

ORIGINAL

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Vicki Gordon Kaufman
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April 6, 2007
VIA HAND DELIVERY

Blanca S. Bayo, Director
Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

This claim of confidentiality was filed by or on behalf of a "telco" for Confidential DN 02979-07. The document is in locked storage pending advice on handling. To access the material, your name must be on the CASR. If undocketed, your division director must provide written permission before you can access it.

(See DN 02095-07)

Re: CONFIDENTIAL MATERIALS ENCLOSED
Docket No. 060614-TC - T-NETIX Telecommunications Systems, Inc.'s Amended Response to Staff Data Request

Dear Ms. Bayo:

Attached is T-NETIX Telecommunications Systems, Inc.'s CONFIDENTIAL Amended Response to Staff's February 6, 2007 Data Request, as limited by the objections and conditions set forth in the response. This amended response is identical to the original response with the exception of the Bates numbers. Bates numbers 00256-00268 were stamped on the confidential documents attached to the original response. Bates numbers 00256-00261 of that filing were inadvertently duplicated from Evercom's (T-Netix's) Supplemental Response to Staff's Subpoena, Request #4 filed in this matter on December 13, 2006. The Bates numbers on the enclosed confidential documents are 00262-00274; these confidential documents should be

replaced for the confidential documents provided with the original response of December 13, 2006.

The enclosed amended response constitutes proprietary confidential business information of T-NETIX within the meaning of Section 364.183(1), Florida Statutes, and rule 25-22.06(5), Florida Administrative Code. This amended response contains sensitive business information relating to competitive interests, and the public disclosure of this information would impair the competitive business of T-NETIX. Thus, this information should be held exempt from the public disclosure requirements of section 119.07, Florida Statutes.

One copy is enclosed which highlights the information for which T-NETIX claims confidentiality. Two redacted copies of the confidential information are also enclosed.

- CMP
- COM
- CTR
- ECR
- GCL
- OFC
- PCA
- SCR
- SCA
- SEC
- OTH

1 copy records

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

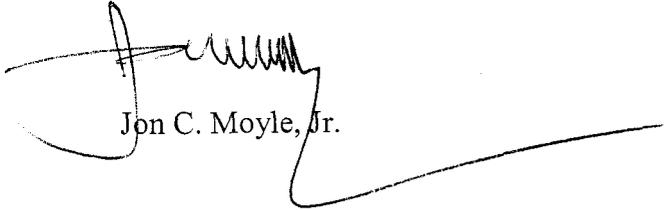
02978 APR-6 5

FPSC-COMMISSION CLERK

Ms. Bayo
April 6, 2007
Page 2 of 2

Thank you for your assistance. Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Jon C. Moyle, Jr.", with a long horizontal flourish extending to the right.

JCMJ/pg
Enclosure

cc: Lee Eng Tan
Adam Teitzman
Floyd Self
Tracy Hatch
Curtis Hopfinger

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Compliance investigation of TCG Public Communications, Inc. for apparent violation of Section 364.183(1), F.S., Access to Company Records, and determination of amount and Appropriate method for refunding overcharges For collect calls made from inmate pay telephones

Docket No. 060614-TC

Filed: April 6, 2007

T-NETIX TELECOMMUNICATION SYSTEMS, INC.'S AMENDED RESPONSE TO STAFF'S INFORMAL DATA REQUEST

T-NETIX Telecommunication Systems, Inc. (T-Netix),¹ hereby provides its amended responses to the Commission Staff's informal data request which, by agreement, was sent to counsel for T-NETIX on February 6, 2007.

General Objections to Requests and Limitations on Responses

T-NETIX is not a party to this docket. The regulated company that is the subject of this investigation is TCG Public Communications, Inc. (TCG). Neither T-NETIX's filing of this response nor its provision of any documents or responses should be construed as an intervention or appearance either as a party or interested person in connection with this proceeding, or as T-NETIX's agreement or consent to respond further in connection with this matter. T-NETIX provides this response so as to cooperate with the Commission Staff in this docket.

Staff has not delineated any time frame governing the information it seeks. An unspecified time frame for the information sought is unreasonable. Therefore, T-NETIX has provided information for the last three (3) years, with the exception of Request No. 3, where calling data is provided for the last six (6) years. In addition, T-NETIX is a

¹ While Staff's request for information is addressed to Evercom Systems, Inc., Evercom Systems, Inc. does not provide service in the Dade County facilities at issue in this docket. T-NETIX Telecommunications Systems, Inc. is the entity that provides service. Therefore, the requests have been answered on that basis.

corporation with employees located in many different locations in Florida and in other states. T-NETIX has made its best efforts to diligently search its files for the requested information (as limited by the objections and limitations set out herein). To the extent the Staff informal requests purport to require more, such requests would impose an undue burden and expense on T-NETIX.

Requests and Responses

Request No. 1: For each of the Miami-Dade facilities, please identify if Three-Way Detection software was installed.

- A. Provide the date that the software was installed at each facility.
- B. Provide the date that the software was activated at each facility.

Response: **Response is confidential and has been redacted.**

Request No. 2: Please identify the technicians responsible for maintaining and monitoring the Three-Way Detection software at each facility.

- A. For each facility, provide the period for each technician that has been or presently assigned to monitor and maintain the Three-Way Detection software.
- B. For each facility, provide the period for each supervisor that has been or presently assigned to monitor and maintain the Three-Way Detection software.

Response: **Response is confidential and has been redacted.**

Request No. 3: For each facility, where the Three-Way Detection software was installed, provide the following:

- A. The number of calls made from the inmate payphone system since the Three-Way detection software installation. (By month)
- B. The number of calls interrupted due to Three-Way call attempts detected by the system since the date of the software installation. (By month)
- C. The number of calls interrupted due to DTMF detection by the system since the date of the Three-Way Detection software installation. (By month)

Response: Response is confidential and has been redacted.

Request No. 4: What are the criteria for setting the sensitivity level on the Three-Way Detection software?

Response: Response is confidential and has been redacted.

Request No. 5: Please explain how the software differentiates between a Three-Way attempt and DTMF attempt?

Response: Response is confidential and has been redacted.

Request No. 6: Who is the primary person to have the ability to modify settings on the Three-Way Detection software?

Response: Response is confidential and has been redacted.

Request No. 7: What is the self adjustment component to the Three-Way detection software? Please answer the following:

- A. How often is the software set to self adjust?
- B. Are records kept of each self adjustment?
- C. Is there a max percentage set for the sensitivity level?

Response: Response is confidential and has been redacted.

Request No. 8: For each facility, please provide the names of the personnel responsible for providing reports on the status and performance of the sensitivity levels during the time the software has been activated.

Response: Response is confidential and has been redacted.

Request No. 9: Are there records used to record the sensitivity settings for each facility?

Response: Response is confidential and has been redacted.

Request No. 10: If the response to Interrogatory No. 9 is affirmative, please provide copies of the log books that were used to record the sensitivity settings at each facility.

Response: Response is confidential and has been redacted.

Request No. 11: Please identify all other facilities where your company has installed the Three-Way Detection software within the state of Florida.

Response: **Response is confidential and has been redacted.**

Request No. 12: If other facilities within the state of Florida are identified, then please provide answers to questions 1 through 10 above.

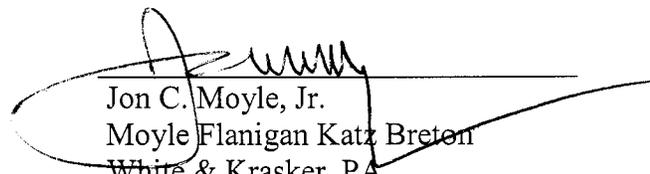
Response: **Response is confidential and has been redacted.**

Request No. 13: Is there a refund policy in place for customers when it has been determined that a call was incorrectly dropped by the Three-Way detection software? If so, what does the customer need to provide to be eligible?

Response: **Response is confidential and has been redacted.**

Request No. 14: In June 2006, Evercom provided to the Commission a report detailing that the number of calls repeated within 10 minutes of drop was over 519,000 for the Miami- Dade Pretrial detention center. However, the number reported to the Commission in December of 2006, for **all** Miami-Dade facilities was significantly lower. Please explain the discrepancy.

Response: **Response is confidential and has been redacted.**



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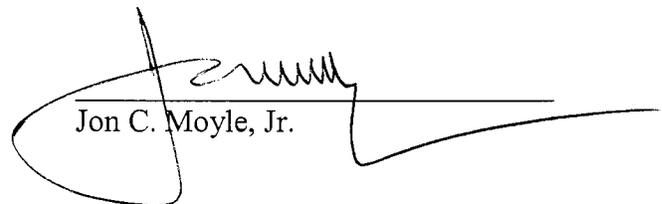
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Amended Response to Staff's Informal Data Request was furnished by (*) hand delivery and U.S. Mail this 6th day of April, 2007, to:

(*)Adam Teitzman
(*)Lee Eng Tan
Staff Counsel
Florida Public Service Commission
Division of Legal Services
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Jon C. Moyle, Jr.

State of Florida



Public Service Commission

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TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: 4-6-07
TO: J Moyle
FROM: T. Henry, Division of the Commission Clerk &
Administrative Services
RE: **Acknowledgment of Receipt of Confidential Filing**

02979-07

This will acknowledge receipt of a **CONFIDENTIAL DOCUMENT** filed in Docket No. 060614-TC or (if filed in an undocketed matter) concerning Amended response to staff data request, and filed on behalf of T-NETIX / Th ~~Kaufman~~ Moyle. The document will be maintained in locked storage.

Any questions regarding this matter should be directed to Marguerite Lockard at (850) 413-6770.

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