PATTON BOGGS LLP

2550 M Street, NW
Washington, DC 20037-1350
202-457-6000

Facsimile 202-457-6315
www.pattonboggs.com

March 20, 2013

Paul C. Besozzi
202-457-5292
pbesozzi@pattonboggs.com

FILED VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: Joint Applications for Streamlined Consent for Domestic and International Transfers of Control; Securus Technologies, Inc.; T-NETIX, Inc.; T-NETIX Telecommunications Services, Inc. – WC Docket No. 13-79; ITC-T/C-INTR2013-00597; ITC-T/C-INTR2013-00598

Dear Ms. Dortch:

The above applications for transfer of control of international and domestic Section 214 authority held by Securus Technologies, Inc. ("STI"), T-NETIX, Inc. ("T-NETIX"), and T-NETIX Telecommunications Services, Inc. ("T-NETIX Telecom") were filed on March 15, and March 18, 2013, respectively ("Applications").[1] One of the exhibits attached to the Applications was a "Post-Closing Holding Structure" diagram which showed the post-transaction corporate structure of the parties involved in the transactions described in the Applications. That diagram showed the owners of Securus Special Investments, LLC ("SSI"), the sixth or seventh level ultimate owner of STI, T-NETIX, T-NETIX Telecom, and the percentage ownership for each of those owners.

There has been a slight revision to those ownership percentages and the addition of an investor that will acquire a non-controlling interest in SSI of less than ten (10) percent, which are reflected in the revised Post-Closing Holding Structure diagram attached hereto. It is respectfully requested that this diagram be substituted for the diagram initially submitted with the Applications.

Paragraph 5 of both the Securus and T-NETIX applications and paragraph 4 of the T-NETIX Telecom application states that SSI will hold a 95.3% interest in Securus Investment Holdings, LLC

[1] Joint Applications for Streamlined Consent for Domestic and International Transfer of Control were filed electronically for STI and T-NETIX with the International Bureau on March 15, 2013 and again in paper with the Wireline Bureau on March 18, 2013. An Application for Streamlined Consent to Domestic Transfer of Control for T-NETIX Telecom was filed in paper with the Wireline Bureau on March 18, 2013. T-NETIX Telecom does not hold an international Section 214 authorization. *See* WC Docket No. 13-79; ITC-T/C-INTR2013-00597; ITC-T/C-INTR2013-00598.

("SIH"). Consistent with the revised Post-Closing Holding Structure diagram attached hereto, this interest should be 96.4%.

In addition, pages 9 and 10 of both the Securus and T-NETIX applications and pages 8 and 9 of the T-NETIX Telecom application states that: (1) SSI will hold a 95.3% interest in SIH; (2) ABRY Partners VII, L.P. will hold a 66.88% interest in SSI; (3) HarbourVest Partners 2012 Direct Fund L.P. will hold a 15.43% interest in SSI; and (4) Redoak Investments LLC will hold a 15.43% interest in SSI.

Consistent with the revised Post-Closing Holding Structure diagram attached hereto: (1) SSI will hold a 96.4% interest in SIH; (2) ABRY Partners VII, L.P. will hold a 64.44% interest in SSI; (3) HarbourVest Partners 2012 Direct Fund L.P. will hold a 11.92% interest in SSI; and (4) Redoak Investments LLC will hold a 11.92% interest in SSI. No other individuals or entities will hold a ten (10) percent or greater interest in SIH.

The nature of the authorization sought in the Applications, approval of the indirect acquisition of the capital stock, and the transfer of control of, STI, T-NETIX, and T-NETIX Telecom, remains unchanged, and unaffected by this minor (and inconsequential) change in ultimate ownership percentages.

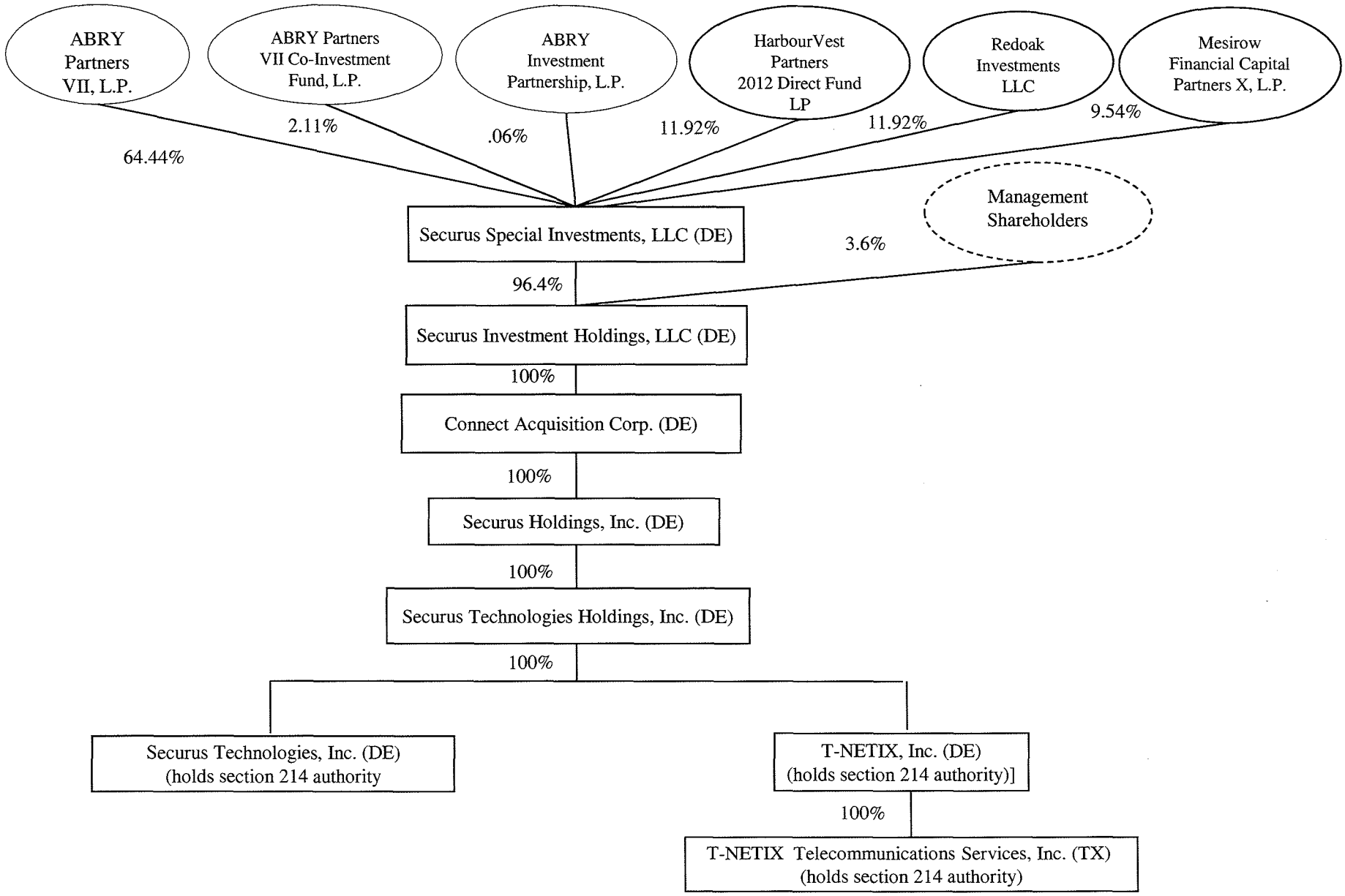
As requested in the applications, it is respectfully requested that the Commission approve the transactions described in the Applications at its first opportunity.

Sincerely,

Paul Besozzi

Paul Besozzi

Attachment

cc: Bennett L. Ross, Esq.

Post-Closing Holding Structure