



February 19, 2025

VIA EMAIL (ALPHONARNO@PA.GOV)

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The Honorable Alphonso Arnold III
Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120

Re: Richard Mercaldo v. Securus Technologies, LLC
Docket No. C-2024-3051564
Initial Telephonic Hearing

Dear Judge Arnold:

This firm represents Securus Technologies, LLC (“Securus”) in the above-referenced matter. In anticipation of the Initial Telephonic Hearing scheduled for February 26, 2025, Securus intends to present three documents at the hearing that have been pre-marked as follows:

- Securus Pre-Marked Confidential **Exhibit 1** – Answer and New Matter of Securus Technologies, LLC;
- Securus Pre-Marked Confidential **Exhibit 2** – Call Detail Report, as kept in the ordinary course of business by Securus; and
- Securus Pre-Marked Confidential **Exhibit 3** – Blocked Dialed Number, as kept in the ordinary course of business by Securus.

These three documents contain customer proprietary network information (“CPNI”), specifically individual phone numbers and calling data, which are protected under section 222 of the Communications Act of 1934, as amended, and accordingly Securus requests confidential treatment of these documents. These three documents contain sensitive and legally-protected information. Consequently, Securus requests that the Commission’s Secretary’s Bureau keep these three documents in a non-public folder.

All three pre-marked exhibits were included in the Answer and New Matter for Securus, which was previously sent to Complainant Richard Mercaldo (“Complainant”) on October 29, 2024, as reflected in the Certificate of Service for the Answer and New Matter. Complainant received the Answer and New Matter and responded to the New Matter.

Securus will present one witness, Ms. Cameshia Davis, Compliance Analyst, Regulatory Affairs for Securus. Ms. Davis will testify concerning Securus, the matters she verified to in the Answer and New Matter, Securus policies for phone blocks, and other information concerning Securus operations.

As stated in the New Matter, the Complainant does not have standing to assert a claim on behalf of another individual. The Complaint asserts that Complainant cannot reach a specific number and Securus will demonstrate that the owner of that number requested a block that would prevent the Complainant from reaching the owner of that phone number. Further, Complainant must prove that Securus violated the Public Utility Code or the Pennsylvania Public Utility Commission's regulations or orders, which Complainant will be unable to prove. Securus reserves the right to make a motion on the record for summary judgment or a directed verdict, as applicable or appropriate.

Counsel for Securus is available to respond to any questions in advance of the hearing. We appreciate Your Honor's time and attention to this matter. A copy of this letter and the pre-marked exhibits is being sent to Complainant.

Sincerely,

COZEN O'CONNOR



By: William Lesser

WL

cc: Richard Mercaldo, Complainant (See attached Certificate of Service)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Richard Mercaldo, ED-4296	:	
Complainant	:	
	:	
v.	:	Docket No. C-2024-3051564
	:	
Securus Technologies, LLC	:	
Respondent	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing letter and pre-marked exhibits upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party).

By First Class Mail

Richard Mercaldo, ED-4296
Smart Communications/PADOC
SCI Coal Township
PO Box 33028
St. Petersburg, FL 33733

Respectfully,

Cozen O'Connor



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Counsel for *Securus Technologies, LLC*

Date: February 19, 2025