

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

Rates for Interstate Inmate Calling Services

WC Docket No. 12-375

**SECURUS TECHNOLOGIES, INC. REPLY TO WRIGHT PETITIONERS'
OPPOSITION TO MOTION FOR LEAVE TO FILE REPLY**

Securus Technologies, Inc. (“Securus”), through counsel and pursuant to 47 C.F.R. §§ 1.3 and 1.43, replies briefly to the Opposition to Motion for Leave to File Reply filed January 6, 2016, by the Wright Petitioners (“Opp. to Mot. for Leave”).

First, Securus supplied a form of its Reply in support of its Petition for Partial Stay (filed Dec. 22, 2015) in order to demonstrate that, were leave granted, the Reply would be filed timely and would conform to the four-page limit that Securus promised; it was provided in the service of administrative convenience and efficiency.

Secondly, Securus is fully aware that the form of Reply will not be, absent leave, part of the record for the Commission’s consideration of the Petition for Partial Stay.

Third, it is common practice, if not a requirement, in many forums, including many U.S. District Courts, to supply a form of the pleading sought to be filed.

Fourth, no party could be harmed by the grant of Securus’s Motion, and the Wright Petitioners do not attempt to claim otherwise. Denying the Motion would, by contrast, cause the record to be unclear and incorrect which is a harm that should be prevented.

Fifth, only one Securus letter was excluded from the record in this docket.

Finally, the Wright Petitioners assert that Securus failed “to provide any legal support for its claim that the Motion should be granted,” Opp. to Mot. for Leave at 2, and yet expressly

“[I]eav[e] aside the merits of Securus’ arguments,” *id.* at 1. Securus’s arguments included that the Wright Petitioners made an unfounded accusation that Securus presented “misleading” evidence, Wright Petitioners’ Opposition to Petition for Partial Stay at 4 (filed Dec. 29, 2015), which accusation was plainly false and warranted response. Motion for Leave at 1. The Wright Petitioners also “misapprehend the scope of the Securus Petition and appear to misunderstand its legal basis.” *Id.* They ignore these issues entirely, and thus in fact have no substantive opposition to Securus’s Motion at all.

CONCLUSION

For these reasons, the Commission should grant the Motion for Leave to File Reply and permit Securus to file a Reply to the Wright Petitioners in substantially the form attached to that Motion.

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Dated: January 7, 2016

CERTIFICATE OF SERVICE

I hereby certify on this 7th day of January, 2016, that the foregoing Reply to Wright Petitioners' Opposition to Motion for Leave to File Reply was served via electronic mail on the following persons:

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