

Arent Fox

March 4, 2014

VIA ECFS

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

Stephanie A. Joyce

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Re: WC Docket No. 12-375, Supplement to Securus Petition to Expand Pay Tel Waiver

Dear Ms. Dortch:

On February 19, 2014, Securus Technologies, Inc. (“Securus”) filed a Petition to Expand Pay Tel Waiver with the Wireline Competition Bureau.

The waiver that Pay Tel was granted on February 11, 2014, was based largely on its revised presentation of a revenue “shortfall” totaling \$1,666,412. Petition at 2 (quoting Letter from Marcus Trathen, Counsel to Pay Tel, to FCC (Jan. 16, 2014)). As Securus has stated, it too will suffer a revenue shortfall under the Interim Rate Caps. *Id.* at 6-7. Securus is subject to the same intrastate caps as Pay Tel, and its costs of service are in many cases much higher than Pay Tel’s. *Id.* at 4 (providing Table 2 from Report of Stephen E. Siwek).

In order further to assist the Bureau in its consideration of the Petition, Securus provides evidence in the form of a sworn declaration regarding its own “revenue shortfall”. Geoffrey Boyd, Chief Financial Officer of Securus, states that Securus will incur, at city and county jails in the states for which Pay Tel obtained the waiver, a shortfall of “approximately **\$1.5 Million**” annually under the Interim Rate Caps as opposed to the \$0.46 per minute rate that Pay Tel may charge.

Please do not hesitate to contact me with any questions: 202.857.6081.

Sincerely,

s/Stephanie A. Joyce

Counsel to Securus Technologies, Inc.

Arent Fox

Cc: Deena Shetler, Associate Bureau Chief, Wireline Competition Bureau
Kalpak Gude, Chief, Pricing Policy Division
David Zesiger, Senior Counsel, Pricing Policy Division
Rhonda Lien
All via electronic mail