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April 26, 2013

BY EMAIL

Julie Veach
Chief, Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Domestic 214 Applications Filed for the Indirect Transfer of Control of the Operating Subsidiaries of Connect Acquisition Corp. to Securus Investment Holdings, LLC*, WC Docket No. 13-79

Dear Ms. Veach:

Millicorp, d/b/a ConsCallHome, through its counsel, hereby withdraws its opposition to the above-referenced applications filed by Securus Technologies, Inc.; Connect Acquisition Corp.; T-NETIX, Inc.; and T-NETIX Telecommunications Services, Inc. (collectively "Securus") and Securus Investment Holdings, LLC (collectively "Applicants"), to transfer control of the operating subsidiaries of Connect Acquisition Corp. to Securus Investment Holdings, LLC ("Transfer of Control Application"). Millicorp also does not object to Applicants' related international transfer of control application. Millicorp's withdrawal of its opposition to the Transfer of Control Application is predicated on the filing today by Applicants of the appended letter in the above-referenced proceeding.

Please contact the undersigned with any questions or concerns regarding this letter.

Sincerely,

Phillip R. Marchesiello
Counsel to Millicorp

Attachment

cc: Tim Meade, President, Millicorp
Dennis Reinhold, V.P. General Counsel and Secretary, Securus

SECURUS™ TECHNOLOGIES

14651 Dallas Parkway, 6th Floor
Dallas, TX 75254-8815
www.SecurusTech.Net

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Re: *Domestic 214 Applications Filed for the Indirect Transfer of Control of the Operating Subsidiaries of Connect Acquisition Corp. to Securus Investment Holdings, LLC*, WC Docket No. 13-79

Dear Ms. Veach:

Applicants Securus Technologies Inc., Connect Acquisition Corp., T-NETIX, Inc., and T-NETIX Telecommunications Services, Inc. (collectively "Securus") and Securus Investment Holdings, LLC (collectively "Applicants"), hereby undertake the following commitments and clarifications of the record in response to concerns raised by Millicorp, d/b/a ConsCallHome, in the above-referenced Docket. These commitments and clarifications will advance the public interest by facilitating the objective of the Federal Communications Commission ("Commission") to foster increased communications between inmates and their friends and families. These commitments and clarifications are in addition to, and not in lieu of, representations made in the above-referenced applications ("Transfer of Control Application") and in Applicants' filings in this proceeding. The commitments and clarifications shall be effective as of the date that control of the operating subsidiaries of Connect Acquisition Corp. is transferred to Securus Investment Holdings, LLC.

Millicorp has agreed to continue to populate the Line Information Data Base ("LIDB") for each telephone number that Millicorp assigns to its customers ("Millicorp Numbers") with sufficient information so that Securus can determine the terminating name and service street address of the called party. Accordingly, Applicants, and any commonly controlled affiliates of Applicants, commit to cease and desist any and all blocking of inmate-initiated calls to Millicorp Numbers except to the extent permitted under the procedures set forth in the Attachment. Applicants will comply with the procedures set forth in the Attachment and will cooperate and collaborate in good faith with Millicorp to effectuate the intent of the Attachment. Applicants believe that these procedures strike a reasonable balance between satisfying the security concerns expressed by Securus in WC Docket No. 09-144 and ensuring that inmate-initiated call recipients may benefit from access to Millicorp's services.

The commitments set forth in the Attachment shall not be read or applied to limit or contravene any obligations imposed on Applicants by virtue of contractual arrangements with state or local correctional authorities or the inmate calling procedures of such authorities. The Applicants understand and acknowledge that they may not interpret provisions in such

contractual arrangements or inmate calling procedures, including provisions regarding the treatment of call forwarding or call diversion services or schemes, to apply to Millicorp's services as currently configured. Moreover, Applicants will not in any way solicit or induce, directly or indirectly, their current or potential future state and local correctional and other customers to modify or amend their contractual arrangements or inmate calling procedures in any manner that would prohibit, or allow the blocking of, calls to Millicorp Numbers or suggest such modifications or amendments.

Applicants agree not to discriminate against Millicorp or its customers with respect to the completion of inmate-initiated calls to Millicorp Numbers, nor to treat such calls differently from inmate-initiated calls made to the customers of any other landline or VoIP providers, including, but not limited to, (i) by requiring Millicorp's customers to comply with any administrative requirements, such as furnishing phone statements or providing any additional information, not required of other users of landline or VoIP providers, or (ii) by charging inmates rates to call Millicorp Numbers that are not consistent with the rates that Applicants charge the customers of other providers. Applicants will charge inmates local rates to complete calls to Millicorp Numbers that are local to the confinement facilities from which inmate calls are placed such that an inmate in a particular facility calling a Millicorp Number with a particular NPA-NXX will be charged the same rate that SECURUS charges all inmates incarcerated at such facility for making calls to telephone numbers with the same NPA-NXX.

The Applicants understand that, upon the filing of this letter in the above-referenced proceeding and the execution of a related agreement, Millicorp shall notify the Commission that it has no objection to the Commission's grant of the Applicants' Transfer of Control Application and related international transfer of control application. Applicants have no objection to the Commission's inclusion of these commitments in any grant of the Transfer of Control Application.

Please contact the undersigned with any questions or concerns regarding this letter. Thank you.

Sincerely,

D.J. Reinhold

Dennis J. Reinhold

Vice President, General Counsel and Secretary

Attachment

cc: Tim Meade, President, Millicorp
Phil Marchesiello, Counsel to Millicorp

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ATTACHMENT

LIDB Verification Procedure. Securus will not block an inmate-initiated call to any telephone number assigned by Millicorp to any of its customers ("Millicorp Number") unless (1) Securus has first queried a major industry-standard Line Information Data Base ("LIDB") (*i.e.*, a LIDB that interconnects daily with the top five largest LIDBs) and determined that either the OCN, name, or address fields for the Millicorp Number are not populated in such LIDB or are clearly inaccurate and (2) if these LIDB fields are not populated or are clearly inaccurate, then Securus has queried a database ("Millicorp-Securus Database") that it internally maintains that contains the telephone numbers, names, and addresses of all of Millicorp's customers and determines that the Millicorp Number is not present in the Millicorp-Securus Database; or (3) the Millicorp Number is not allowed to be called by the inmate or is required to be blocked pursuant to a customer contract between Securus and its confinement facility client or the facility's inmate calling procedures (collectively "Confinement Facility Policies"). (For example, (i) no calls from inmates incarcerated by the Florida Department of Corrections or the Texas Department of Criminal Justice may be terminated to prepaid cell phones; (ii) most confinement facilities do not permit inmate-initiated calls to witnesses, victims, judges, businesses, etc.; (iii) certain facilities only allow inmate-initiated calls to "allowed lists" of call recipients.) Securus will block an inmate-initiated call to a Millicorp Number <u>only</u> if Securus is unable to determine the OCN, name, and address of the customer assigned such Millicorp Number after complying with both of the foregoing steps (1) and (2), or an applicable Confinement Facility Policy does not allow the termination of an inmate-initiated call to the Millicorp Number or requires such call to be blocked as set forth in (3) above.

Millicorp-Securus Database. Securus and Millicorp will establish an operational Millicorp-Securus Database within 30 days. The Millicorp-Securus Database will be automatically updated by Millicorp (no more often than hourly but no less often than daily) in a mutually agreeable reasonable manner. During the foregoing 30-day interim period, (1) Securus will consult Millicorp in a mutually agreeable reasonable manner to confirm the identity and address of any inmate call recipient whose calls from an inmate or inmates are blocked and who asserts to Securus that he or she is a Millicorp customer and (2) Securus will provide to Millicorp a contact person whom Millicorp can consult to resolve any such call blocking issues.

OCNs. To the extent reasonably feasible, Millicorp will populate the OCN field in LIDB for each Millicorp Number. Millicorp and Securus acknowledge that, to the extent that Millicorp is unable to populate the OCN field with respect to certain Millicorp Numbers, Securus will be unable to confirm through LIDB the identity and address of the customer to whom Millicorp assigns such Millicorp Number. Consequently, the parties will rely on the Millicorp-Securus Database to enable Securus to confirm the name and address of the Millicorp customer associated with such Millicorp Number. For purposes of this Attachment, the term "OCN" shall mean the OCN field of LIDB, as well as a bogus, pseudo, proxy or similar OCN field to which access is made available by a LIDB administrator to non-ILEC and non-CLEC holders of telephone numbers.

LIDB Verification Testing. Millicorp currently uploads customer information into the LIDB operated by Transaction Network Services ("TNS"). These uploads occur programmatically three times per day as new customers are input into Millicorp's customer relationship

management system. (TNS processes LIDB data three times each day except Sunday at the following Pacific times: 4:00am, 10:00am, 6:00pm. On Sunday, batches are only processed at 10:00am and 6:00pm.) The batch files uploaded by Millicorp to the TNS LIDB consist of the following fields:

NPA/NXX/Line#
OCN (including pseudo, bogus, proxy or similar OCNs)
First name
Last name
Street Address*
City
State
Zip Code

* Millicorp shall populate the "Street Address" field in LIDB with its customers' service street address.

Based on initial testing by Securus, Securus has made a preliminary determination that the method currently used by Millicorp to insert its customers' information into LIDB is sufficient to render such information accessible to Securus in a manner that is acceptable to Securus and that enables Securus to access the information in satisfaction of LIDB Verification Procedure step (1) above. Millicorp and Securus shall cooperate in good faith for a period of thirty days to enable Securus to continue and complete such testing. In addition, the parties will collaborate to accomplish any changes in (A) Millicorp's practices with respect to the population of LIDB with Millicorp's customer information and (B) Securus' practices with respect to querying such LIDB databases to obtain Millicorp's customer information as are reasonably necessary to successfully effectuate LIDB Verification Procedure step (1) above.