



November 30, 2016

**VIA E-FILE**

**David P. Zambito**

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Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Kenneth Andre Dade (EA-6297) v. Securus Technologies, Inc.; Docket No. C-2016-2547396**

**CORRECTIONS TO SECURUS TECHNOLOGIES, INC.'S ANSWER AND NEW MATTER**

Dear Secretary Chiavetta:

The purpose of this letter is to correct the following two facts that were represented in the Answer and New Matter of Securus Technologies, Inc. ("Securus") in the above-referenced matter:

- (1) In the second sentence of Paragraph 4 of the Answer and New Matter, Securus admitted that an inmate at State Correctional Institute Fayette ("SCI-Fayette") may pay for a telephone call via a "prepaid calling card." This admission is not accurate. Securus does not offer prepaid calling cards at SCI-Fayette. An inmate may pay only through an inmate debit account established through SCI-Fayette.
- (2) In the first sentence of the second paragraph of Paragraph 4 and in the first sentence of Paragraph 12, Securus stated that the notice contained in Appendix A was posted 60 days in advance of April 1, 2016. Upon further investigation, this statement is not accurate. Due to an internal miscommunication by SCI-Fayette personnel, the notice was not posted until on or about June 15, 2016.

Enclosed with this letter is an executed Verification from Securus attesting to the truthfulness and accuracy of these corrections.

Rosemary Chiavetta  
November 30, 2016  
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Thank you for your attention to this matter. Please do not hesitate to contact me with any question or concern.

Sincerely,

COZEN O'CONNOR

A handwritten signature in blue ink, appearing to read "David P. Zambito", is written over the printed name. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

By: David P. Zambito  
Counsel for *Securus Technologies, Inc.*

DPZ/kmg  
Enclosure

cc: Honorable Steven K. Haas  
Per Certificate of Service

**VERIFICATION**

I, Linda Nelson, Manager, Regulatory Affairs, Securus Technologies, Inc., hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 11-30-16

Linda Nelson

**CERTIFICATE OF SERVICE**  
**Docket No. C-2016-2547396**

I hereby certify that I have this day served a true copy of the foregoing correspondence re: Corrections to Securus Technologies, Inc.'s Answer and New Matter, upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**VIA FIRST CLASS MAIL:**

Kenneth Andre Dade  
EA-6297  
SCI Fayette  
P.O. Box 9999  
LaBelle, PA 15450-0999

DATED: November 30, 2016



David P. Zambito, Esquire  
Counsel for *Securus Technologies, Inc.*