC Docket No. 12-375 – Request for Access to GTL’s Stamped Confidential Documents

Dear Ms. Kiser:

Pursuant to the Protective Order issued on December 19, 2013 in the above-captioned proceeding, I am requesting by way of this letter access to Stamped Confidential Documents and Confidential Information filed by Global Tel*Link Corporation (“GTL”) in this proceeding.

Specifically, I request access to all Stamped Confidential Documents that comprise GTL’s cost study and response to the mandatory data collection that were created pursuant to the Commission’s Instructions and Paragraph 125 of the Inmate Rate Order.

Attached hereto are the executed Acknowledgments of Confidentiality of the persons who request access to the Stamped Confidential Documents: Darrell A. Baker, John A. Garner, Doug Dillard, Luke Bentley, Joe Leverette, David Peeler, and Earl McArthur.

I request a complete set of the Stamped Confidential Documents, and I request that they be sent to me electronically. In addition, I request that, where possible, the Stamped Confidential Documents be sent in a native file format, rather than in a PDF file format. Finally, pursuant to the Protective Order, please consider this a continuing request for additional documents filed in response to the Commission’s Mandatory Data Collection.

I appreciate your prompt response to this request. Please do not hesitate to contact me if you have any questions. Additionally, if you are not the proper person to whom I should direct this request, please advise me accordingly.

Sincerely,

A handwritten signature in black ink that reads "Darrell A. Baker". The signature is written in a cursive style and is set against a light gray rectangular background.

Darrell A. Baker
Director, Utility Services Division
100 North Union Street, RSA Union
Montgomery, Alabama 361004
(334) 242-2947
darrell.baker@psc.alabama.gov

Enclosures

APPENDIX A

Acknowledgment of Confidentiality

WC Docket No. 12-375

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Executed this 5th day of December, 2014.



Darrell A. Baker

Director, Utility Services Division

Alabama Public Service Commission

334-242-2947

APPENDIX A

Acknowledgment of Confidentiality

WC Docket No. 12-375

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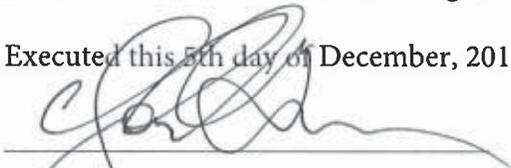
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Executed this 5th day of December, 2014.



John A. Carner

Executive Director

Alabama Public Service Commission

334-242-5200

APPENDIX A**Acknowledgment of Confidentiality****WC Docket No. 12-375**

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Executed this 5th day of December, 2014.



Douglas L. Dillard

Public Utility Field Technician, Senior

Alabama Public Service Commission

334-242-2819

APPENDIX A**Acknowledgment of Confidentiality****WC Docket No. 12-375**

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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 5th day of December, 2014.



Luke Bentley

Staff Attorney

Alabama Public Service Commission

334-242-5200

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.

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Executed this 5th day of December, 2014.



Joe Leverette

Public Utility Analyst III

Alabama Public Service Commission

334-242-9568

APPENDIX A**Acknowledgment of Confidentiality****WC Docket No. 12-375**

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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 5th day of December, 2014.



David Peeler

Public Utility Analyst Manager

Alabama Public Service Commission

334-242-2947

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.

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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 5th day of December, 2014.



Earl C. McArthur III

Public Utility Analyst III

Alabama Public Service Commission

334-242-5851

Collins Declaration

Exhibit 5

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*ADMITTED IN DC ONLY

December 11, 2014

Via Electronic Mail (darrell.baker@psc.alabama.gov)

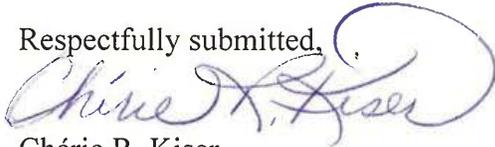
Darrell A. Baker
Director, Utility Services Division
110 North Union Street, RSA Union
Montgomery, AL 361004

Re: **CONFIDENTIAL INFORMATION - SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NO. 12-375 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION - Global Tel*Link Corporation Response to One-Time Mandatory Data Collection**

Dear Mr. Baker:

Enclosed please find Global Tel*Link Corporation's ("GTL") Stamped Confidential Response to the Federal Communications Commission's one-time mandatory data collection. This Confidential Information is provided to you and Messrs. Garner, Dillard, Bentley, Leverette, Peeler and McArthur III, pursuant to and consistent with the terms of the Protective Order, issued in the above-captioned docket. We call your attention to paragraphs 6 and 7 of the Protective Order requiring all copies of documents to be returned or destroyed consistent with paragraph 17, and limiting the use of Confidential Information to this proceeding.

If you have any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

Chérie R. Kiser
Counsel for Global Tel*Link Corporation

Enclosures

Collins Declaration

Exhibit 6

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Proceeding Number	Name of Filer	Law Firm Name	Date Received	Date Posted	Exparte	Type of Filing	Pages
12-375	Darrell A. Baker		07/13/2015	07/13/2015	Yes	NOTICE OF EXPARTE	22
12-375	Darrell A. Baker		07/08/2015	07/09/2015	Yes	NOTICE OF EXPARTE	18
12-375	Darrell A. Baker and Don Wood		07/01/2015	07/02/2015	Yes	NOTICE OF EXPARTE	6

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<u>Proceeding Number</u>	<u>Name of Filer</u>	<u>Law Firm Name</u>	<u>Date Received</u>	<u>Date Posted</u>	<input type="checkbox"/> <u>Exparte</u>	<u>Type of Filing</u>	<u>Pages</u>
12-375	Alabama Public Service Commission		05/22/2015	05/22/2015	Yes	NOTICE OF EXPARTE	4
12-375	Alabama Public Service Commission		05/12/2015	05/13/2015	No	LETTER	2
12-375	Alabama Public Service Commission		02/10/2015	02/13/2015	Yes	NOTICE OF EXPARTE	67
12-375	Alabama Public Service Commission		01/30/2015	02/02/2015	Yes	NOTICE OF EXPARTE	67
12-375	Alabama Public Service Commission		01/26/2015	01/29/2015	Yes	NOTICE OF EXPARTE	142
12-375	Alabama Public Service Commission		01/16/2015	01/16/2015	Yes	NOTICE OF EXPARTE	142
12-375	Alabama Public Service Commission		12/05/2014	12/08/2014	No	PRODUCTION OF DOCUMENTS	9
12-375	Alabama Public Service Commission		09/30/2014	10/01/2014	No	REPLY TO COMMENTS	12

Showing results 1 through 8 of 8

Collins Declaration

Exhibit 7

REDACTED VERSION FOR PUBLIC VIEW

July 8, 2015

By Electronic Filing

Notice of Ex Parte Presentation

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

**Re: WC Docket No. 12-375, Darrell A. Baker Ex Parte Presentation on Jail and
Prison Costs, Rates, and Facility Cost Recovery**

Dear Ms. Dortch:

On July 6, 2015, Darrell Baker, Director, Utility Services Division, Alabama Public Service Commission¹, met via conference call with Pamela Arluk, Madeleine Findley, Gil Strobel, Bakari Middleton, Thomas Parisi, Miriam Strauss, and Don Sussman of the Pricing Policy Division, Competition Policy Division, and Wireline Competition Bureau to discuss Mr. Baker's further analysis of provider specific costs and facility compensation included in the record for the above referenced proceeding. Baker's additional analysis, presented herein, is based upon more comprehensive and in depth review of confidential provider costs.

For his analysis, Baker relied on cost support submitted to the Commission by:

Securus Technologies, Inc. ("Securus")²
Global Tel*Link Corporation ("GTL")³
Pay Tel Communications, Inc. ("Pay Tel")⁴
Network Communications International Corp. ("NCIC")⁵

¹ Mr. Baker prefaced his remarks to the Commission by stating that his comments do not necessarily reflect the views of the Alabama Public Service Commission ("APSC"), nor should his comments be construed as a change or contemplated change to the ratemaking policies of the APSC as expressed in its Orders under APSC Docket 15957 (Re: Generic Proceeding Considering the Promulgation of Telephone Rules Governing Inmate Phone Service).

² WC Docket No. 12-375, Securus Technologies, Inc., Response to Mandatory Data Collection, July 17, 2014.

³ WC Docket No. 12-375, Global Tel*Link Corporation, Response to Mandatory One-Time Data Collection, August 22, 2014.

⁴ WC Docket No. 12-375, Pay Tel Communications, Inc., Response to Mandatory Data Collection, August 18, 2014.

Telmate, LLC (“Telmate”)⁶
Inmate Calling Solutions, LLC (“ICSolutions”)⁷
CenturyLink⁸

Baker reasoned that the above providers serve the overwhelming majority of jails and prisons and that an analysis of their data should provide accurate and reliable results that are applicable across the entire industry. He used the 2013 cost study dataset for the analysis.

JAILS

Costs, revenue producing minutes of use (“MOU”), and commissions paid were reported by facility size based on average daily [inmate] population (“ADP”) and by call type, i.e. debit, prepaid and collect. For each provider and in accordance with facility size, Baker summed the costs and the MOUs. He then divided the accumulated costs for each facility size category by the accumulated MOUs associated therewith to arrive at the cost per MOU by provider and thereafter, consolidated the results for all providers as shown in Exhibit A, attached hereto.

One provider’s cost per MOU deviate substantially from the cost per MOU of other providers. Baker attributes the deviation to the provider’s allocation of common costs which appears disproportionate to the common cost allocation reported by other providers, particularly for debit and collect calls. Consequently, he elected to exclude that provider’s data from the composite cost calculations.

The composite cost per MOU by facility size, is shown on Exhibit A. It ranges from \$0.213/min for jails with less than 100 ADP to \$0.159/min for jails of greater than 1000 ADP and includes the Commission’s authorized return on capital. For the provider proportion of jail rates, Baker recommends:

\$0.22/min for jails of <100 ADP;
\$0.18/min for jails of 100 to 349 ADP;
\$0.17/min for jails of 350 to 999 ADP;
\$0.16/min for jails with ADP >1000.

The recommended rates incorporate the observed trend for decreasing cost per MOU with increasing facility size.

⁵ WC Docket No. 12-375, Network Communications International Corp., Response to Mandatory Data Collection, August 18, 2014.

⁶ WC Docket No. 12-375, Telmate, LLC, Response to Mandatory One-Time Data Collection, August 18, 2014.

⁷ Second Supplemental Response to Mandatory Data Collection; WC Docket No. 12-375, Inmate Calling Solutions, LLC, August 28, 2014.

⁸ In the Matter of Rates for Interstate Inmate Calling Services, WC Docket No. 12-375 – CenturyLink Complete Response to Mandatory Data Collection, September 16, 2014.

For each provider and in accordance with facility size, Baker summed the MOUs and the commissions paid for each call type. The data for debit and prepaid calls are consolidated into a single category identified as prepaid calls. He then divided the accumulated commissions paid for each facility size category by the accumulated MOUs associated therewith to arrive at commissions paid per MOU by provider and, thereafter, consolidated the results for all providers as shown in Exhibit B, attached hereto.

One provider's commissions per MOU deviate substantially from the commissions per MOU of other providers. Baker attributes the deviation to either overstated commissions or understated MOUs. Consequently, he elected to exclude that provider's data from the composite facility commission calculations.

Exhibit C attached hereto, shows jail cost recovery scenarios based on facility size. From Exhibit B, the calculated commission per MOU, for each facility size, is selected as the starting point upon which to compare various levels of facility cost recovery. The chart shows the resulting reduction from current commissions based on various cost recovery rates. The cost recovery rate of previous commenters for this proceeding is also shown for purposes of comparison. Using a facility cost recovery rate of \$0.04 per MOU results in commission reductions that range from 58% for facilities with ADP <100 to 68% for facilities with ADP >1000. The result is an overall reduction in facility compensation of approximately two-thirds with a slightly lower reduction for the smaller jails and slightly more for the largest jails. Consequently, Baker revises his recommendation for jails cost recovery from the June 30, 2015 Baker/Wood Ex Parte filing⁹ to \$0.04/min for jails of all sizes.

Baker points to the May 8, 2015 Pay Tel Ex Parte filing¹⁰ which takes the National Sheriff's Association ("NSA") facility cost survey results, eliminates the data that deviates excessively from the mean values or that is based on incomplete entries, and computes a revised facility cost of \$0.094/min for jails with 1-349 ADP and \$0.059/min for jails with ADP greater than 349. Baker halved the Pay Tel revised NSA facility cost estimate to produce an extremely conservative estimate for facility cost. The result is a composite cost recovery requirement of approximately \$0.04/min which supports the facility cost recovery rate selected in Exhibit C.

Combining the recommended provider rates from Exhibit A with \$0.04/min facility cost recovery produces the following end user jail rates for each facility size:

⁹ WC Docket No. 12-375, Notice of Ex Parte Presentation, submitted by Darrell Baker and Don Wood, June 30, 2015.

¹⁰ *Setting the Record Straight on Confinement Facility Costs*, Notice of Ex Parte Presentation, submitted by Pay Tel, Exhibit B, May 8, 2015

COST SUPPORTED JAIL END USER RATE

ADP	Provider Recovery Rate/Min	Facility Recovery Rate/Min	End User Rate/Min
<100	\$0.22	\$0.04	\$0.26
100-349	\$0.18	\$0.04	\$0.22
350-1000	\$0.17	\$0.04	\$0.21
>1000	\$0.16	\$0.04	\$0.20

PRISONS

For each prison provider and in accordance with facility size, Baker sums the costs, revenue producing MOUs, and the commissions paid. He then divides the accumulated costs for each facility size category by the accumulated MOUs associated therewith for all call types to arrive at the cost per MOU by provider. Thereafter, he consolidates the results for all providers as shown in Exhibit D, attached hereto. Exhibit D also shows the commissions paid by each provider and the total commissions paid by all providers in accordance with facility size.

The results are counterintuitive. The cost per MOU is lowest for the smallest facilities (up to 4999 ADP), increases for the medium sized facilities, then decreases marginally for the largest sized facilities. Baker surmises that equipment costs, particularly telecommunications bandwidth, increases disproportionately for the medium and large sized prisons. The added costs are spread over a higher number of MOUs for the largest prisons resulting in slightly lower average cost per MOU as compared to the medium sized facilities. The results are very consistent among the prison providers. Based on the cost study analysis, Baker recommends provider rates of \$.08/min for facilities with 1-4999 ADP, \$.12/min for facilities with 5000-19999 ADP, and \$.10/min for facilities with ADP >20000. The composite rate for all prisons is \$.10/min.

Exhibit D shows that the smallest facilities are receiving the lowest commissions per MOU (\$.024/min) while the medium and large sized facilities are receiving higher commissions of \$.087/min and \$.064/min respectively. Exhibit E attached hereto, shows prison cost recovery scenarios based on facility size. From Exhibit D, the calculated commission per MOU, for each facility size, is selected as the starting point upon which to compare various levels of facility cost recovery. The chart shows the resulting reduction from current commissions based on various cost recovery rates. The cost recovery rate of previous commenters for this proceeding is also shown for purposes of comparison. Using a facility cost recovery rate of \$.02 per MOU results in commission reductions that range from 17% for facilities with 1-4999 ADP to 77% for facilities with 5000-19999 ADP. Prisons with ADP of >20000 will experience a 69% reduction in compensation. If the intent is to cut facility cost recovery by a similar amount, \$.01/min is the recommended cost recovery for prisons of 1-4999 ADP. However, as discussed previously, this facility size category is currently receiving a very low level of compensation (\$.024/min) which is just slightly above the \$.02/min compensation

recommended for the medium and large size prisons. A cut from \$0.024/min to \$0.02/min is small in terms of the existing level of compensation but is likely a fair reduction considering that the larger prisons are currently receiving compensation up to four times that rate. Baker's recommendation for prison cost recovery is the same as the rate recommended in the June 30, 2015 Baker/Wood Ex Parte presentation with the exception of an alternative recovery rate of \$0.01/min for prisons with 1-4999 ADP.

Combining the recommended provider rates from Exhibit D with the recommended facility cost recovery produces the following end user prison rates for each facility size:

COST SUPPORTED PRISON END USER RATE

ADP	Provider Recovery Rate/Min	Facility Recovery Rate/Min	End User Rate/Min
1 – 4999 (low)	\$0.08	\$0.01	\$0.09
1-4999 (high)	\$0.08	\$0.02	\$0.10
5000 - 19999	\$0.12	\$0.02	\$0.14
>19999	\$0.10	\$0.02	\$0.12

OTHER RECOMMENDATIONS

Baker advised the Commission that intrastate ICS rates in some states include an operator surcharge component. Some states provide for caps on local and/or toll calls. A uniform intrastate rate framework will affect inmate calling behavior differently depending on each state's existing intrastate rate framework. Baker recommends a second look at facility cost per MOU and compensation per MOU two to three years following implementation of a uniform rate framework.

Baker stated that lack of transparency in the ICS industry is problematic. He recommends that providers be required to list on their website, by state, the facilities served by the provider along with the rates and fees assessed end users at the facility. Additionally, Baker recommends that providers be required to submit to the Commission and to state commissions, upon request or routinely if requested, a copy of the contract for each facility served as well as the provider's response to any facility invitation to bid or request for proposal. Such documents will provide insight into the basis upon which the winning bidder is selected. Moreover, providers should be required to provide federal and state regulators with online access to inmate calling records upon visiting the facility and to non-inmate account statements upon request for purposes of verifying compliance with ICS rate/fee caps.

With adoption of capped facility cost recovery rates, there is no excuse for maintaining excessive ancillary fees and charges for single call products that are used by some providers to subsidize exorbitant site commission offerings. Baker recommends that the Commission adopt the ancillary fee caps approved by the Alabama Public Service Commission in its December 9,

2014 Order for ICS. Additionally, he recommends that single payment calls be priced in accordance with the rate and payment fee caps applicable to the facility from which the call originates. Moreover, Baker reminds the Commission that \$13 of the \$14.99 charge for single calls paid via credit card is considered a transaction fee. A proportionately similar transaction fee is applicable to single pay calls billed to the call recipient's serving carrier. Any request to grandfather fees for these or other services should be rejected. Indeed, if the providers are allowed to charge capped rates for the call portion of the single pay charge while grandfathering the existing "transaction fee" portion of the call, the Commission may be authorizing de facto increases in single payment call prices.

Baker advised the Commission that integration of inmate trust fund and ICS payment platforms within the facility may provide opportunities for providers to circumvent the payment fee caps adopted for ICS. Additionally, in-kind payments may escalate with the adoption of a capped facility cost recovery framework. He recommends a Third FNPRM to address these and other issues.

Enclosed are copies of the exhibits referenced herein. Please do not hesitate to contact me should you have any questions.

Sincerely yours,

/s/ Darrell Baker

Darrell Baker

cc via email to:

Pamela Arluk, Chief of the Pricing Policy Division
Lynne Engledow, Acting Deputy Chief of the Pricing Policy Division
Gil Strobel, Deputy Chief, Pricing Policy Division
Madeleine Findley, Acting Deputy Bureau Chief, WCB
Bakari Middleton, Attorney, Competition Policy Division
Thomas Parisi, Attorney, Pricing Policy Division
Don Sussman, Telecom Analyst, Pricing Policy Division
Miriam Strauss, Intern, Pricing Policy Division

JAILS - PROVIDER A (ALL CALLS)

ADP	Reported Total Cost	Reported MOU	Reported Cost Per MOU	Facilities
<100				
100-349				
350 -999				
>1000				
TOTAL				

JAILS - PROVIDER B (ALL CALLS)

ADP	Reported Total Cost	Reported MOU	Reported Cost Per MOU	Facilities
<100				
100-349				
350 -999				
>1000				
TOTAL				

JAILS - PROVIDER C (ALL CALLS)

ADP	Reported Total Cost	Reported MOU	Reported Cost Per MOU	Facilities
<100				
100-349				
350 -999				
>1000				
TOTAL				

JAILS - PROVIDER D (ALL CALLS)

ADP	Reported Total Cost	Reported MOU	Reported Cost Per MOU	Facilities
<100				
100-349				
350 -999				
>1000				
TOTAL				

JAILS - PROVIDER E (ALL CALLS)

ADP	Reported Total Cost	Reported MOU	Reported Cost Per MOU	Facilities
<100				
100-349				
350 -999				
>1000				
TOTAL				

JAILS - PROVIDER F (ALL CALLS)

ADP	Reported Total Cost	Reported MOU	Reported Cost Per MOU	Facilities
<100				
100-349				
350 -999				
>1000				
TOTAL				

JAILS - PROVIDER G (ALL CALLS)

ADP	Reported Total Cost	Reported MOU	Reported Cost Per MOU	Facilities
<100				
100-349				
350 -999				
>1000				
TOTAL				

JAILS - ALL PROVIDERS (ALL CALLS)

ADP	Reported Total Cost	Reported MOU	Reported Cost Per MOU	Facilities
<100	\$31,667,503	88,271,898	\$0.359	1330
100-349	\$83,527,576	321,070,887	\$0.260	952
350 -999	\$111,910,378	581,808,337	\$0.192	570
>1000	\$220,408,913	1,338,760,312	\$0.165	810
TOTAL	\$447,514,370	2,329,911,434	\$0.192	3662

JAILS - Excluding Provider C (ALL CALLS)

ADP	Reported Total Cost	Reported MOU	Reported Cost Per MOU	Facilities	Proposed Rate/Min
<100	\$9,473,604	44,400,813	\$0.213	579	\$0.22
100-349	\$30,965,289	182,322,428	\$0.170	479	\$0.18
350 -999	\$65,143,012	391,514,045	\$0.166	383	\$0.17
>1000	\$158,193,309	992,774,596	\$0.159	646	\$0.16
TOTAL	\$263,775,214	1,611,011,882	\$0.164	2087	

JAILS PROVIDER G

	2013 Commissions Prepaid Calls	2013 MOU Prepaid Calls	2013 Prepaid Commissions Per MOU	2013 Commissions Collect Calls	2013 MOU Collect Calls	2013 Collect Call Commissions Per MOU	2013 Total Commissions	2013 Total MOU	2013 Total Commissions Per MOU	2013 Facilities	2013 Commission Per Facility
ADP											
<100											
100-349											
350 -999											
>1000											
TOTAL											

JAILS (ALL)

	2013 Commissions Prepaid Calls	2013 MOU Prepaid Calls	2013 Prepaid Commissions Per MOU	2013 Commissions Collect Calls	2013 MOU Collect Calls	2013 Collect Call Commissions Per MOU	2013 Total Commissions	2013 Total MOU	2013 Total Commissions Per MOU	2013 Facilities	2013 Commission Per Facility
ADP											
<100	\$9,703,835	77,253,276	\$0.1256	\$1,187,244	11,087,495	\$0.1071	\$10,891,079	88,340,771	\$0.123	1,330	\$8,188.78
100-349	\$31,901,452	292,056,992	\$0.1092	\$3,489,180	29,081,896	\$0.1200	\$35,390,632	321,138,888	\$0.110	952	\$37,175.03
350 -999	\$66,058,997	542,703,882	\$0.1217	\$6,580,408	39,206,062	\$0.1678	\$72,639,405	581,909,944	\$0.125	568	\$127,886.28
>1000	\$155,288,076	1,249,566,979	\$0.1243	\$15,095,314	89,792,943	\$0.1681	\$170,383,390	1,339,359,922	\$0.127	805	\$211,656.39
TOTAL	\$262,952,360	\$2,161,581,129	\$0.1216	\$26,352,146	169,168,396	\$0.1558	\$289,304,506	2,330,749,525	\$0.124	3,655	\$79,153.08

JAILS (ALL EXCLUDING PROVIDER B)

	2013 Commissions Prepaid Calls	2013 MOU Prepaid Calls	2013 Prepaid Commissions Per MOU	2013 Commissions Collect Calls	2013 MOU Collect Calls	2013 Collect Call Commissions Per MOU	2013 Total Commissions	2013 Total MOU	2013 Total Commissions Per MOU	2013 Facilities	2013 Commission Per Facility
ADP											
<100	\$6,568,498	\$67,977,426	\$0.0966	\$938,098	10,640,718	\$0.0882	\$7,506,596	78,618,144	\$0.095	1,021	\$7,352.20
100-349	\$29,781,609	\$283,094,138	\$0.1052	\$3,359,869	28,719,833	\$0.1170	\$33,141,478	311,813,971	\$0.106	903	\$36,701.53
350 -999	\$62,958,983	\$528,359,600	\$0.1192	\$6,436,434	38,679,951	\$0.1664	\$69,395,417	567,039,551	\$0.122	547	\$126,865.48
>1000	\$152,495,221	\$1,239,396,232	\$0.1230	\$15,015,550	89,619,786	\$0.1675	\$167,510,771	1,329,016,018	\$0.126	799	\$209,650.53
TOTAL	\$251,804,311	\$2,118,827,396	\$0.1188	\$25,749,951	167,660,288	\$0.1536	\$277,554,262	2,286,487,684	\$0.121	3,270	\$84,878.98

JAIL ADP <100 COST RECOVERY SCENARIOS AND RESULTS

Cost Recovery Rate/Min	% Reduction in Current Avg Recovery/MOU	Total MOUs	Cost Recovery Rate/Min X MOU	Existing Site Commissions	Existing Commissions Per Facility	Cost Recovery Per Facility Going Forward	Monthly Recovery Going Forward
\$0.0955	0.0%	78,618,144	\$7,506,596	\$11,436,102	\$7,352	\$7,352	\$613
\$0.09	5.8%	78,618,144	\$7,075,633	\$11,436,102	\$7,352	\$6,930	\$578
\$0.08	16.2%	78,618,144	\$6,289,452	\$11,436,102	\$7,352	\$6,160	\$513
\$0.07	26.7%	78,618,144	\$5,503,270	\$11,436,102	\$7,352	\$5,390	\$449
\$0.06	37.2%	78,618,144	\$4,717,089	\$11,436,102	\$7,352	\$4,620	\$385
\$0.05	47.6%	78,618,144	\$3,930,907	\$11,436,102	\$7,352	\$3,850	\$321
\$0.04	58.1%	78,618,144	\$3,144,726	\$11,436,102	\$7,352	\$3,080	\$257
\$0.03	68.6%	78,618,144	\$2,358,544	\$11,436,102	\$7,352	\$2,310	\$193
\$0.02	79.1%	78,618,144	\$1,572,363	\$11,436,102	\$7,352	\$1,540	\$128
0.0160	83.2%	78,618,144	\$1,257,890	\$11,436,102	\$7,352	\$1,232	\$103
\$0.01	89.5%	78,618,144	\$786,181	\$11,436,102	\$7,352	\$770	\$64

CURRENT

Baker/Wood

Baker Revised

Lipman

Economist Inc

JAIL ADP 100-349 COST RECOVERY SCENARIOS AND RESULTS

Cost Recovery Rate/Min	% Reduction in Current Avg Recovery/MOU	Total MOUs	Cost Recovery Rate/Min X MOU	Existing Site Commissions	Existing Commissions Per Facility	Cost Recovery Per Facility Going Forward	Monthly Recovery Going Forward
\$0.1063	0.0%	311,813,971	\$33,141,478	\$33,141,478	\$36,702	\$36,702	\$3,058
\$0.10	5.9%	311,813,971	\$31,181,397	\$33,141,478	\$36,702	\$34,531	\$2,878
\$0.09	15.3%	311,813,971	\$28,063,257	\$33,141,478	\$36,702	\$31,078	\$2,590
\$0.08	24.7%	311,813,971	\$24,945,118	\$33,141,478	\$36,702	\$27,625	\$2,302
\$0.07	34.1%	311,813,971	\$21,826,978	\$33,141,478	\$36,702	\$24,172	\$2,014
\$0.06	43.6%	311,813,971	\$18,708,838	\$33,141,478	\$36,702	\$20,719	\$1,727
\$0.05	53.0%	311,813,971	\$15,590,699	\$33,141,478	\$36,702	\$17,265	\$1,439
\$0.04	62.4%	311,813,971	\$12,472,559	\$33,141,478	\$36,702	\$13,812	\$1,151
\$0.03	71.8%	311,813,971	\$9,354,419	\$33,141,478	\$36,702	\$10,359	\$863
\$0.02	81.2%	311,813,971	\$6,236,279	\$33,141,478	\$36,702	\$6,906	\$576
0.0160	84.9%	311,813,971	\$4,989,024	\$33,141,478	\$36,702	\$5,525	\$460
\$0.01	90.6%	311,813,971	\$3,118,140	\$33,141,478	\$36,702	\$3,453	\$288

CURRENT

Baker/Wood

Baker Revised

Lipman

Economist Inc

JAIL ADP 350-1000 COST RECOVERY SCENARIOS AND RESULTS

Cost Recovery Rate/Min	% Reduction in Current Avg Recovery/MOU	Total MOUs	Cost Recovery Rate/Min X MOU	Existing Site Commissions	Existing Commissions Per Facility	Cost Recovery Per Facility Going Forward	Monthly Recovery Going Forward
\$0.1224	0.0%	567,039,551	\$69,395,417	\$69,395,417	\$126,865	\$44,005	\$3,667
\$0.12	2.0%	567,039,551	\$68,044,746	\$69,395,417	\$126,865	\$43,148	\$3,596
\$0.11	10.1%	567,039,551	\$62,374,351	\$69,395,417	\$126,865	\$39,553	\$3,296
\$0.10	18.3%	567,039,551	\$56,703,955	\$69,395,417	\$126,865	\$35,957	\$2,996
\$0.09	26.5%	567,039,551	\$51,033,560	\$69,395,417	\$126,865	\$32,361	\$2,697
\$0.08	34.6%	567,039,551	\$45,363,164	\$69,395,417	\$126,865	\$28,765	\$2,397
\$0.07	42.8%	567,039,551	\$39,692,769	\$69,395,417	\$126,865	\$25,170	\$2,097
\$0.06	51.0%	567,039,551	\$34,022,373	\$69,395,417	\$126,865	\$21,574	\$1,798
\$0.05	59.2%	567,039,551	\$28,351,978	\$69,395,417	\$126,865	\$17,978	\$1,498
\$0.04	67.3%	567,039,551	\$22,681,582	\$69,395,417	\$126,865	\$14,383	\$1,199
\$0.03	75.5%	567,039,551	\$17,011,187	\$69,395,417	\$126,865	\$10,787	\$899
\$0.02	83.7%	567,039,551	\$11,340,791	\$69,395,417	\$126,865	\$7,191	\$599
\$0.0160	86.9%	567,039,551	\$9,072,633	\$69,395,417	\$126,865	\$5,753	\$479
\$0.01	91.8%	567,039,551	\$5,670,396	\$69,395,417	\$126,865	\$3,596	\$300

Baker/Wood
Baker Revised

Lipman
Economist Inc

JAIL ADP >1000 COST RECOVERY SCENARIOS AND RESULTS

Cost Recovery Rate/Min	% Reduction in Current Avg Recovery/MOU	Total MOUs	Cost Recovery Rate/Min X MOU	Existing Site Commissions	Existing Commissions Per Facility	Cost Recovery Per Facility Going Forward	Monthly Recovery Going Forward
\$0.1260	0.0%	1,329,016,018	\$167,510,771	\$167,510,771	\$209,651	\$209,651	\$17,471
\$0.12	4.8%	1,329,016,018	\$159,481,922	\$167,510,771	\$209,651	\$199,602	\$16,633
\$0.11	12.7%	1,329,016,018	\$146,191,762	\$167,510,771	\$209,651	\$182,968	\$15,247
\$0.10	20.6%	1,329,016,018	\$132,901,602	\$167,510,771	\$209,651	\$166,335	\$13,861
\$0.09	28.6%	1,329,016,018	\$119,611,442	\$167,510,771	\$209,651	\$149,701	\$12,475
\$0.08	36.5%	1,329,016,018	\$106,321,281	\$167,510,771	\$209,651	\$133,068	\$11,089
\$0.07	44.4%	1,329,016,018	\$93,031,121	\$167,510,771	\$209,651	\$116,434	\$9,703
\$0.06	52.4%	1,329,016,018	\$79,740,961	\$167,510,771	\$209,651	\$99,801	\$8,317
\$0.05	60.3%	1,329,016,018	\$66,450,801	\$167,510,771	\$209,651	\$83,167	\$6,931
\$0.04	68.3%	1,329,016,018	\$53,160,641	\$167,510,771	\$209,651	\$66,534	\$5,544
\$0.03	76.2%	1,329,016,018	\$39,870,481	\$167,510,771	\$209,651	\$49,900	\$4,158
\$0.02	84.1%	1,329,016,018	\$26,580,320	\$167,510,771	\$209,651	\$33,267	\$2,772
\$0.0160	87.3%	1,329,016,018	\$21,264,256	\$167,510,771	\$209,651	\$26,614	\$2,218
\$0.01	92.1%	1,329,016,018	\$13,290,160	\$167,510,771	\$209,651	\$16,633	\$1,386

Baker/Wood Max
Baker Revised
Baker/Wood Min

Economist Inc
Lipman

PRISONS - PROVIDER C (ALL CALLS)

ADP	Reported Total Cost	Reported MOU	Reported Cost Per MOU	Facilities	Site Commissions	Commission Per MOU
1-4999						
5000-19999						
>19999						
TOTAL						

PRISONS - PROVIDER D (ALL CALLS)

ADP	Reported Total Cost	Reported MOU	Reported Cost Per MOU	Facilities	Site Commissions	Commission Per MOU
1-4999						
5000-19999						
>19999						
TOTAL						

PRISONS - PROVIDER E (ALL CALLS)

ADP	Reported Total Cost	Reported MOU	Reported Cost Per MOU	Facilities	Site Commissions	Commission Per MOU
1-4999						
5000-19999						
>19999						
TOTAL						

PRISONS - PROVIDER F (ALL CALLS)

ADP	Reported Total Cost	Reported MOU	Reported Cost Per MOU	Facilities	Site Commissions	Commission Per MOU
1-4999						
5000-19999						
>19999						
TOTAL						

PRISONS - PROVIDER G (ALL CALLS)

ADP	Reported Total Cost	Reported MOU	Reported Cost Per MOU	Facilities	Site Commissions	Commission Per MOU
1-4999						
5000-19999						
>19999						
TOTAL						

PRISONS - ALL PROVIDERS (ALL CALLS)

ADP	Reported Total Cost	Reported MOU	Reported Cost Per MOU	Facilities	Site Commissions	Commission Per MOU	Proposed Rate/Min
1-4999	\$8,724,648	121,324,458	\$0.072	77	\$2,966,253	\$0.024	\$0.080
5000-19999	\$58,669,486	481,227,369	\$0.122	400	\$41,750,445	\$0.087	\$0.120
>19999	\$163,198,853	1,625,236,984	\$0.100	1,054	\$104,668,010	\$0.064	\$0.100
TOTAL	\$230,592,987	2,227,788,811	\$0.104	1531	\$149,384,708	\$0.067	

PRISON ADP 1-4999 COST RECOVERY SCENARIOS AND RESULTS

Cost Recovery Rate/Min	% Reduction in Current Avg Recovery/MOU	Total MOUs	Annual Cost Recovery	Existing Site Commissions	Facilities	Commissions Per Facility	Cost Recovery Per Facility Going Forward
\$0.024	0.0%	121,324,458	\$2,966,253	\$2,966,253	77	\$38,522.76	\$38,523
\$0.02	16.7%	121,324,458	\$2,426,489	\$2,966,253	77	\$38,522.76	\$31,513
\$0.01	58.3%	121,324,458	\$1,213,245	\$2,966,253	77	\$38,522.76	\$15,756
\$0.0050	79.2%	121,324,458	\$606,622	\$2,966,253	77	\$38,522.76	\$7,878

CURRENT
Baker/Wood
Lipman Baker Low
Economist Inc

PRISON ADP 5000-19999 COST RECOVERY SCENARIOS AND RESULTS

Cost Recovery Rate/Min	% Reduction in Current Avg Recovery/MOU	Total MOUs	Annual Cost Recovery	Existing Site Commissions	Facilities	Commissions Per Facility	Cost Recovery Per Facility Going Forward
\$0.087	0.0%	481,227,369	\$41,750,445	\$41,750,445	400	\$104,376	\$104,376
\$0.08	8.0%	481,227,369	\$38,498,190	\$41,750,445	400	\$104,376	\$96,245
\$0.07	19.5%	481,227,369	\$33,685,916	\$41,750,445	400	\$104,376	\$84,215
\$0.06	31.0%	481,227,369	\$28,873,642	\$41,750,445	400	\$104,376	\$72,184
\$0.05	42.5%	481,227,369	\$24,061,368	\$41,750,445	400	\$104,376	\$60,153
\$0.04	54.0%	481,227,369	\$19,249,095	\$41,750,445	400	\$104,376	\$48,123
\$0.03	70.4%	481,227,369	\$12,401,243	\$41,750,445	400	\$104,376	\$31,003
\$0.02	77.0%	481,227,369	\$9,624,547	\$41,750,445	400	\$104,376	\$24,061
\$0.01	88.5%	481,227,369	\$4,812,274	\$41,750,445	400	\$104,376	\$12,031
\$0.0050	94.3%	481,227,369	\$2,406,137	\$41,750,445	400	\$104,376	\$6,015

CURRENT
Baker/Wood
Lipman
Economist Inc

PRISON ADP >19999 COST RECOVERY SCENARIOS AND RESULTS

Cost Recovery Rate/Min	% Reduction in Current Avg Recovery/MOU	Total MOUs	Annual Cost Recovery	Existing Site Commissions	Facilities	Commissions Per Facility	Cost Recovery Per Facility Going Forward
\$0.064	0.0%	1,625,236,984	\$104,668,010	\$104,668,010	1,054	\$99,306	\$99,306
\$0.06	6.3%	1,625,236,984	\$97,514,219	\$104,668,010	1,054	\$99,306	\$92,518
\$0.05	21.9%	1,625,236,984	\$81,261,849	\$104,668,010	1,054	\$104,376	\$77,099
\$0.04	37.5%	1,625,236,984	\$65,009,479	\$104,668,010	1,054	\$104,376	\$61,679
\$0.03	59.7%	1,625,236,984	\$41,882,402	\$104,668,010	1,054	\$104,376	\$39,737
\$0.02	68.8%	1,625,236,984	\$32,504,740	\$104,668,010	1,054	\$104,376	\$30,839
\$0.01	84.4%	1,625,236,984	\$16,252,370	\$104,668,010	1,054	\$104,376	\$15,420
\$0.0050	92.2%	1,625,236,984	\$8,126,185	\$104,668,010	1,054	\$104,376	\$7,710

CURRENT

Baker/Wood

Lipman

Economist Inc

Collins Declaration

Exhibit 8

Collins, Angela

From: Collins, Angela
Sent: Thursday, July 09, 2015 11:59 AM
To: Jason.Brown@fcc.gov; Geraldine.Taylor@fcc.gov
Cc: Baker, Darrell (Darrell.Baker@psc.alabama.gov); Kiser, Chérie R.
Subject: Removal of confidential information from ECFS

Dear Jason and Geraldine:

Confidential information was posted in ECFS today, and includes the confidential information of my client that is subject to a protective order. Can you please remove this posting?

The docket is WC Docket No. 12-375. It was posted by Darrell A. Baker as a Notice of Ex-Parte. It was received 7/8/2015 and posted 7/9/2015. The link is: <http://apps.fcc.gov/ecfs/comment/view?id=60001091948>. It is labeled as "Confidential Information Subject to Protective Order in WC Docket No. 12-375 before the Federal Communications Commission." It consists of 6 documents (a cover letter and 5 attachments). A redacted version also has been posted.

Please contact me if you have any questions or need additional information.

Thank you,
Angela

Angela F. Collins | Counsel
Cahill Gordon & Reindel LLP
1990 K Street, N.W., Suite 950, Washington, D.C. 20006
t: +1.202.862.8930 | f: +1.866.814.6582 | acollins@cahill.com

CAHILL

Collins Declaration

Exhibit 9

Collins, Angela

From: Baker, Darrell <Darrell.Baker@psc.alabama.gov>
Sent: Thursday, July 09, 2015 2:20 PM
To: Collins, Angela
Subject: RE: Removal of confidential information from ECFS

Did I submit it incorrectly?

I submitted a redacted version clearly identified as such and labeled for public view.

I submitted a separate confidential version clearly identified (in red font) as confidential. Even the file names for confidential info included the term "confidential".

I apologize for the confusion that ensued.

Respectfully,

Darrell A. Baker

Director, Utility Services Division
Alabama Public Service Commission
Work (334) 242-2947
Toll Free (800) 882-3919

From: Collins, Angela [<mailto:ACollins@cahill.com>]
Sent: Thursday, July 09, 2015 10:59 AM
To: Jason.Brown@fcc.gov; Geraldine.Taylor@fcc.gov
Cc: Baker, Darrell; Kiser, Chérie R.
Subject: Removal of confidential information from ECFS

Dear Jason and Geraldine:

Confidential information was posted in ECFS today, and includes the confidential information of my client that is subject to a protective order. Can you please remove this posting?

The docket is WC Docket No. 12-375. It was posted by Darrell A. Baker as a Notice of Ex-Parte. It was received 7/8/2015 and posted 7/9/2015. The link is: <http://apps.fcc.gov/ecfs/comment/view?id=60001091948>. It is labeled as "Confidential Information Subject to Protective Order in WC Docket No. 12-375 before the Federal Communications Commission." It consists of 6 documents (a cover letter and 5 attachments). A redacted version also has been posted.

Please contact me if you have any questions or need additional information.

Thank you,

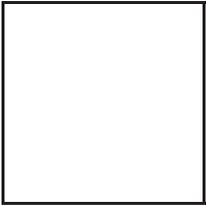
Angela

Angela F. Collins | Counsel

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Collins Declaration

Exhibit 10

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Rates for Interstate Inmate Calling Services) WC Docket No. 12-375
)
_____)

**GLOBAL TEL*LINK CORPORATION
OBJECTION TO DISCLOSURE OF CONFIDENTIAL INFORMATION**

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Senior Vice President and General Counsel
GLOBAL TEL*LINK CORPORATION
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ckiser@cahill.com
acollins@cahill.com

Dated: September 12, 2014

Its Attorneys

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Rates for Interstate Inmate Calling Services) WC Docket No. 12-375
)
)
_____)

**GLOBAL TEL*LINK CORPORATION
OBJECTION TO DISCLOSURE OF CONFIDENTIAL INFORMATION**

Global Tel*Link Corporation (“GTL”),¹ by its attorneys, hereby objects to the request of counsel for Pay Tel Communications, Inc. (“Pay Tel”) to obtain the confidential version of GTL’s response to the Commission’s one-time mandatory data collection (hereinafter “Data Response”), filed August 22, 2014, in the above-referenced docket.²

BACKGROUND

Under the *Protective Order* adopted by the Commission, “Confidential Information” is “information that is not otherwise available from publicly available sources and that is subject to protection under the Freedom of Information Act (‘FOIA’), 5 U.S.C. § 552, and the Commission’s implementing rules.”³ The *Protective Order* states that a party “designating documents and information as Confidential” pursuant to the *Protective Order* “will be deemed to have submitted a request that the material not be made routinely available for public inspection under the Commission’s rules.”⁴

¹ This Objection 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.

² *Rates for Interstate Inmate Calling Services*, 28 FCC Rcd 14107 (2013) (“*Inmate Calling Report and Order and FNPRM*”), *pets. for stay granted in part sub nom. Securus Tech., Inc. v. FCC*, No. 13-1280 (D.C. Cir. Jan.13, 2014) (“*Partial Stay Order*”), *pets. for review pending sub nom. Securus Tech., Inc. v. FCC*, No. 13-1280 (D.C. Cir. filed Nov. 14, 2013) (and consolidated cases).

³ *Rates for Interstate Inmate Calling Services*, 28 FCC Rcd 16954, ¶ 2 (2013) (“*Protective Order*”).

⁴ *Protective Order* ¶ 3 (citing 47 C.F.R. §§ 0.459(a), 0.459(a)(3)).

FOIA specifically exempts from disclosure “trade secrets and commercial or financial information obtained from a person and privileged or confidential” information.⁵ Similarly, the Commission’s rules state that such information is not routinely available for public inspection.⁶ The Commission’s rules also allow parties to seek protection for information that is “commercial or financial, or contains a trade secret or is privileged” or when “disclosure of the information could result in substantial competitive harm.”⁷

In the confidential version of its Data Response, GTL designated the following information as Confidential Information pursuant to the *Protective Order*: its costs of providing inmate calling services (“ICS”), revenue-producing minutes of use, costs associated with ancillary services and fees, and portions of its Description & Justification prepared by Economists, Inc. On September 9, 2014, outside counsel for Pay Tel requested access to the confidential version of GTL’s Data Response for two attorneys with the law firm of Brooks Pierce, and for Don Wood, Pay Tel’s outside consultant. Pursuant to the process outlined in the *Protective Order*,⁸ GTL files this objection to providing the confidential version of its Data Response to Pay Tel’s attorneys. GTL has no objection to providing the confidential version of its Data Response to Mr. Wood, and will provide those documents to Mr. Wood in accordance with the procedures set forth in the *Protective Order*.⁹

⁵ 5 U.S.C. § 552(b)(4).

⁶ 47 C.F.R. § 0.457(d).

⁷ 47 C.F.R. §§ 0.459(b)(3), 0.459(b)(5).

⁸ *Protective Order* ¶ 5.

⁹ *Protective Order* ¶¶ 5-6.

ARGUMENT

I. THE COMMISSION ROUTINELY PROTECTS THE TYPE OF DATA GTL HAS DESIGNATED AS CONFIDENTIAL INFORMATION

It is well-established that the requirements of FOIA and Commission policy afford confidentiality to information that could cause competitive harm when publicly disclosed.¹⁰ The language of FOIA itself demonstrates that Congress did not intend to allow the disclosure of confidential “trade secrets and commercial or financial information” obtained from private parties.¹¹ This exemption, known as FOIA Exemption 4, is reflected in the Commission’s rules, and states “[t]rade secrets and commercial or financial information obtained from any person and privileged or confidential” are “categories of materials not routinely available for public inspection.”¹² The Commission therefore “need not disclose information that is ‘trade secrets and commercial or financial information obtained from a person and privileged or confidential.’”¹³

There is no question that the confidential information included with GTL’s Data Response qualifies as “trade secrets and commercial or financial information.” Under FOIA, the terms “commercial” and “financial” are given “their ordinary meanings.”¹⁴ The test as to whether information is “confidential” depends on “whether the information was voluntarily or

¹⁰ See, e.g., *Nat’l Parks & Conservation Ass’n v. Morton*, 498 F.2d 765, 770 (D.C. Cir. 1974) (considering under FOIA whether disclosure would “cause substantial harm to the competitive position of the person from whom the information was obtained”); *Request for Confidential Treatment of Nexus Communications, Inc. Filing of FCC Form*, 28 FCC Rcd 5535, ¶ 5 (2013) (“To determine whether this information should be kept confidential, we must determine whether the preponderance of the evidence shows that disclosure of the information will cause Nexus substantial competitive harm.”); 47 C.F.R. § 0.459(a)(5) (looking at how “disclosure of the information could result in substantial competitive harm”).

¹¹ 5 U.S.C. § 552(b)(4).

¹² 47 C.F.R. § 0.457(d).

¹³ *Bartholdi Cable Co. v. FCC*, 114 F.3d 274, 281 (D.C. Cir. 1997) (citing 5 U.S.C. § 552(b)(4)).

¹⁴ *Allnet Commc’ns Servs, Inc. v. FCC*, 800 F. Supp. 984, 988 (D.D.C. 1992).

involuntarily disclosed to the government.”¹⁵ If “the information was obtained under compulsion,” as GTL’s Data Response was, it will be considered confidential “if disclosure. . . is likely to have either of the following effects: (1) to impair the Government’s ability to obtain necessary information in the future; or (2) to cause substantial harm to the competitive position of the person from whom the information was obtained.”¹⁶

As the Commission has recognized, the process of awarding ICS contracts is based on competitive bidding.¹⁷ Disclosure of GTL’s confidential Data Response to its competitor would cause substantial and irreparable harm to GTL. The Commission previously has found financial information and corporate operating expenses should be withheld from disclosure “because this material is competitively sensitive and therefore confidential” under FOIA.¹⁸ Similarly, the Commission consistently has held “revenue information to be the type of competitively sensitive material that should be withheld under” FOIA.¹⁹ Information concerning “business operations and plans” also has been withheld because disclosure could damage a company’s “competitive position by giving the competitors insight into [the company]’s business methods and

¹⁵ *Bartholdi Cable*, 114 F.3d at 281.

¹⁶ *Bartholdi Cable*, 114 F.3d at 281 (quoting *Nat’l Parks & Conservation Ass’n v. Morton*, 498 F.2d 765, 770 (D.C. Cir. 1974)).

¹⁷ *Inmate Calling Report and Order and FNPRM* ¶ 40.

¹⁸ *Sandwich Isles Communications, Inc. on Request for Inspection of Records*, 28 FCC Rcd 15253, ¶ 7 (2013).

¹⁹ *The Consumer Law Group*, 28 FCC Rcd 684, ¶ 6 (2013); see also *The Lakin Law Firm, P.C.*, 19 FCC Rcd 12727 ¶ 6 (2004); FOIA Control No. 2002-268, Letter from Joseph T. Hall to Fred B. Campbell, Harris Wiltshire & Grannis (July 8, 2002); FOIA Control No. 2002-351, Letter from Joseph T. Hall to Roy Thompson, Black Radio Network (Aug. 19, 2002); *John E. Wall, Jr.*, 22 FCC Rcd 2561 (2007).

strategies.”²⁰ Disclosure also “would help rivals to identify and exploit [GTL’s] competitive weaknesses.”²¹

The cost support data of the kind found in GTL’s Data Response, including “disaggregated cost data” that “have the potential of revealing [a company]’s market plans and positions” or “provide insight into [a company]’s business strategies,” also has been deemed exempt from mandatory public disclosure.²² Access to GTL’s confidential cost data, “when combined with other publicly available information, would enable competitors to estimate [GTL’s] revenues for specific product families, particular companies, and geographic areas, giving competitors a substantial competitive advantage.”²³ The Commission consistently has afforded “disaggregated customer data, detailed financial data or current or forward-looking business strategies or plans” a higher level of confidentiality than other information,²⁴ even when a protective order is in place.²⁵ Accordingly, the information designated by GTL as confidential in its Data Response is the type of material routinely protected from disclosure under FOIA and the Commission’s rules.

²⁰ *Josh Wein, Warren Communications News on Request for Inspection of Records*, 24 FCC Rcd 12347, ¶ 13 (2009).

²¹ *Baker & Hostetler LLP v. U.S. Dep’t of Commerce*, 473 F.3d 312, 320 (D.C. Cir. 2006) (citing *Critical Mass Energy Project v. Nuclear Regulatory Comm’n*, 830 F.2d 278, 281 (D.C. Cir. 1987) and *Pub. Citizen Health Research Group*, 704 F.2d 1280, 1290 (D.C. Cir. 1983)).

²² *Local Exchange Carriers’ Rates, Terms, and Conditions for Expanded Interconnection through Virtual Collocation for Special Access and Switched Transport*, 13 FCC Rcd 13354, ¶ 9 (1998); see also *Jonathan E. Canis, Frank W. Krogh, Richard J. Metzger*, 9 FCC Rcd 6495 (1994).

²³ *Wall* ¶ 3 (citing *Lakin* ¶ 6).

²⁴ *Pantelis Michalopoulos, Esquire, Christopher Bjornson, Esquire*, 25 FCC Rcd 7479, 2 (2010).

²⁵ *Randy H. Herschaft, Associated Press on Requests for Inspection of Records*, 22 FCC Rcd 5880, ¶ 24 (2007).

II. PAY TEL'S COUNSEL HAS NOT DEMONSTRATED A NEED FOR GTL'S CONFIDENTIAL DATA

A party trying to force disclosure of sensitive trade secrets or commercial or financial information is required to make a “persuasive showing as to the reasons for inspection.”²⁶ In reviewing FOIA requests, the Commission has clarified that a persuasive showing may not be a speculative claim, but should be a “necessary link in a chain of evidence” that will resolve a public interest issue.²⁷ No such persuasive showing can be made here, as allowing Pay Tel’s attorneys to access GTL’s confidential information would serve no useful purpose. GTL’s cost data has no bearing on the costs of its competitors. Each ICS provider must determine its costs based on the types of services it offers, the number of ICS contracts it supports, and numerous other unique factors.

Further, access to GTL’s confidential cost data is not required for Pay Tel to participate in this proceeding. Through the public version of GTL’s Data Response, Pay Tel has access to the methodology used by Economists, Inc. as well as GTL’s overall cost per minute to provide inmate calling services. Pay Tel has all the information it needs without accessing GTL’s confidential and proprietary data to the extent it wants to comment on GTL’s Data Response or make proposals in this proceeding based on GTL’s Data Response. The release of GTL’s “raw” data is not necessary “to achieve meaningful public comment.”²⁸

²⁶ 47 C.F.R. § 0.457(d)(1), (2); *see also* 47 C.F.R. § 0.461(c) (requiring requesters under FOIA to provide “the reasons for inspection and the facts in support thereof” when the documents being requested are the kinds routinely withheld from public inspection or that have been otherwise withheld from public inspection pursuant to a confidentiality request).

²⁷ *Examination of Current Policy Concerning the Treatment of Confidential Information Submitted to the Commission*, 13 FCC Rcd 24816, ¶ 8 (1998) (quoting *Classical Radio for Connecticut, Inc.*, 69 FCC 2d. 1517, 1520 n.4 (1978)); *Cincinnati Bell Telephone Company Tariff F.C.C. No. 45*, 10 FCC Rcd 10574, 10575 (1995) (denying FOIA Request No. 95-223).

²⁸ *Qwest Commc'ns Int'l Inc. v. FCC*, 229 F.3d 1172, 1184 (D.C. Cir. 2000).

Finally, it makes no difference that it is Pay Tel's outside counsel that is seeking access to the confidential information rather than internal Pay Tel personnel. As the Commission has found before, "the issue here is whether disclosure to the general public would result in competitive harm."²⁹ Any argument that the *Protective Order* "adequately protects [GTL] against competitive injury misses the mark"³⁰ as it is evident from Brooks Pierce's long-standing and exclusive representation of Pay Tel that it plays an important role in the company's Competitive Decision-Making process.³¹

III. GTL'S DATA DESIGNATED AS CONFIDENTIAL SHOULD BE WITHHELD FROM THOSE INVOLVED IN COMPETITIVE DECISION-MAKING

Under the Commission's rules, any person submitting information to the Commission may request that such information not be made routinely available for public inspection.³² Under the *Protective Order*, a party "designating documents and information as Confidential" pursuant to the *Protective Order* "will be deemed to have submitted a request that the material not be made routinely available for public inspection under the Commission's rules."³³ No such request, however, is necessary when the information is of the type specifically listed in 47 C.F.R. § 0.457 as exempt from disclosure.³⁴ As discussed above, trade secrets and commercial or financial information are exempt from disclosure as confidential under 47 C.F.R. § 0.457(d), and

²⁹ *Lakin* ¶ 7; see also *Nat'l Archives and Records Admin. v. Favish*, 541 U.S. 157 (2004) ("It must be remembered that once there is disclosure, the information belongs to the general public.").

³⁰ *Qwest Communications*, 229 F.3d at 1184.

³¹ See, e.g., Matt Evans, *Pay-Tel expands, looks for bigger industry footprint*, Triad Business Journal (Jan. 12, 2009), <http://www.bizjournals.com/triad/stories/2009/01/12/story1.html?page=all> (quoting Marcus Trathen from Brooks Pierce); WC Docket No. 96-128, Pay Tel Communications, Inc. Notice of Ex Parte Presentation (Oct. 17, 2008) (submitted by Marcus Trathen from Brooks Pierce); WC Docket No. 12-275, Pay Tel Communications, Inc. Notice of Ex Parte Presentation (July 26, 2013) (submitted by Marcus Trathen of Brooks Pierce).

³² 47 C.F.R. § 0.459(a)(1).

³³ *Protective Order* ¶ 3 (citing 47 C.F.R. §§ 0.459(a), 0.459(a)(3)).

³⁴ 47 C.F.R. § 0.459(a)(1).

no specific request for confidential treatment is necessary.³⁵ Nonetheless, the data designated as confidential in GTL's Data Response meets the criteria established in § 0.459(b) for withholding the information from public inspection:

(1) Identification of the specific information for which confidential treatment is sought.

GTL sought confidential treatment for its costs of providing ICS, its revenue-producing minutes of use, its costs associated with ancillary services and fees, and certain portions of its Description & Justification prepared by Economists, Inc., including a summary of its ICS costs, the percent of minutes of use associated with debit calling, and the amount of costs allocated to debit calls.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission.

GTL filed its confidential Data Response in accordance with the Commission's one-time mandatory data collection adopted in the *Inmate Calling Report and Order and FNPRM* and as required by the Commission's Instructions for Inmate Calling Services Mandatory Data Collection.

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.

The information identified in (1) is company-specific proprietary financial and commercial information that is not routinely disclosed by GTL. The confidential data contained in the GTL's Data Response is highly sensitive and can be manipulated by competitors to gain an unfair advantage over GTL in the marketplace. As discussed above, the Commission has recognized the sensitivity of this trade secret, commercial or financial data and routinely protects its confidentiality.

³⁵ 47 C.F.R. § 0.457(d).

(4) Explanation of the degree to which the information concerns a service that is subject to competition.

The data for which confidential treatment has been sought involves the provision of inmate calling services. The inmate calling market is subject to competition from a multitude of inmate telephone providers. Competition for inmate service contracts is robust, and service providers compete with respect to rates.

(5) Explanation of how disclosure of the information could result in substantial competitive harm.

As explained above, the information in GTL's Data Response could easily be used by competitors to cause substantial harm to GTL. The data could be used to monitor GTL's inmate calling products and to devise competitive marketing strategies. The historical data can be manipulated by competitors to determine the effectiveness of GTL's ongoing business plans. The projected data can be manipulated by competitors to gain insight into the future business plans and strategies of GTL.

(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure.

The data for which GTL sought confidential treatment as identified in (1) above are not routinely disclosed to the public.

(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.

The data for which GTL sought confidential treatment as identified in (1) above have not been disclosed to any competitor of GTL.

(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure.

GTL asserts the confidential data identified in (1) above should be withheld from public disclosure permanently consistent with the Commission's determination that release of such types of information would "give[] competitors a substantial competitive advantage."³⁶

CONCLUSION

Accordingly, and for the foregoing reasons, GTL respectfully requests that the Commission limit access to the confidential version of GTL's Data Response and not permit outside counsel for one of GTL's competitors to obtain access to the data.

Respectfully submitted,

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Dated: September 12, 2014

Its Attorneys

³⁶ *Lakin* ¶ 6.

CERTIFICATE OF SERVICE

I hereby certify that, on this 12th day of September, 2014, I served a copy of the foregoing Global Tel*Link Corporation Objection to Disclosure of Confidential Information on the following via the method indicated:

Marlene H. Dortch
Secretary
Federal Communications Commission
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Washington, DC 20554
Via ECFS

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/s/ Angela Fleming

Collins Declaration

Exhibit 11

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* ADMITTED IN DC ONLY

October 6, 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 Objection to Disclosure of Confidential
Information**

Dear Secretary Dortch:

Global Tel*Link Corporation (“GTL”),¹ by its attorneys, hereby objects to the request of counsel for Pay Tel Communications, Inc. (“Pay Tel”) to obtain the confidential version of GTL’s supplemental response to the Commission’s one-time mandatory data collection (hereinafter “Supplemental Response”), which was filed September 29, 2014 in the above-referenced docket.²

¹ This Objection 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.

² *Rates for Interstate Inmate Calling Services*, 28 FCC Rcd 14107 (2013) (“*Inmate Calling Report and Order and FNPRM*”), *pets. for stay granted in part sub nom. Securus Tech., Inc. v. FCC*, No. 13-1280 (D.C. Cir.

On August 22, 2014, GTL filed its response to the Commission's one-time mandatory data collection (hereinafter "Initial Response"). On September 9, 2014, outside counsel for Pay Tel requested access to the confidential version of GTL's Initial Response for two attorneys with the law firm of Brooks Pierce, and for Don Wood, Pay Tel's outside consultant. Pursuant to the process outlined in the *Protective Order*,³ on September 12, 2014, GTL objected to disclosing the confidential version of its Initial Response to Pay Tel's attorneys, but agreed to provide the information to Mr. Wood. GTL provided Mr. Wood with the confidential version of its Initial Response on September 17, 2014.

On September 29, 2014, GTL filed its Supplemental Response to the Commission's one-time mandatory data collection. On October 1, 2014, attorneys for Pay Tel requested a copy of the confidential version of GTL's Supplemental Response for themselves and Mr. Wood. GTL provided a copy of its confidential Supplemental Response to Mr. Wood on October 1, 2014, but informed Pay Tel's attorneys that it continues to object to providing confidential information to its competitors. GTL hereby files this letter to notify the Commission of its continued objection to the disclosure of its confidential information to Pay Tel's attorneys, and GTL incorporates by reference its Objection to Disclosure of Confidential Information ("Initial Objection") filed on September 12, 2014.

The confidential information included with GTL's Supplemental Response qualifies as "trade secrets and commercial or financial information" under the Commission's rules and the requirements of the Freedom of Information Act ("FOIA").⁴ GTL understands that the *Protective Order* protects the disclosure of GTL's information to the general public. GTL, however, has significant concerns about the disclosure of its confidential information to outside counsel for its competitors even under the safeguards afforded by the *Protective Order*.⁵ As the Commission previously has found, "disaggregated cost data" has "the potential of revealing [a company]'s market plans and positions" and can "provide insight into [a company]'s business strategies."⁶ Access to GTL's confidential cost data, "when combined with other publicly available information, would enable competitors to estimate [GTL's] revenues for specific

Jan.13, 2014) ("*Partial Stay Order*"), *pets. for review pending sub nom. Securus Tech., Inc. v. FCC*, No. 13-1280 (D.C. Cir. filed Nov. 14, 2013) (and consolidated cases).

³ *Rates for Interstate Inmate Calling Services*, 28 FCC Rcd 16954, ¶ 2 (2013) ("*Protective Order*").

⁴ 47 C.F.R. § 0.457(d); 5 U.S.C. § 552(b)(4).

⁵ *Qwest Commc'ns Int'l Inc. v. FCC*, 229 F.3d 1172, 1184 (D.C. Cir. 2000) ("A response that the protective order adequately protects Qwest against competitive injury misses the mark. The Commission must explain why only the release of raw audit data will achieve meaningful public comment.").

⁶ *Local Exchange Carriers' Rates, Terms, and Conditions for Expanded Interconnection through Virtual Collocation for Special Access and Switched Transport*, 13 FCC Rcd 13354, ¶ 9 (1998); see also *Jonathan E. Canis, Frank W. Krogh, Richard J. Metzger*, 9 FCC Rcd 6495 (1994).

product families, particular companies, and geographic areas, giving competitors a substantial competitive advantage.”⁷

Pay Tel’s attorneys assert they are not involved in “competitive decision-making” on behalf of Pay Tel, but then claim they must be able to “utilize” GTL’s confidential information to “advocate” for Pay Tel’s interests in this proceeding.⁸ Pay Tel’s attorneys cannot have it both ways. Pay Tel’s position in this proceeding should not be based on an “evaluation” of GTL’s confidential cost data, but that is precisely why Pay Tel’s attorneys claim they need access to GTL’s information.⁹ Pay Tel’s attorneys all but acknowledge that they will use GTL’s confidential information to provide “advice about . . . relevant business decisions” of Pay Tel in this proceeding, which is the type of competitive decision-making prohibited under the *Protective Order*.¹⁰

Pay Tel’s attorneys also claim they must have access to GTL’s confidential information to respond to and “evaluate the Joint Proposal against the cost data submitted to the Commission.”¹¹ Access to GTL’s confidential cost data is not required for Pay Tel to participate in this proceeding or to evaluate the Joint Proposal. The Joint Proposal is not “based on the data submitted” by GTL, and is certainly not based on the confidential information GTL seeks to protect from its competitors. Indeed, the public version of GTL’s Initial Response contains GTL’s overall cost per minute to provide inmate calling services, as well as the methodology used by Economists Inc. To the extent Pay Tel takes issue with the Joint Proposal’s “uniform price cap,” it has the information it needs to advocate for something different. In fact, Pay Tel’s recent 16-page response to the Joint Proposal¹² demonstrates that it does not need access to GTL’s confidential information to participate in this proceeding or evaluate the Joint Proposal.¹³

For the foregoing reasons and those set forth in GTL’s September 12 Objection to Disclosure of Confidential Information, GTL respectfully requests that the Commission limit access to the confidential version of GTL’s Initial Response and the confidential version of its

⁷ *John E. Wall, Jr.*, 22 FCC Rcd 2561, ¶ 3 (2007) (citing *The Lakin Law Firm, P.C.*, 19 FCC Rcd 12727, ¶ 6 (2004)).

⁸ WC Docket No. 12-375, Pay Tel Communications, Inc. Response to Global Tel*Link Corporation’s Objection to Disclosure of Confidential Information, 2, 10 (filed Sept. 24, 2014) (“Pay Tel Response”).

⁹ Pay Tel Response at 2.

¹⁰ *Protective Order* at 1 (defining “Competitive Decision-Making”).

¹¹ Pay Tel Response at 2 (citing to the Joint Proposal filed by GTL and other ICS providers on September 15, 2014).

¹² WC Docket No. 12-375, Letter from Marcus W. Trathen, Counsel for Pay Tel Communications, Inc., to Marlene H. Dortch, Secretary (Oct. 2, 2014).

¹³ *Qwest Commc’ns Int’l Inc. v. FCC*, 229 F.3d 1172, 1184 (D.C. Cir. 2000) (“A response that the protective order adequately protects Qwest against competitive injury misses the mark. The Commission must explain why only the release of raw audit data will achieve meaningful public comment.”).

Marlene H. Dortch
October 6, 2014

Supplemental Response, and not permit outside counsel for one of GTL's competitors to obtain access to the confidential data.

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

Respectfully submitted,

/s/ Chérie R. Kiser

Chérie R. Kiser
Angela F. Collins

Counsel for Global Tel*Link Corporation

cc (via e-mail): Marcus Trathen, Counsel for Pay Tel
Timothy Nelson, Counsel for Pay Tel