



**SECURUS**  
TELECOMMUNICATIONS



0000107609

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VIA FEDERAL EXPRESS

January 14, 2010

Arizona Corporation Commission  
**DOCKETED**

**ORIGINAL**

JAN 19 2010

Mr. Brian C. McNeil, Executive Secretary  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007

DOCKETED BY [Signature]

JAN 19 2010  
 10:10 AM  
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**Re: Comments in Docket # T-20717A-09-0578**

Dear Mr. McNeil:

Securus Technologies, Inc. ("Securus") files this letter in order to comment on the application of Talton Communications, Inc. ("Talton") for a Certificate of Public Convenience and Necessity which is being reviewed in the above-named docket.

Securus, through its wholly owned subsidiary Evercom Systems, Inc. (Evercom), currently provides Inmate Telecommunications Service to numerous county jails and state correctional facilities in Arizona. Additionally, Securus is a subcontractor in the provision of Inmate Telephone Service for the Immigration and Customs Enforcement ("ICE") facilities in the State of Arizona.

It has come to Securus's attention that Talton has recently applied for authority to provide Inmate Telephone Service within the State of Arizona. As you know, on December 29, 2009, Securus provided a letter to the Commission informing the agency that its research showed that Talton Communications, Inc. did not have the proper authorization to provide telecommunications services in Arizona. Securus wishes to clarify that neither it nor Evercom are a predecessor or successor to this Talton entity. Rather, in Docket Nos. T-03386A-98-0595 and T-03479A-98-0595, Decision No. 61300, Evercom Systems, Inc. received the approval of the Commission to merge its subsidiaries Talton STC, Inc. and Talton InVision, Inc. into a single subsidiary, Talton InVision, Inc., and to cancel the Talton STC, Inc. authority to operate. Decision No. 61300 became effective December 22, 1998. Subsequently, the name Talton InVision, Inc. was changed to Evercom Systems, Inc. in Docket No. T-03479A-99-0312, in Decision 66548 which was effective November 14, 2003. As such, neither Securus nor Evercom is affiliated with the Talton Communications, Inc. that is currently applying for authority in the State of Arizona.

Securus reiterates its concerns that Talton lacks the necessary qualifications to provide inmate telecommunications services in this State. In May 2009, Talton Communications, Inc. was awarded a national contract with Immigration and Customs Enforcement (ICE) to provide Inmate telephone services. That contract listed all the locations in which Talton Communications, Inc. was to provide service, including locations in Arizona. It is our understanding that Talton started providing Inmate



telecommunications service in Arizona on November 20, 2009. Yet Talton Communications, Inc. did not seek certification from this State to be an authorized telecommunications provider until December 23, 2009, and only after Securus and Public Communications Services, Inc (PCS) informed ICE and various state agencies of Talton's lack of operating authority. Securus questions whether Talton would have sought the proper certifications had it not been for Securus and PCS making these agencies aware of Talton's unauthorized operation.

Securus asks that the Commission take into consideration Talton's demonstrated disregard for complying with the statutes and administrative rules of Arizona when reviewing the Talton Application in Docket # T-20717A-09-0578.

Should you have any questions, please do not hesitate to contact me at the number listed below.

Sincerely,

Richard A. Smith  
President, CEO, and Chairman of the Board  
Securus Technologies, Inc.  
972-277-0665