

FILED

MAY 24 2017

**EXECUTIVE SECRETARY
G.P.S.C.**

**BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION**

**In the Matter of
Institutional Telecommunications Services**

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Docket No. 18870

**STAFF'S FIRST SET OF DATA REQUESTS TO
PAYTEL COMMUNICATIONS, INC.**

TO: Newton Galloway
Galloway & Lyndall, LLP
The Lewis-Mills House
406 North Hill Street
Griffin, Georgia 30223

COMES NOW the Staff of the Georgia Public Service Commission ("Commission") and, pursuant to the authority vested in it by the Commission pursuant to O.C.G.A. § 46-2-57, herein propounds the following interrogatories and requests for production of documents (collectively, "data requests"), to be answered under oath by designated representatives or agents of PayTel Communications, Inc.. Staff requests that a complete set of the responses and supporting documents be filed with the Commission's Executive Secretary in the manner set forth in Utility Rule 515-2-.04(4). Staff requests that an original and five (5) copies be filed with the Executive Secretary of the Commission. **Accompanied therewith shall be an electronic version of the filing, which shall be made on CD ROM containing an electronic version of its filing in Microsoft Word® for text documents or Excel® for spreadsheets.** Staff requests that responses to these Data Requests be submitted by **May 30, 2017**.

INSTRUCTIONS

1. If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- a) the privilege asserted and its basis.
- b) the nature of the information withheld;
- c) the subject matter of the document, except to the extent that you claim it is privileged.

2. **The answers provided should first restate the question asked and also provide the name of the Company employee(s) or agents responsible for compiling and providing the information contained in each answer.**

3. These data requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained.

4. If any data request cannot be responded to or answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.

5. These data requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these interrogatories subsequently become known.

**GEORGIA PUBLIC SERVICE COMMISSION STAFF FIRST SET OF
DATA REQUESTS TO PAYTEL COMMUNICATIONS, INC.**

- STF-1-1 Please answer the following questions in connection with PayTel's institutional telecommunications service to the Heard County Sheriff's Office:
- (a) Please provide the total number of minutes of use for institutional telecommunications calls broken down by month for the calendar years 2015 and 2016.
 - (b) Please provide the total commission paid broken down by month for the calendar years 2015 and 2016.
 - (c) Please provide the average daily population of the Heard County Sheriff's Office broken down by month for the calendar years 2015 and 2016.
- STF-1-2 Please answer the following questions in connection with PayTel's institutional telecommunications service to the Monroe County Sheriff's Office:
- (a) Please provide the total number of minutes of use for institutional telecommunications calls broken down by month for the calendar years 2015 and 2016.
 - (b) Please provide the total commission paid broken down by month for the calendar years 2015 and 2016.
 - (c) Please provide the average daily population of the Monroe County Sheriff's Office broken down by month for the calendar years 2015 and 2016.

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing **Staff's First Set of Data Requests to PayTel Communications, LLC** in the above-referenced docket was filed with the Commission's Executive Secretary, an electronic copy of same was served upon all parties and persons listed below via electronic mail, or unless otherwise indicated, as follows:

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This 24th day of May, 2017.

A handwritten signature in black ink, appearing to read "Daniel Walsh", written over a horizontal line.

Daniel Walsh
Senior Assistant Attorney General

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