



January 17, 2012
Via Overnight Delivery

Ms. Catrice Williams, Commission Secretary
MA Department of Telecommunications & Cable
1000 Washington Street
Suite 820
Boston, MA 02118

**RE: Inmate Calling Solutions, LLC d/b/a ICSolutions
D.T.C. 11-16: In the matter of Petition of Recipients of Collect Calls from Prisoners at
Correctional Institutions in Massachusetts Seeking Relief From The Unjust
and Unreasonable Cost of Such Calls
Response to Petition**

Dear Ms. Williams:

Enclosed for filing please find the original and one (1) copy of this response to the Petitioners submitted on behalf of Inmate Calling Solutions, LLC in the above referenced proceeding.

Please acknowledge receipt of this filing by date-stamping the extra copy of this cover letter and returning it to me in the self-addressed, stamped envelope provided for that purpose.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3004 or via email to rnorton@tminc.com. Thank you for your assistance in this matter.

Sincerely,

Robin Norton
Consultant to Inmate Calling Solutions, LLC

cc: Kenneth Dawson - ICS
file: ICS - Massachusetts
tms: MAx1201

Enclosures
RN/lm

**Before the
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

**In the matter of: Petition of Recipients of)
Collect calls from Prisoners at Correctional)
Institutions in Massachusetts Seeking relief)
From the Unjust and Unreasonable Cost of)
Such Calls)**

D.T.C. 11-16

RESPONSE OF INMATE CALLING SOLUTIONS, LLC

Petitioners, by their counsel, filed the above captioned "Petition" with the Department of Telecommunications and Cable (the "DTC") on September 1, 2009. On May 18, 2010, at the request of the DTC, petitioners filed an amendment to the Petition clarifying their status. In that same filing, Petitioners also requested that the DTC investigate quality of service issues in connection with prisoner telephone calls. On April 27, 2011, again at the request of the DTC, Petitioners filed a second amendment to the Petition adding additional petitioners.

The Petition, as amended, alleges 1) unjust and unreasonable telephone rates; and 2) poor quality of service provided by prisoner telephone service providers including dropped calls, lack of call detail associated with prepaid services, poor customer service, equipment problems and other issues.

At the invitation of the assigned Hearing Officer, Inmate Calling Solutions, LLC d/b/a ICSolutions ("ICS") responds to the above captioned Petition, as amended, as follows:

1. ICS has a minimal presence in Massachusetts, serving only one small county correctional facility.

2. The Petition does not state any claim or allegation regarding ICS and, therefore, ICS can find no portion of the Petition to which a response is warranted with respect to its own operations and service.

3. A review of ICS' internal records, for the five year period up to and including the date of the letter to parties in this matter, uncovered no complaints in Massachusetts regarding rates or quality of service. For the purpose of such review, the term 'complaint' was defined as any correspondence from a consumer, directly or indirectly, in any tangible form, whether paper or electronic, making any reference to call rates or service quality. The term 'complaint' does not include routine account inquiries handled in the normal course.

4. Other than two passive references to ICS in exhibits to the petition, there are no substantive allegations requiring a response. Since the subject matter of the Petition is not directed at any specific business activity of ICS, ICS takes no position with respect thereto.

5. To the best of ICS' knowledge, ICS' services in Massachusetts have, at all times, been provided in full compliance with applicable regulations and in accordance with ICS' tariff on file with the DTC.

6. To the extent that any new rules or requirements are developed as a result of this proceeding, ICS hereby affirms that it will abide by and operate in conformance with such rules.

7. Participation in this proceeding would be expensive and burdensome given the small size of ICS' operations in Massachusetts.

For all the above reasons, ICS respectfully declines to participate further in these proceedings.

Sincerely,



Ken Dawson,
Director Contracts & Regulatory
Inmate Calling Solutions, LLC
2200 Danbury Street
San Antonio, TX 78217
210-581-8104