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\* ADMITTED IN DC ONLY

August 18, 2020

**Via Electronic Filing**

Adam Teitzman  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

**Re: Notification of Transfer of Customers  
Legacy Long Distance International, Inc. d/b/a Legacy Inmate  
Communications and Global Tel\*Link Corporation**

Dear Mr. Teitzman:

Legacy Long Distance International, Inc. d/b/a Legacy Inmate Communications (“Legacy”) and Global Tel\*Link Corporation (“GTL”) (Legacy and GTL collectively, the “Parties”) hereby respectfully notify the Florida Public Service Commission (“Commission”) of a pending transaction pursuant to which Legacy will assign its existing inmate calling services (“ICS”) contract with Bay County (“Bay”) to GTL (the “Transaction”). It is the Parties’ understanding that no prior Commission approval is required to consummate the Transaction described herein. The Parties therefore submit this notice for the Commission’s information.

**I. DESCRIPTION OF THE PARTIES**

**A. Legacy Long Distance International, Inc. d/b/a Legacy Inmate Communications**

Legacy is a California corporation with headquarters located at 10833 Valley View Drive, Suite 150, Cypress, CA 90830. Legacy is a wholly owned subsidiary of Jail Education Solutions, Inc. d/b/a Edovo (“Edovo”), a Delaware corporation, with its principal place of business located at 215 W. Superior Street, Suite 600, Chicago, IL 60654. Legacy is a full-service provider of inmate communications and investigative technology services at hundreds of correctional

institutions nationwide. Legacy holds Certificate No. 8903 to provide pay telephone service (February 15, 2017) and registered to provide interexchange telecommunications service in Docket No. 070083-TI (March 1, 2007).

**B. Global Tel\*Link Corporation**

GTL is an Idaho corporation with headquarters located at 3120 Fairview Park Drive, Suite 300, Falls Church, VA 22042. GTL specializes in the provision of managed inmate communications services, including ICS, and manufactures equipment used in correctional facilities. GTL holds Certificate No. 3878 to provide pay telephone service (February 27, 1996) and Certificate No. 3972 to provide interexchange telecommunications service (February 27, 1996).

**II. DESIGNATED CONTACTS**

Correspondence concerning this matter should be directed to:

<b>Legacy Long Distance International, Inc. d/b/a Legacy Inmate Communications</b>	<b>Global Tel*Link Corporation</b>
Brian Hill Chief Executive Officer 10833 Valley View Street, Suite 150 Cypress, CA 90630 Telephone: 877-553-4440 brian@edovo.com	Chérie R. Kiser Angela F. Collins Cahill Gordon & Reindel LLP 1990 K Street, NW Suite 950 Washington, DC 20006 Telephone: 202-862-8900 ckiser@cahill.com acollins@cahill.com

**III. DESCRIPTION OF THE TRANSACTION**

On July 2, 2020, GTL, Legacy, and Edovo entered into a Master Transaction Agreement (“Agreement”) pursuant to which GTL will purchase certain assets and customers of Legacy, including certain customer accounts and receivables, certain customer agreements and contracts, certain vendor agreements and contracts, and certain equipment. The assets to be purchased do not include the Commission authorizations held by Legacy. Consummation of the Transaction is contingent on, among other things, receipt of all necessary regulatory approvals.

Pursuant to the Transaction, Legacy will assign its correctional facility contract with Bay to GTL. As a result of the Transaction, GTL will provide ICS to Bay pursuant to the terms of the contract. Bay will receive notice of the Transaction as required under the terms of Legacy’s existing contract with Bay.

When inmates or their friends and family use ICS, they also will be notified that GTL is now the provider of ICS in the correctional facility via web-posting, internal posting, recorded

messages on the interactive voice response (“IVR”) system, and customer service representatives. Given ICS customers are not presubscribed customers, the customer notification requirements in Federal Communications Commission Rule 47 C.F.R. § 64.1120 do not apply.<sup>1</sup> ICS customers will receive service from GTL pursuant to the same or similar rates, terms, and conditions without any immediate changes. GTL will continue to provide a high level of technical operations and customer service to ICS customers after consummation of the Transaction.

Upon completion of the Transaction and the migration of the Bay contract to GTL, Legacy will no longer offer telecommunications services in Florida. Legacy will cancel its telecommunications authorizations after consummation of the Transaction.

#### **IV. PUBLIC INTEREST STATEMENT**

The Transaction is in the public interest, convenience, and necessity as it will permit the continued, uninterrupted provision of high-quality service to Bay, inmates, and their friends and families. The proposed Transaction will have no adverse impact on customers and will not alter the manner of service delivery to customers.

Following consummation of the Transaction, GTL will continue to provide high-quality communications services to Legacy’s customers without interruption and without immediate change in rates, terms, or conditions. Customers will benefit from the extensive telecommunications experience and expertise of GTL, which has significant experience in the ICS market. Following the Transaction, customers will continue to receive services consistent with the quality of services currently provided by Legacy that will be supported by GTL’s experienced and well-qualified management team.

If you have any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

*/s/ Chérie R. Kiser*

Chérie R. Kiser  
Angela F. Collins  
Counsel for Global Tel\*Link Corporation

#### Attachments

cc: Brian Hill, Chief Executive Officer, Legacy Long Distance International, Inc. d/b/a Legacy Inmate Communications

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<sup>1</sup> See, e.g., *Comments Invited on Application of Transcommunications Incorporated to Discontinue Domestic Telecommunications Services*, Docket No. 05-161, Public Notice, DA 05-99 (rel. Apr. 4, 2005) (granting discontinuance of prepaid calling card services without comment based on statements that the calling card provider could not provide customer notice because it did not know the identity and address of the end users that might use its service and thus it would be effectively impossible to provide written notice of the discontinuance of service).

## VERIFICATION

I, Brian Hill, state under penalty of perjury that I am the Chief Executive Officer of Legacy Long Distance International, Inc. d/b/a Legacy Inmate Communications (the “Company”); that I am authorized to make this Verification on behalf of the Company; that I have read the foregoing document; and that any statements in the foregoing document with respect to the Company, except as otherwise specifically attributed, are true and correct to the best of my knowledge, information, and belief.

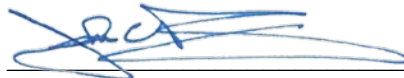
Executed on: August 17, 2020

  
\_\_\_\_\_  
Name: Brian Hill  
Title: Chief Executive Officer

## VERIFICATION

I, John C. Pitsenberger, state under penalty of perjury that I am the Chief Financial Officer of Global Tel\*Link Corporation (the “Company”); that I am authorized to make this Verification on behalf of the Company; that I have read the foregoing document; and that any statements in the foregoing document with respect to the Company, except as otherwise specifically attributed, are true and correct to the best of my knowledge, information, and belief.

Executed on: August 17, 2020



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Name: John C. Pitsenberger  
Title: Chief Financial Officer