



March 5, 2025

VIA E-FILING AND EMAIL (ALPHONARNO@PA.GOV)

William Lesser

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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
Follow-Up from Initial Telephonic Hearing

Dear Judge Arnold:

This firm represents Securus Technologies, LLC (“Securus”) in the above-referenced matter. Securus respectfully submits this letter, with copy to the Complainant, Mr. Richard Mercaldo, in order to address any remaining issues from the Initial Telephonic Hearing, which occurred on February 26, 2025.

Securus has prepared a response to Mr. Mercaldo’s question as to whether Mr. Frank Radons could reach out directly to Securus by letter to request that the phone block be removed. A recipient of calls from incarcerated individuals, such as Mr. Frank Radons, may send a letter to Securus to request to remove a phone block. This request by letter must include a phone bill that proves that he is the owner of the telephone number in question for which the block should be removed. Mr. Radons may indicate this by highlighting the number in his attached telephone bill that accompanies his request to remove the block. This is necessary to verify the identity and provide sufficient assurance that the request is being made by the owner of the telephone number in question. The letter should be addressed to: Securus Contact Center, PO Box 1109, Addison, TX 75001. Mr. Mercaldo is welcome to share this information with Mr. Radons for Mr. Radons to request that the phone block be removed.

Mr. Mercaldo requested that he be permitted to submit documents and letters concerning Mr. Radons and the phone block. While Mr. Mercaldo is welcome to submit these documents, and Securus intends to object to these documents and respond to them once they have been submitted, these documents would be irrelevant to this proceeding. Mr. Radons is not a party to this proceeding, he was not called as a witness to testify, and he has not intervened or made any request to Securus concerning the phone block that remains in place – as testified to by Securus witness Ms. Cameshia Davis. Even assuming, for the sake of argument, that Mr. Mercaldo has proof that Mr. Radons does not want there to be a phone block, this request must be made by Mr. Radons directly to Securus and Mr. Mercaldo cannot remove the phone block on his behalf.

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Counsel for Securus is available to respond to any questions, and we appreciate Your Honor's time and attention to this matter.

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 upon the following party, 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: March 5, 2025