

November 16, 2017

VIA ELECTRONIC FILING

Mr. Braulio L. Baez
Executive Director
Florida Public Service Commission
2540 Schumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Notification Regarding the Transfer of Indirect Control of Securus Technologies, Inc. and T-NETIX Telecommunications Services, Inc. to SCRS Acquisition Corporation

Dear Executive Director Baez:

By this letter, Securus Investment Holdings, LLC (“Transferor” or “SIH”), Securus Technologies, Inc. (“STI”), T-NETIX Telecommunications Services, Inc. (“TNTS”) and SCRS Acquisition Corporation (“Transferee” or “SCRS”) (collectively, the “Parties”) notify the Commission of a transaction, completed on November 1, 2017, that resulted in the transfer of indirect control of STI and TNTS to SCRS (the “Transaction”). Commission action or prior notice was not required for the Transaction, but the Parties are submitting this letter as a courtesy solely for informational purposes.

With respect to the Transaction, the Parties provide the following information:

Description of the Parties

A. Securus Technologies, Inc., T-NETIX Telecommunications Services, Inc., and Securus Investment Holdings, LLC

STI is a Delaware corporation with its principal place of business at 4000 International Parkway, Carrollton, Texas 75007. STI is a wholly-owned, indirect subsidiary of Connect Acquisition Corp. (“Connect”), a Delaware corporation and a wholly-owned, direct subsidiary of Transferor. STI provides telecommunications services to a number of confinement and correctional facilities in the District of Columbia and approximately 46 states, including in the State of Florida.¹ In Florida, STI is an authorized interexchange carrier (Company Code TJ054) and pay telephone provider (Company Code TG225). STI is also authorized by the FCC to provide domestic and international telecommunications services.

TNTS, a Texas corporation, is a wholly-owned subsidiary of T-NETIX, Inc., a Delaware corporation and wholly-owned subsidiary of STI. TNTS is currently authorized as a pay telephone

¹ In addition, STI, through its operating subsidiaries, provides various additional products, services and technologies to the correctional and law enforcement community.

provider (Company Code TG001) in Florida. TNTS is also authorized by the FCC to provide domestic and international telecommunications services.

Transferor, a Delaware limited liability company, is a holding company with no operations of its own. Transferor's principal address is c/o ABRY Partners, 888 Boylston St., Ste. 1600, Boston, Massachusetts 02199. Prior to the Transaction, the controlling interests in Transferor were held by ABRY Partners VII, L.P., an affiliate of ABRY Partners, a Boston-based private equity investment firm focused solely on media, communications, business, and information services investments.

B. SCRS Acquisition Corporation

Transferee is a Delaware corporation established for the purposes of the Transaction. Transferee's principal address is c/o Platinum Equity, 360 North Crescent Drive, South Building, Beverly Hills, California 90210. Transferee is ultimately wholly-owned by SCRS Holding Corporation ("SCRS Parent"), a Delaware corporation. SCRS Parent is a holding company in which certain private equity investment vehicles sponsored by Platinum Equity, LLC (together with its affiliates, "Platinum Equity") have contributed their equity investments in connection with the Transaction. Platinum Equity Capital Partners IV, L.P. ("PECP IV"), a Delaware limited partnership, is now the majority owner of SCRS Parent.

Founded in 1995 by Tom Gores, Platinum Equity (www.platinumequity.com) is a global investment firm with more than \$11 billion of assets under management and a portfolio of approximately 30 operating companies that serve customers around the world. The firm is currently investing from PECP IV, a \$6.5 billion global buyout fund. Platinum Equity specializes in mergers, acquisitions and operations, acquiring and operating companies in a broad range of business markets, including manufacturing, distribution, transportation and logistics, equipment rental, metals services, media and entertainment, technology, telecommunications and other industries. Over the past 22 years Platinum Equity has completed more than 185 acquisitions including prior telecommunications investments.² As such, Platinum Equity has demonstrated its qualification and capabilities to own a telecommunications carrier.

² Currently, STI and the subsidiary TNTS are the only portfolio companies of Platinum Equity that are U.S. telecommunications carriers. Platinum Equity's prior investments in telecommunications carriers include but are not limited to: Covad, DSLnet and Matrix Telecom.

Designated Contacts

Questions, correspondence or other communications concerning this informational filing should be directed to:

For Transferee:

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With copies for Transferee to

Eva M. Kalawski
Executive Vice President, General Counsel
& Secretary
c/o Platinum Equity
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Beverly Hills, California 90210
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For Transferor and STI:

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and:

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Vice President, General Counsel & Secretary
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Description of the Transaction

Pursuant to that certain Stock Purchase Agreement by and among SIH, Connect and SCRS, dated as of April 29, 2017 (the "Agreement"), SCRS acquired all the stock of Connect from SIH on November 1, 2017. As a result, Connect is now a wholly-owned, direct subsidiary of SCRS; STI and TNTS are wholly-owned, indirect subsidiaries of SCRS (and its parent companies). PECP IV is the ultimate majority owner of STI and TNTS.

For the Commission's reference, charts depicting the pre- and post-Transaction ownership of STI are provided as Exhibit A.

Following completion of the Transaction, STI and TNTS have continued to be managed and operated by the same officers and personnel, but supplemented by management of Transferee and Platinum Equity. Further, STI and TNTS have access to additional financial resources through its relationship with Transferee and Platinum Equity, enabling them to better meet the needs of its customers and thus better compete in the telecommunications marketplace. The Transaction was transparent to the customers of STI and TNTS and did not involve the sale, assignment, lease or transfer of any of their assets or customer bases to any other entity. STI and TNTS did not merge or combine with any other entity and have remained separate entities providing the services they have been providing under their current names. There were no associated changes in the terms or conditions of the services being provided. The only change immediately following closing of the

Mr. Braulio L. Baez, Executive Director

November 16, 2017

Page 4

Transaction from a customer's perspective was that that STI's and TNTS's ownership changed, with Transferee (and its parent companies) being its indirect owner.

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We would appreciate acknowledgement of receipt and acceptance of this filing, which is being filed electronically. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

/s/ Brett P. Ferenchak

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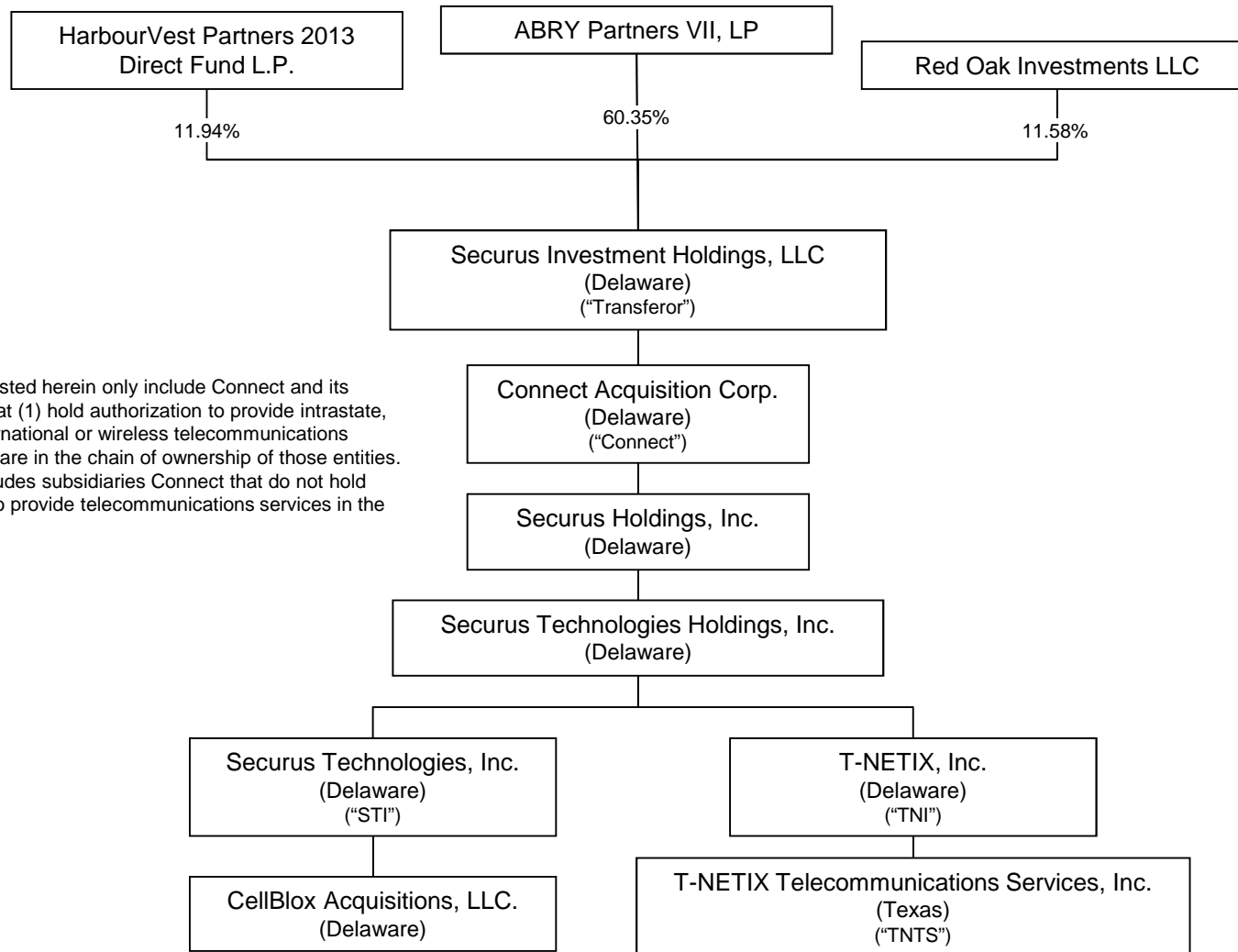
paul.besozzi@squirepb.com

Counsel for Transferor and STI

EXHIBIT A

Charts of the Pre-Transaction and Current Ownership Structures

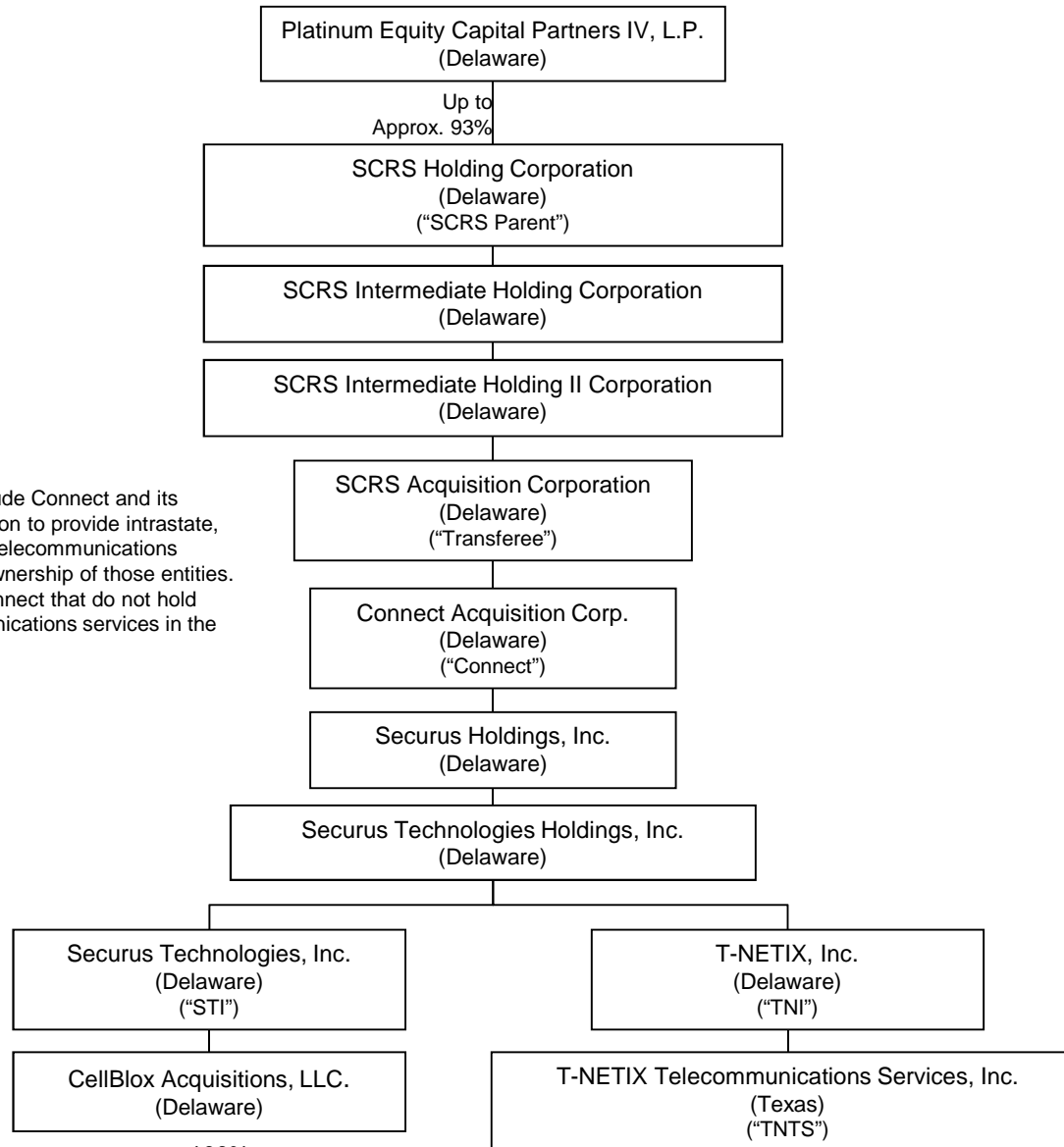
Pre-Transaction Ownership Structure of STI*



* The entities listed herein only include Connect and its subsidiaries that (1) hold authorization to provide intrastate, interstate, international or wireless telecommunications services or (2) are in the chain of ownership of those entities. The chart excludes subsidiaries Connect that do not hold authorization to provide telecommunications services in the United States.

Unless indicated all ownership percentages are 100%.

Current Ownership Structure of STI*



* The entities listed herein only include Connect and its subsidiaries that (1) hold authorization to provide intrastate, interstate, international or wireless telecommunications services or (2) are in the chain of ownership of those entities. The chart excludes subsidiaries Connect that do not hold authorization to provide telecommunications services in the United States.

Unless indicated all ownership percentages are 100%.