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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 DIRECT COSTS	TOTAL ICS COMMON COSTS									
							60,876,130		0	71,369,257	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
	0-99	248					Local	297,723		0	233,709	0
							State Intra-LATA	139,226		0	93,888	0
							State Inter-LATA	138,630		0	28,682	0
							Interstate	65,631		0	26,808	0
							International	13,978		0	8,620	0
	100-349	268					Local	1,232,463		0	1,784,730	0
							State Intra-LATA	696,156		0	447,278	0
							State Inter-LATA	689,708		0	245,579	0
							Interstate	326,626		0	1,107,836	0
							International	69,630		0	228,396	0
	350-999	258					Local	3,148,496		0	4,641,705	0
							State Intra-LATA	1,778,426		0	1,223,366	0
							State Inter-LATA	1,761,955		0	551,718	0
							Interstate	834,155		0	938,090	0
							International	177,622		0	140,894	0
	1000 & Over	561					Local	10,492,077		0	8,478,888	0
							State Intra-LATA	5,926,443		0	2,166,295	0
							State Inter-LATA	5,871,553		0	772,749	0
							Interstate	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					Local	160,031		0	932,348	0
							State Intra-LATA	90,393		0	733,396	0
							State Inter-LATA	89,656		0	6,192	0
							Interstate	42,398		0	220,425	0
							International	9,028		0	1,047	0
	5000 - 19,999	300					Local	2,750,928		0	7,340,105	0
							State Intra-LATA	1,553,860		0	2,561,777	0
							State Inter-LATA	1,539,468		0	4,618,838	0
							Interstate	728,825		0	1,590,915	0
							International	155,191		0	4,118,567	0
	20,000 & Over	638					Local	6,888,145		0	13,199,266	0
							State Intra-LATA	3,873,819		0	4,115,767	0
							State Inter-LATA	3,837,940		0	6,441,241	0
							Interstate	1,816,991		0	824,697	0
							International	386,905		0	24,081	0

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DEBIT CALLS

TOTAL ICS INFORMATION

2013											
Number of Facilities	Type	Telecom Costs			Security Costs	Other	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls
		Equip Costs	Other	Other							
174	DIRECT					241,423		0	228,515	0	
	COMMON					129,261		0	102,498	0	
244	DIRECT					132,180		0	23,787	0	
	COMMON					64,186		0	35,198	0	
245	DIRECT					13,888		0	16,861	0	
	COMMON					1,244,029		0	1,717,659	0	
550	DIRECT					666,185		0	447,041	0	
	COMMON					680,904		0	263,290	0	
						330,745		0	1,216,309	0	
						71,563		0	240,021	0	
						3,409,345		0	4,747,797	0	
						1,825,725		0	1,198,401	0	
						1,866,064		0	524,541	0	
						906,430		0	1,215,648	0	
						196,121		0	231,671	0	
						11,166,888		0	8,277,008	0	
						5,979,850		0	1,965,991	0	
						6,111,952		0	797,514	0	
						2,968,845		0	1,239,781	0	
						642,369		0	355,402	0	

2013											
Number of Facilities	Type	Telecom Costs			Security Costs	Other	Commissions Paid	Revenue Producing MOU	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls
		Equip Costs	Other	Other							
49	DIRECT					132,497		0	938,265	0	
	COMMON					70,953		0	764,158	0	
286	DIRECT					72,521		0	8,635	0	
	COMMON					35,226		0	201,065	0	
665	DIRECT					7,622		0	1,055	0	
	COMMON					2,748,261		0	4,791,588	0	
						1,471,723		0	2,471,889	0	
						1,504,240		0	2,033,514	0	
						740,676		0	788,275	0	
						189,096		0	12,116	0	
						7,927,977		0	18,082,940	0	
						4,245,480		0	4,454,233	0	
						4,339,282		0	7,103,680	0	
						2,107,781		0	1,048,850	0	
						456,060		0	30,694	0	

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DEBIT CALLS

TOTAL ICS INFORMATION

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

2014						
Number of Facilities	Telecom Costs	Equip Costs	Security Costs	Other	Jurisdiction	Commissions Paid
138	DIRECT				Local	205,944
					State Intra-LATA	110,996
					State Inter-LATA	119,203
	COMMON				Interstate	55,220
226	DIRECT				International	10,871
					Local	1,208,328
					State Intra-LATA	651,181
	COMMON				State Inter-LATA	699,326
229	DIRECT				Interstate	323,957
					International	63,777
					Local	3,128,001
	COMMON				State Intra-LATA	1,485,712
531	DIRECT				State Inter-LATA	1,810,346
					Interstate	838,627
					International	165,101
	COMMON				Local	10,761,641
645	DIRECT				State Intra-LATA	5,801,176
					State Inter-LATA	6,230,089
					Interstate	2,886,034
	COMMON				International	568,174

2014						
Number of Facilities	Telecom Costs	Equip Costs	Security Costs	Other	Jurisdiction	Commissions Paid
54	DIRECT				Local	284,718
					State Intra-LATA	153,437
					State Inter-LATA	164,782
	COMMON				Interstate	76,334
261	DIRECT				International	15,028
					Local	2,561,413
					State Intra-LATA	1,380,372
	COMMON				State Inter-LATA	1,482,430
645	DIRECT				Interstate	666,723
					International	135,195
					Local	7,928,550
	COMMON				State Intra-LATA	4,272,777
645	DIRECT				State Inter-LATA	4,586,687
					Interstate	2,125,669
					Local	19,093,162
	COMMON				State Intra-LATA	4,750,003
645	DIRECT				State Inter-LATA	1,428,084
					Interstate	1,428,084
					Local	12,420
	COMMON				State Intra-LATA	32,974

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PREPAID CALLS

TOTAL ICS INFORMATION

		2012									
All ICS OPERATIONS	Total Costs	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
	130,662,714								0	88,686,004	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
0-99		248	DIRECT				Local	566,506		0	585,436	0
			COMMON	361,654			State IntraLATA	361,654		0	375,374	0
100-349		268	DIRECT				State InterLATA	250,888		0	89,980	0
			COMMON	119,602			Interstate	119,602		0	57,339	0
			DIRECT	2,818,463			International	1,805		0	365	0
			COMMON	1,799,290			Local	2,818,463		0	2,538,567	0
350-999		258	DIRECT				State IntraLATA	1,248,212		0	1,077,214	0
			COMMON	8,979			State InterLATA	1,248,212		0	463,701	0
			DIRECT	7,200,153			Interstate	595,040		0	213,610	0
			COMMON	4,596,534			International	8,979		0	4,048	0
1000 & Over		561	DIRECT				Local	7,200,153		0	7,709,110	0
			COMMON	3,188,730			State IntraLATA	4,596,534		0	2,090,901	0
			DIRECT	22,938			State InterLATA	3,188,730		0	721,742	0
			COMMON	23,993,853			Interstate	1,520,112		0	685,285	0
20,000 & Over		638	DIRECT				International	22,938		0	4,595	0
			COMMON	15,317,531			Local	23,993,853		0	27,502,936	0
			DIRECT	10,626,151			State IntraLATA	15,317,531		0	7,624,603	0
			COMMON	5,065,635			State InterLATA	10,626,151		0	1,525,764	0
									0	1,510,693	0	
									0	9,885	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	365,967		0	448,609	0
			COMMON	233,651			State IntraLATA	365,967		0	211,476	0
5000-19,999		300	DIRECT				State InterLATA	162,076		0	3,656	0
			COMMON	77,264			Interstate	77,264		0	63,902	0
			DIRECT	6,290,973			International	1,166		0	186	0
			COMMON	4,016,119			Local	6,290,973		0	2,123,013	0
20,000 & Over		638	DIRECT				State IntraLATA	2,786,081		0	3,626,193	0
			COMMON	1,328,164			State InterLATA	2,786,081		0	1,749,707	0
			DIRECT	15,683,579			Interstate	1,328,164		0	2,302,119	0
			COMMON	10,072,302			International	20,041		0	1,832	0
									0	5,567,203	0	
									0	5,021,385	0	
									0	11,086,993	0	
									0	1,675,230	0	
									0	10,352	0	

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TOTAL ICS INFORMATION

2013									
	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 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	Non-Revenue Producing MOU	Number of Revenue Producing Calls	Number of Non-Revenue Producing Calls
174	DIRECT				Local	547,361		0	679,108	0
					State Intra-LATA	343,071		0	428,651	0
	COMMON				State Inter-LATA	311,864		0	93,569	0
244	DIRECT				Interstate	1,301,119		0	90,715	0
					International	1,140		0	665	0
	COMMON				Local	2,820,497		0	2,608,975	0
245	DIRECT				State Intra-LATA	1,767,811		0	1,346,511	0
					State Inter-LATA	1,607,002		0	496,542	0
	COMMON				Interstate	6,701,489		0	203,613	0
550	DIRECT				International	5,874		0	3,334	0
					Local	7,729,760		0	7,877,485	0
	COMMON				State Intra-LATA	4,844,805		0	1,910,147	0
286	DIRECT				State Inter-LATA	4,404,096		0	729,297	0
					Interstate	1,837,519		0	743,329	0
	COMMON				International	16,099		0	4,043	0
665	DIRECT				Local	25,317,422		0	28,108,898	0
					State Intra-LATA	15,868,276		0	6,998,004	0
	COMMON				State Inter-LATA	14,424,815		0	1,808,880	0
286	DIRECT				Interstate	6,018,460		0	1,889,810	0
					International	52,729		0	9,823	0
	COMMON				Local	7,729,760		0	7,877,485	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	300,401		0	460,137	0
					State Intra-LATA	188,283		0	251,440	0
	COMMON				State Inter-LATA	171,156		0	24,044	0
286	DIRECT				Interstate	71,411		0	68,938	0
					International	626		0	212	0
	COMMON				Local	6,230,986		0	2,213,088	0
665	DIRECT				State Intra-LATA	3,905,414		0	3,417,019	0
					State Inter-LATA	3,550,157		0	2,041,351	0
	COMMON				Interstate	1,481,231		0	544,414	0
286	DIRECT				International	12,977		0	2,097	0
					Local	17,974,527		0	11,229,395	0
	COMMON				State Intra-LATA	11,265,948		0	8,333,628	0
665	DIRECT				State Inter-LATA	10,241,138		0	19,134,056	0
					Interstate	4,272,906		0	2,491,328	0
	COMMON				International	37,436		0	12,866	0

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PREPAID CALLS

TOTAL ICS INFORMATION

2014 (Annualized)									
Number of Facilities	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
					151,274,290		0	121,035,478	0

2014										
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
138	DIRECT				Local	477,831		0	404,503	0
	COMMON				State Intra-LATA	370,696		0	252,274	0
226	DIRECT				State Inter-LATA	304,497		0	70,008	0
	COMMON				Interstate	100,505		0	71,618	0
	DIRECT				International	1,068		0	144	0
	COMMON				Local	2,803,295		0	2,575,582	0
229	DIRECT				State Intra-LATA	1,822,759		0	1,097,741	0
	COMMON				State Inter-LATA	1,786,393		0	839,650	0
	DIRECT				Interstate	589,631		0	542,930	0
	COMMON				International	6,269		0	5,933	0
531	DIRECT				Local	7,256,894		0	7,958,138	0
	COMMON				State Intra-LATA	4,718,580		0	1,917,346	0
	DIRECT				State Inter-LATA	4,624,438		0	751,438	0
	COMMON				Interstate	1,526,378		0	1,374,689	0
531	DIRECT				International	16,227		0	3,190	0
	COMMON				Local	24,973,730		0	28,707,178	0
	DIRECT				State Intra-LATA	16,238,427		0	7,890,161	0
	COMMON				State Inter-LATA	15,914,449		0	1,721,042	0
531	DIRECT				Interstate	5,252,848		0	3,385,226	0
	COMMON				International	55,845		0	12,084	0

2014										
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
54	DIRECT				Local	660,539		0	703,534	0
	COMMON				State Intra-LATA	429,496		0	333,991	0
	DIRECT				State Inter-LATA	420,927		0	101,710	0
	COMMON				Interstate	138,934		0	115,397	0
261	DIRECT				International	1,477		0	559	0
	COMMON				Local	5,942,422		0	2,430,204	0
	DIRECT				State Intra-LATA	3,863,884		0	3,713,916	0
	COMMON				State Inter-LATA	3,786,794		0	2,334,096	0
645	DIRECT				Interstate	1,249,899		0	864,638	0
	COMMON				International	13,288		0	3,310	0
	DIRECT				Local	18,394,060		0	14,004,422	0
	COMMON				State Intra-LATA	11,960,192		0	9,895,522	0
645	DIRECT				State Inter-LATA	11,721,571		0	23,688,799	0
	COMMON				Interstate	3,868,914		0	3,250,274	0
645	DIRECT				International	41,132		0	14,232	0
	COMMON							0		

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							46,538,072		0	36,545,520	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	DIRECT	248						Local	109,002	0	0	138,110	0
	COMMON							State Intra-LATA	111,167	0	0	53,760	0
								State Inter-LATA	177,733	0	0	18,708	0
100-349	DIRECT	268						Interstate	64,134	0	0	13,487	0
	COMMON							International	1,145	0	0	186	0
								Local	542,260	0	0	391,078	0
350-999	DIRECT	258						State Intra-LATA	553,076	0	0	170,575	0
	COMMON							State Inter-LATA	884,250	0	0	96,649	0
								Interstate	319,079	0	0	55,322	0
1000 & Over	DIRECT	561						International	5,699	0	0	2,375	0
	COMMON							Local	1,385,395	0	0	1,073,891	0
								State Intra-LATA	1,412,909	0	0	393,865	0
5000 - 19,999	DIRECT	300						State Inter-LATA	2,288,938	0	0	183,582	0
	COMMON							Interstate	815,131	0	0	135,267	0
								International	14,559	0	0	3,549	0
20,000 & Over	DIRECT	638						Local	4,616,701	0	0	4,921,439	0
	COMMON							State Intra-LATA	4,708,392	0	0	1,387,659	0
								State Inter-LATA	7,527,706	0	0	375,794	0
							Interstate	2,716,361	0	0	331,822	0	
							International	48,317	0	0	25,000	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	DIRECT	51						Local	70,416	0	0	126,896	0
	COMMON							State Intra-LATA	71,815	0	0	161,157	0
								State Inter-LATA	114,816	0	0	109	0
5000 - 19,999	DIRECT	300						Interstate	41,431	0	0	20,037	0
	COMMON							International	740	0	0	434	0
								Local	1,210,458	0	0	610,624	0
20,000 & Over	DIRECT	638						State Intra-LATA	1,234,498	0	0	1,286,410	0
	COMMON							State Inter-LATA	1,973,697	0	0	3,456,579	0
								Interstate	712,203	0	0	705,443	0
							International	12,721	0	0	4,424,475	0	
							Local	3,017,706	0	0	1,862,044	0	
							State Intra-LATA	3,077,640	0	0	3,655,491	0	
							State Inter-LATA	4,920,484	0	0	9,486,651	0	
							Interstate	1,735,545	0	0	969,791	0	
							International	31,713	0	0	6,421	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
					21,995,671	
						0
						13,317,552
						0
						0

2013						
Number of Facilities	Telecom Costs	Equip Costs	Security Costs	Other	Jurisdiction	Commissions Paid
174	DIRECT				Local	55,340
					State Intra-LATA	49,480
	COMMON				State Inter-LATA	66,234
					Interstate	25,986
244	DIRECT				Local	586
					Local	285,160
	COMMON				State Intra-LATA	254,965
					State Inter-LATA	341,297
245	DIRECT				Interstate	133,904
	COMMON				International	3,022
					Local	781,499
					State Intra-LATA	698,748
550	DIRECT				State Inter-LATA	935,349
	COMMON				Interstate	366,974
					International	8,281
					Local	2,859,657
					State Intra-LATA	2,288,620
					State Inter-LATA	3,063,564
					Interstate	1,201,957
					International	27,124

2013						
Number of Facilities	Telecom Costs	Equip Costs	Security Costs	Other	Jurisdiction	Commissions Paid
49	DIRECT				Local	30,371
					State Intra-LATA	27,195
	COMMON				State Inter-LATA	36,590
					Interstate	14,262
286	DIRECT				Local	322
					Local	629,969
	COMMON				State Intra-LATA	563,263
					State Inter-LATA	753,988
665	DIRECT				Interstate	295,819
	COMMON				International	6,676
					Local	1,817,271
					State Intra-LATA	1,624,844
					State Inter-LATA	2,175,028
					Interstate	853,349
					International	19,257

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	196,615	0
					State Intra-LATA	173,316	0
					State Inter-LATA	241,290	0
					Interstate	64,824	0
229	DIRECT				International	1,549	0
					Local	508,971	0
	COMMON				State Intra-LATA	448,663	0
					State Inter-LATA	624,524	0
					Interstate	167,810	0
					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
					Interstate	577,488	0
					International	137,797	0
					Local	471,530	0

2014							
Number of Facilities	Telecom Costs	Equip Costs	Security Costs	Other	Jurisdiction	Commissions Paid	Revenue Producing MOU
54	DIRECT				Local	46,326	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
					State Intra-LATA	367,395	0
					State Inter-LATA	511,402	0
					Interstate	137,414	0
645	DIRECT				International	3,283	0
					Local	1,290,090	0
	COMMON				State Intra-LATA	1,137,228	0
					State Inter-LATA	1,582,983	0
					Interstate	405,348	0
					International	101,162	0

REDACTED - FOR PUBLIC INSPECTION

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	30,186,048
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					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					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					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					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					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					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					Local	0		n/a	0	n/a
	COMMON					State Intra-LATA State Inter-LATA Interstate International	0		n/a	0	n/a

REDACTED - FOR PUBLIC INSPECTION

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	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	0		n/a	0	n/a
					State Intra-LATA	0		n/a	0	n/a
	COMMON				State Inter-LATA	0		n/a	0	n/a
244	DIRECT				Interstate	0		n/a	0	n/a
					International	0		n/a	0	n/a
	COMMON				Local	0		n/a	0	n/a
245	DIRECT				State Intra-LATA	0		n/a	0	n/a
					State Inter-LATA	0		n/a	0	n/a
	COMMON				Interstate	0		n/a	0	n/a
550	DIRECT				International	0		n/a	0	n/a
					Local	0		n/a	0	n/a
	COMMON				State Intra-LATA	0		n/a	0	n/a
					State Inter-LATA	0		n/a	0	n/a
					Interstate	0		n/a	0	n/a
					International	0		n/a	0	n/a

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	0		n/a	0	n/a
					State Intra-LATA	0		n/a	0	n/a
	COMMON				State Inter-LATA	0		n/a	0	n/a
286	DIRECT				Interstate	0		n/a	0	n/a
					International	0		n/a	0	n/a
	COMMON				Local	0		n/a	0	n/a
665	DIRECT				State Intra-LATA	0		n/a	0	n/a
					State Inter-LATA	0		n/a	0	n/a
	COMMON				Interstate	0		n/a	0	n/a
					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

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
					0		87,295,766	0	21,448,917

2014										
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
138	DIRECT				Local	0		n/a	0	n/a
					State Intra-LATA	0		n/a	0	n/a
	COMMON				State Inter-LATA	0		n/a	0	n/a
226	DIRECT				Interstate	0		n/a	0	n/a
					International	0		n/a	0	n/a
	COMMON				Local	0		n/a	0	n/a
229	DIRECT				State Intra-LATA	0		n/a	0	n/a
					State Inter-LATA	0		n/a	0	n/a
	COMMON				Interstate	0		n/a	0	n/a
531	DIRECT				International	0		n/a	0	n/a
					Local	0		n/a	0	n/a
	COMMON				State Intra-LATA	0		n/a	0	n/a
					State Inter-LATA	0		n/a	0	n/a
					Interstate	0		n/a	0	n/a
					International	0		n/a	0	n/a

2014										
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
54	DIRECT				Local	0		n/a	0	n/a
					State Intra-LATA	0		n/a	0	n/a
	COMMON				State Inter-LATA	0		n/a	0	n/a
261	DIRECT				Interstate	0		n/a	0	n/a
					International	0		n/a	0	n/a
	COMMON				Local	0		n/a	0	n/a
645	DIRECT				State Intra-LATA	0		n/a	0	n/a
					State Inter-LATA	0		n/a	0	n/a
	COMMON				Interstate	0		n/a	0	n/a
					International	0		n/a	0	n/a

REDACTED - FOR PUBLIC INSPECTION

HOLDING COMPANY NAME: Global Tel-Link Corporation

FILING DATE: 8/22/2014

ANCILLARY FEES

		2012		2013				
		TOTAL ANNUAL LITARY FEES		TOTAL ANNUAL LITARY FEES				
		N/A		N/A				
		Demand		Demand				
		Direct Costs		Direct Costs				
		Common Costs		Common Costs				
TOTAL								
CS Ancillary Charges								
BY FEE								
Fee Description	State	Applies to Pre-emptive (A) or non-pre-emptive (B) (A/B)	Applies to Local (A), State (B) or International (C) (A/B/C)	Recurring Charge	Non-Recurring Charge	Demand	Direct Costs	Common Costs
Administrative fee - \$150.00 per month	AL, AR, AZ, CA, CO, CT, DC, DE, FL, GA, IL, IN, IA, KS, KY, LA, MA, MD, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NY, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WY	B	APR, A, B, C, L, Ints S, Ints T			259,232		
Administrative fee - \$150.00 per month	AL, AR, AZ, CA, CO, CT, DC, DE, FL, GA, IL, IN, IA, KS, KY, LA, MA, MD, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NY, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WY	B	APR, A, B, C, L, Ints S, Ints T			1,102,230		
Administrative fee - \$150.00 per month	AL, AR, AZ, CA, CO, CT, DC, DE, FL, GA, IL, IN, IA, KS, KY, LA, MA, MD, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NY, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WY	B	APR, A, B, C, L, Ints S, Ints T			328,840		
Administrative fee - \$150.00 per month	AL, AR, AZ, CA, CO, CT, DC, DE, FL, GA, IL, IN, IA, KS, KY, LA, MA, MD, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NY, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WY	B	APR, A, B, C, L, Ints S, Ints T			265,162		
Administrative fee - \$150.00 per month	AL, AR, AZ, CA, CO, CT, DC, DE, FL, GA, IL, IN, IA, KS, KY, LA, MA, MD, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NY, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WY	B	APR, A, B, C, L, Ints S, Ints T			1,361,533		
Administrative fee - \$150.00 per month	AL, AR, AZ, CA, CO, CT, DC, DE, FL, GA, IL, IN, IA, KS, KY, LA, MA, MD, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NY, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WY	B	APR, A, B, C, L, Ints S, Ints T			8,612,201		
Administrative fee - \$150.00 per month	AL, AR, AZ, CA, CO, CT, DC, DE, FL, GA, IL, IN, IA, KS, KY, LA, MA, MD, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NY, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WY	B	APR, A, B, C, L, Ints S, Ints T			1,510,195		
Administrative fee - \$150.00 per month	AL, AR, AZ, CA, CO, CT, DC, DE, FL, GA, IL, IN, IA, KS, KY, LA, MA, MD, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NY, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WY	B	APR, A, B, C, L, Ints S, Ints T			20,844,839		
Administrative fee - \$150.00 per month	AL, AR, AZ, CA, CO, CT, DC, DE, FL, GA, IL, IN, IA, KS, KY, LA, MA, MD, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NY, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WY	B	APR, A, B, C, L, Ints S, Ints T			11,440,798		
Administrative fee - \$150.00 per month	AL, AR, AZ, CA, CO, CT, DC, DE, FL, GA, IL, IN, IA, KS, KY, LA, MA, MD, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NY, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WY	B	APR, A, B, C, L, Ints S, Ints T			387,462		
Administrative fee - \$150.00 per month	AL, AR, AZ, CA, CO, CT, DC, DE, FL, GA, IL, IN, IA, KS, KY, LA, MA, MD, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NY, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WY	B	APR, A, B, C, L, Ints S, Ints T			4,698		
Administrative fee - \$150.00 per month	AL, AR, AZ, CA, CO, CT, DC, DE, FL, GA, IL, IN, IA, KS, KY, LA, MA, MD, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NY, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WY	B	APR, A, B, C, L, Ints S, Ints T			89,035		

REDACTED - FOR PUBLIC INSPECTION

HOLDING COMPANY NAME: Global Tel "Link" Corporation
 FT NUMBER: 61222014

ANCILLARY FEES

		2011		2012		2013	
		TOTAL ANCILLARY FEES		Demand		Common Costs	
		TOTAL		Demand		Common Costs	
		BY FEE		Demand		Common Costs	
Fee Description	State	Applicable to Prisons (P) or other (B)	Applicable to International (Int)	Board Fee Charge	Non-Boarding Charge	Demand FV/3	Common Costs
Administrative Fee - \$150.00 per month	AL, AR, AZ, CA, CO, CT, DE, FL, GA, HI, IL, IN, IA, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, DC	B				228.034	
Administrative Fee - \$150.00 per month	AL, AR, AZ, CA, CO, CT, DE, FL, GA, HI, IL, IN, IA, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, DC	B				901.133	
Administrative Fee - \$150.00 per month	AL, AR, AZ, CA, CO, CT, DE, FL, GA, HI, IL, IN, IA, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, DC	B				553.040	
Administrative Fee - \$150.00 per month	AL, AR, AZ, CA, CO, CT, DE, FL, GA, HI, IL, IN, IA, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, DC	B				197.281	
Administrative Fee - \$150.00 per month	AL, AR, AZ, CA, CO, CT, DE, FL, GA, HI, IL, IN, IA, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, DC	B				2,913.90	
Administrative Fee - \$150.00 per month	AL, AR, AZ, CA, CO, CT, DE, FL, GA, HI, IL, IN, IA, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, DC	B				10,851.183	
Administrative Fee - \$150.00 per month	AL, AR, AZ, CA, CO, CT, DE, FL, GA, HI, IL, IN, IA, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, DC	B				1,578.101	
Administrative Fee - \$150.00 per month	AL, AR, AZ, CA, CO, CT, DE, FL, GA, HI, IL, IN, IA, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, DC	B				21.02306	
Administrative Fee - \$150.00 per month	AL, AR, AZ, CA, CO, CT, DE, FL, GA, HI, IL, IN, IA, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, DC	B				12,623.954	
Administrative Fee - \$150.00 per month	AL, AR, AZ, CA, CO, CT, DE, FL, GA, HI, IL, IN, IA, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, DC	B				377.238	
Administrative Fee - \$150.00 per month	AL, AR, AZ, CA, CO, CT, DE, FL, GA, HI, IL, IN, IA, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, DC	B				2,450	
Administrative Fee - \$150.00 per month	AL, AR, AZ, CA, CO, CT, DE, FL, GA, HI, IL, IN, IA, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, DC	B				88.6.8	

REDACTED - FOR PUBLIC INSPECTION

HOLDING COMPANY NAME: Global TelLink Corporation
 FILING DATE: 6/22/2014

ANCILLARY FEES

		2014	
		Demand	Common Costs
TOTAL		n/a	
TOTAL ANCILLARY FEES			
US Ancillary Charges	State	Applies to Jurisdiction (State, Federal, or Both)	Direct Costs
BY FEE			
Fee Discrepancy	AL, AR, AZ, CA, CO, CT, DE, DC, FL, GA, IA, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NC, ND, OH, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY	L, B1, B, Int'l, L, Int'l S, Int'l	211,344
Monthly bill statement fee - \$1.50 - \$5.00 per month	AL, AR, AZ, CA, CO, CT, DE, DC, FL, GA, IA, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NC, ND, OH, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY	L, B1, B, Int'l, L, Int'l S, Int'l	822,929
State regulatory cost Review of fee to ELEC bid calls	AL, AR, AZ, CA, CO, CT, DE, DC, FL, GA, IA, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NC, ND, OH, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY	L, B1, B, Int'l, L, Int'l S, Int'l	355,855
State regulatory cost Review of fee to ELEC bid calls	AL, AR, AZ, CA, CO, CT, DE, DC, FL, GA, IA, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NC, ND, OH, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY	L, B1, B, Int'l, L, Int'l S, Int'l	195,817
Per call admin in at wireline - Tennessee - \$0.15 to call	AL, AR, AZ, CA, CO, CT, DE, DC, FL, GA, IA, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NC, ND, OH, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY	L, B1, B, Int'l, L, Int'l S, Int'l	3,049,965
Cost for processing fee in administrations of 5000	AL, AR, AZ, CA, CO, CT, DE, DC, FL, GA, IA, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NC, ND, OH, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY	L, B1, B, Int'l, L, Int'l S, Int'l	11,408,021
Fee to USF Admin fee for non-ELEC bid calls	AL, AR, AZ, CA, CO, CT, DE, DC, FL, GA, IA, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NC, ND, OH, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY	L, Int'l, L, Int'l, L, Int'l S, Int'l	3,419,095
State regulatory cost Review of fee to non-ELEC bid calls	AL, AR, AZ, CA, CO, CT, DE, DC, FL, GA, IA, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NC, ND, OH, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY	L, B1, B, Int'l, L, Int'l S, Int'l	29,077,284
Wireless admin in at wireline - \$5 to 88 or value of call	AL, AR, AZ, CA, CO, CT, DE, DC, FL, GA, IA, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NC, ND, OH, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY	L, B1, B, Int'l, L, Int'l S, Int'l	11,851,042
Account close-out fee	AL, AR, AZ, CA, CO, CT, DE, DC, FL, GA, IA, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NC, ND, OH, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY	L, B1, B, Int'l, L, Int'l S, Int'l	215,623
Cost for alpha back fee - \$25	MI, WI, WV, WY	L, B1, B, Int'l, L, Int'l S, Int'l	
Minimum payment fee - \$5	AL, AR, AZ, CA, CO, CT, DE, DC, FL, GA, IA, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NC, ND, OH, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY	L, B1, B, Int'l, L, Int'l S, Int'l	76,670

**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.

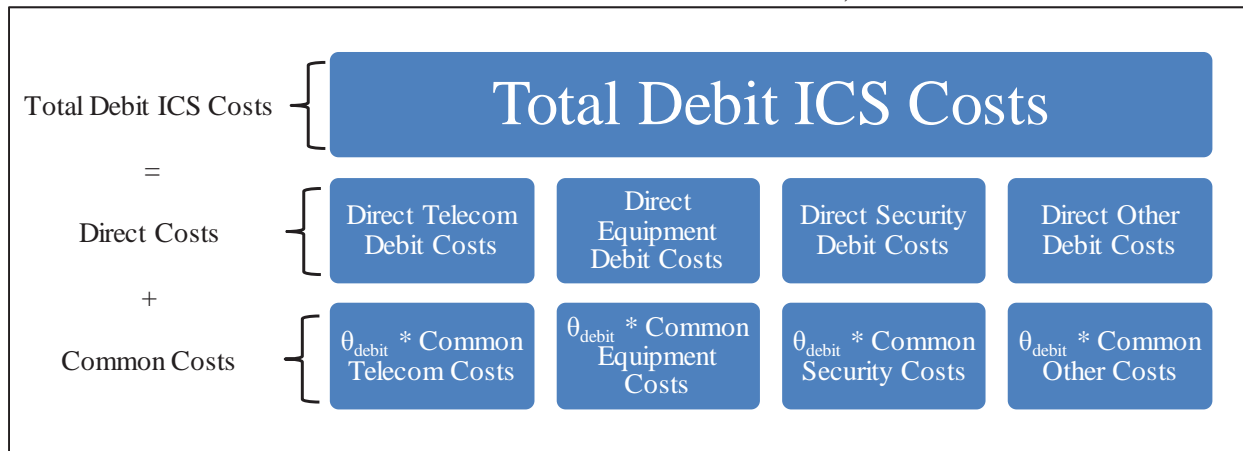
such as service, maintenance, and repair (“SMR”), or those related to “wear and tear,” are increasing in direct proportion with the amount of time spent on a call; in this regard MOUs provide a more precise representation of cost allocation than does the number of calls placed. Aside from the bad debt 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

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Previous Employment

Senior Consultant, Snavelly, 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.

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“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.

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

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

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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).