

**Lance J.M. Steinhart, P.C.**  
1720 Windward Concourse  
Suite 115  
Alpharetta, Georgia 30005

Also Admitted in New York  
and Maryland

Telephone:(770) 232-9200  
Facsimile:(770) 232-9208  
Email: lsteinhart@telecomcounsel.com

May 3, 2010

**VIA ELECTRONIC FILING**  
**AND OVERNIGHT DELIVERY**

Honorable Jones, Chairman  
Attn: Sharla Dillon, Dockets  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-9021  
(615) 741-3939

filed electronically in docket office on 05/06/10

Re: Application of DSI-ITI, LLC and ITI Inmate Telephone, Inc. for Approval  
to Transfer Certain Assets of ITI Inmate Telephone, Inc. to DSI-ITI, LLC  
Docket No. 10-00053

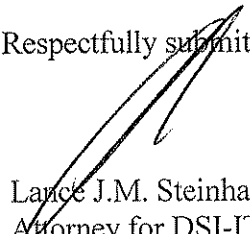
Dear Ms. Dillon:

Enclosed please find for filing an original and four (4) copies of the responses to  
Data Request No. 1 regarding the above-referenced Application. This filing has been  
electronically submitted on May 3, 2010.

I have also enclosed an extra copy of this letter to be date stamped and returned to  
me in the enclosed, self-addressed, postage prepaid envelope.

If you have any questions or if I may provide you with additional information,  
please do not hesitate to contact me.

Respectfully submitted,

  
Lance J.M. Steinhart  
Attorney for DSI-ITI, LLC

Enclosures

cc: David Silverman

Question No. 1      Have the applicants filed similar applications or notices in other states? If so, provide a listing of states and action taken.

**RESPONSE:** The applicants have filed similar applications in Georgia (pending), Arizona (pending), Pennsylvania (pledge of assets approved/transfer of assets pending), and Rhode Island (approved). The applicants have filed notices in Alabama, Arkansas, Florida, Illinois, Iowa, Kentucky, Maine, Maryland, Massachusetts, Michigan, New Hampshire, New Jersey, New Mexico, North Carolina, Texas and Wisconsin, all of which have been acknowledged, and no further action required.

Question No. 2      Have the applicants filed a similar application with the FCC? If so, list any action taken and the associated docket number. If a schedule to complete the review of your application has been established by the FCC, provide such with your response.

**RESPONSE:** Please see attached FCC Public Notice. The application was deemed eligible for stream-lined processing, and will be granted upon expiration of the public notice period.

Question No. 3      Provide the number of confinement facilities that ITI Inmate Telephone ("ITI") currently serves in Tennessee.

**RESPONSE:** ITI currently has 11 accounts (35 facilities) including the Tennessee Department of Correction.

Question No. 4      Provide a copy of the agreement governing the sell and transfer of assets to DSI-ITI, LLC from ITI.

**RESPONSE:** Attached please find one copy of Asset Purchase Agreement and Plan of Asset Transfer in a separate envelope marked "Confidential and Proprietary" requesting confidential treatment. The Company expects that this information will be restricted to counsel, agents and employees who are specifically assigned to this application by the Commission.



# PUBLIC NOTICE

FEDERAL COMMUNICATIONS COMMISSION  
445 12th STREET S.W.  
WASHINGTON D.C. 20554

News media information 202-418-0500  
Internet: <http://www.fcc.gov> (or <ftp.fcc.gov>)  
TTY (202) 418-2555

Report No. TEL-01426S

Friday April 30, 2010

## STREAMLINED INTERNATIONAL APPLICATIONS ACCEPTED FOR FILING SECTION 214 APPLICATIONS (47 C.F.R. § 63.18); SECTION 310(B)(4) REQUESTS

Unless otherwise specified, the following procedures apply to the applications listed below:

The international Section 214 applications listed below have been found, upon initial review, to be acceptable for filing and subject to the streamlined processing procedures set forth in Section 63.12 of the Commission's rules, 47 C.F.R. § 63.12. These applications are for authority under Section 214 of the Communications Act, 47 U.S.C. § 214, (a) to transfer control of an authorized carrier or to assign a carrier's existing authorization; and/or (b) to become a facilities-based international common carrier; and/or (c) to become a resale-based international common carrier.

Pursuant to Section 63.12 of the rules, these Section 214 applications will be granted 14 days after the date of this public notice (see 47 C.F.R. § 1.4 regarding computation of time), and the applicant may commence operations on the 15th day, unless the Commission has informed the applicant in writing, within 14 days after the date of this public notice, that the application, on further examination, has been deemed ineligible for streamlined processing.

Communications between outside parties and Commission staff concerning these applications are permitted subject to the Commission's rules for "permit-but-disclose proceedings." See 47 C.F.R. § 1.1206. An application can be removed from streamlined processing only in the sound discretion of Commission staff. The filing of comments or a petition to deny will not necessarily result in an application being deemed ineligible for streamlined processing.

The petitions for declaratory ruling listed below are for authority under Section 310(b)(4) of the Communications Act, 47 U.S.C. § 310(b)(4), to exceed the 25 percent foreign ownership benchmark applicable to common carrier radio licensees. The requested rulings will be granted 14 days after the date of this public notice, effective the next day, unless the application is formally opposed or the Commission has informed the applicant in writing, within 14 days of the date of this public notice, that the application, on further examination, has been deemed ineligible for streamlined processing. For this purpose, a formal opposition shall be sufficient only if it is received by the Commission and by the applicant within 14 days of the date of this public notice and its caption and text make it unmistakably clear that it is intended to be a formal opposition.

Copies of all applications listed here are available for public inspection in the FCC Office of Public Affairs Reference and Information Center, located in room CY-A257 at the Portals 2 building, 445 12th Street SW, Washington DC 20554. The center can be contacted at (202) 418-0270. People with Disabilities: To request materials in accessible formats for people with disabilities (braille, large print, electronic files, audio format), send an e-mail to [fcc504@fcc.gov](mailto:fcc504@fcc.gov) or call the Consumer & Governmental Affairs Bureau at 202-418-0530 (voice), 202-418-0432 (tty). All applications listed are subject to further consideration and review, and may be returned and/or dismissed if not found to be in accordance with the Commission's rules, regulations, and other requirements.

We request that comments on any of these applications refer to the application file number shown below.

ITC-214-20100409-00155	E	Telaris Enhanced Services, LLC
International Telecommunications Certificate		
Service(s): Global or Limited Global Resale Service		
Application for authority to provide resale service in accordance with section 63.18(e)(2) of the Commission's rules, 47 C.F.R. § 63.18(e)(2).		
ITC-214-20100416-00158	E	JTRK Enterprises LLC.
International Telecommunications Certificate		
Service(s): Global or Limited Global Resale Service		
Application for authority to provide resale service in accordance with section 63.18(e)(2) of the Commission's rules, 47 C.F.R. § 63.18(e)(2).		
ITC-214-20100416-00159	E	Edigen, Inc.
International Telecommunications Certificate		
Service(s): Global or Limited Global Facilities-Based Service, Global or Limited Global Resale Service		
Application for authority to provide facilities-based service in accordance with section 63.18(e)(1) of the Commission's rules, and also to provide resale service in accordance with section 63.18(e)(2) of the Commission's rules, 47 C.F.R. § 63.18(e)(1), (2).		
ITC-214-20100416-00161	E	IBC Telecom Corp.
International Telecommunications Certificate		
Service(s): Global or Limited Global Facilities-Based Service, Global or Limited Global Resale Service		
Application for authority to provide facilities-based service in accordance with section 63.18(e)(1) of the Commission's rules, and also to provide resale service in accordance with section 63.18(e)(2) of the Commission's rules, 47 C.F.R. § 63.18(e)(1), (2).		
ITC-214-20100419-00166	E	Qualitynet General Trading & Contracting
International Telecommunications Certificate		
Service(s): Global or Limited Global Facilities-Based Service, Global or Limited Global Resale Service		
Application for authority to provide facilities-based service in accordance with section 63.18(e)(1) of the Commission's rules, and also to provide resale service in accordance with section 63.18(e)(2) of the Commission's rules, 47 C.F.R. § 63.18(e)(1), (2).		
ITC-214-20100420-00164	E	Voyzze Communications, Inc.
International Telecommunications Certificate		
Service(s): Global or Limited Global Facilities-Based Service, Global or Limited Global Resale Service		
Application for authority to provide facilities-based service in accordance with section 63.18(e)(1) of the Commission's rules, and also to provide resale service in accordance with section 63.18(e)(2) of the Commission's rules, 47 C.F.R. § 63.18(e)(1), (2).		
ITC-214-20100421-00167	E	CONEQT INC.
International Telecommunications Certificate		
Service(s): Global or Limited Global Facilities-Based Service, Global or Limited Global Resale Service		
Application for authority to provide facilities-based service in accordance with section 63.18(e)(1) of the Commission's rules, and also to provide resale service in accordance with section 63.18(e)(2) of the Commission's rules, 47 C.F.R. § 63.18(e)(1), (2).		
ITC-214-20100422-00170	E	BEK Communications Cooperative
International Telecommunications Certificate		
Service(s): Global or Limited Global Resale Service		
Application for authority to provide resale service in accordance with section 63.18(e)(2) of the Commission's rules, 47 C.F.R. § 63.18(e)(2).		
ITC-214-20100423-00171	E	CONEXIONS LLC d/b/a Conexion Wireless
International Telecommunications Certificate		
Service(s): Global or Limited Global Facilities-Based Service, Global or Limited Global Resale Service		
Application for authority to provide facilities-based service in accordance with section 63.18(e)(1) of the Commission's rules, and also to provide resale service in accordance with section 63.18(e)(2) of the Commission's rules, 47 C.F.R. § 63.18(e)(1), (2).		

## Assignment

**Current Licensee:** Inmate Telephone Incorporated**FROM:** Inmate Telephone Incorporated**TO:** DSI-ITI, LLC

Application filed for consent to the assignment of certain assets held by Inmate Telephone Incorporated (ITI) to DSI-ITI, LLC (DSI-ITI). Pursuant to an asset purchase agreement dated March 16, 2010, ITI will assign all of its assets related to the provision of inmate operator services, including customer agreements and contracts, vendor agreements and contracts, and all advertising and promotional materials, to DSI-ITI. ITI will retain its international section 214 authorization, ITC-214-20081125-00514. DSI-ITI will provide service to its newly acquired customers pursuant to its international section 214 authorization, ITC-214-20100407-00149.

DSI-ITI is a wholly-owned direct subsidiary of Global Tel\*Link Corporation and an indirect wholly-owned subsidiary of GTEL Holding, LLC. GTEL Holding, LLC is owned by Veritas Capital Fund III, L.P. (VCP III LLC) (44%) and GS Direct L.L.C (16%). Veritas Capital Partners III, L.L.C. is the sole general partner of Veritas Capital Fund III, L.P. and Robert B. McKeon, a U.S. citizen, is the managing member of VCP III LLC. Credit Suisse Private Equity, Inc. holds an approximately 14% interest in GTEL Holding, LLC through its interest in VCP III LLC. The Goldman Sachs Group, Inc. owns 100% of GS Direct L.L.C and thus has a 16% indirect interest in GTEL Holding, LLC. RDV Corporation, which is owned by the DeVos family, holds an aggregate 12.5% interest in GTEL Holding, LLC; 6.42% directly through GT Group Investors, LLC; 3.14% directly through 804 Investors LLC; and, 2.95% indirectly through VCP III LLC. No other entity or individual holds 10 percent or greater direct or indirect ownership interest in GTEL Holding LLC or DSI-ITI.

**INFORMATIVE****ITC-214-20100325-00129**

TelePoint International Corporation

This application has been removed from Streamlined processing pursuant to Section 63.12(c)(3) of the Commission's rules.

**ITC-214-20100326-00127**

Guycom Telecom Corp

This application has been removed from Streamlined processing pursuant to Section 63.12(c)(3) of the Commission's rules.

**ITC-214-20100329-00136**

Forum Telecom, Inc.

This application has been removed from Streamlined processing pursuant to Section 63.12(c)(3) of the Commission's rules.

**ITC-214-20100331-00137**

Telax Voice Solutions, Inc.

This application has been removed from Streamlined processing pursuant to Section 63.12(c)(3) of the Commission's rules.

**REMINDERS:**

Applicants must certify that neither the applicant nor any party to the application is subject to a denial of federal benefits by federal and/or state courts under authority granted in 21 U.S.C. § 862. See 47 C.F.R. §§ 1.2001-.2003.

A current version of Section 63.09-.24 of the rules, and other related sections, is available at <http://www.fcc.gov/ib/pd/pf/telecomrules.html>.