# ORIGINAL

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

06 DEC 13 PM 2: 26

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. 0606143T@\SSION

Filed: December 13, 2006

### EVERCOM SYSTEMS, INC. D/B/A CORRECTIONAL BILLING SERVICES **SUPPLEMENTAL RESPONSE TO** SUBPOENA DUCES TECUM WITHOUT DEPOSITION

Evercom Systems, Inc. d/b/a Correctional Billing Services (Evercom), hereby provides its supplemental response<sup>1</sup> to the Commission Staff subpoena served on Evercom on or about November 3, 2006.<sup>2</sup> Evercom incorporates herein its Objections to and Motion to Quash in Part or Limit the Subpoena filed on December 4, 2006. As noted in its original response, Evercom is not a party to this docket. Neither the filing of this Supplemental Response nor the provision of any documents or responses in regard to this Supplemental Response should be construed as an intervention or appearance either as a party or interested person in connection with this proceeding, or as Evercom's agreement

CMP	or consent to respond further in connection with this matter.	
СОМ		
CTR	Request No. 4:	Please provide the information below for calls that terminated and another call was completed to the same telephone number within
ECR		10 minutes for correctional facilities, identified by month and location, served by TCG in the state of Florida.  (a) LOCAL – Number of calls  (b) Intrastate – Number of calls and minutes
GCL		
OPC		
RCA		
SCR	Supplemental Response:	Responsive documents attached, which separates calls on a local and intrastate basis. This document should replace the document
SGA		
SEC	-	originally provided in response to this request. It should also be
OTH	Evercom's original response was provided on December 4, 2006.	

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER - DATE

1 1 3 9 9 DEC 13 g

<sup>&</sup>lt;sup>2</sup> Staff first attempted to serve a subpoena on Evercom on September 22, 2006, but it was apparently sent to the wrong place REGENVED & FILED

noted that in the original response to this request, filed on December 4, 2006, interstate call information was inadvertently included. Such data is included here so that the numbers in this Supplemental Response are consistent with those originally provided; however, the provision of interstate information is not an admission that the Commission has jurisdiction over interstate calls or an agreement that Evercom will file such information in the future.

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Attorneys for Evercom Systems, Inc. d/b/a Correctional Billing Services

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Response to Subpoena Duces Tecum Without Deposition was furnished by (\*) hand delivery and U.S. Mail this 13<sup>th</sup> day of December, 2006 to:

(\*)Adam Teitzman (\*)Lee Eng Tan Staff Counsel Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 ateitzma@psc.state.fl.us ltan@psc.state.fl.us

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Vicki Gordon Kaufman

### Docket No. 060614-TC

## **Evercom Supplemental Response to Staff Subpoena**

#4

### **CONFIDENTIAL**

Supplemental response to Staff Subpoena #4 is confidential and has been redacted in its entirety.