

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
)	
Platinum Equity, LLC , Transferor,)	
Securus Technologies, Inc. , Licensee,)	
T-NETIX, Inc. , Licensee,)	
T-NETIX Telecommunications Services, Inc. ,)	
Licensee)	IB File Nos. ITC-T/C-2018_____
)	ITC-T/C-2018_____
and)	
)	
Platinum Equity Investment Holdings, LLC ,)	
Transferee)	
)	
Notification of <i>Pro Forma</i> Transfer of)	
Indirect Control of International Section 214)	
Authorizations Pursuant to Section 214 of)	
the Communications Act of 1934, as amended, and)	
Section 63.24 of the Commission’s Rules)	

NOTIFICATION OF PRO FORMA TRANSFER OF INDIRECT CONTROL

Securus Technologies, Inc. (“Securus”), T-NETIX, Inc. (“TNI”), T-NETIX Telecommunications Services, Inc. (“TNTS,” and together with Securus and TNI, collectively, “Licensees”), Platinum Equity, LLC (“PE LLC” or “Transferor”) and Platinum Equity Investment Holdings, LLC (“Transferee,” and, together with Transferor and the Licensees, collectively, the “Parties”), pursuant to Section 214 of the Communications Act of 1934, as amended (the “Act”), 47 U.S.C. § 214, and Section 63.24(f) of the Commission’s Rules, 47 C.F.R. § 63.24(f), notify the Commission of the *pro forma* transfer of indirect control of the Licensees that occurred on December 19, 2017 as a result of a corporate reorganization that resulted in the insertion of three indirect holding companies into the chain of ownership directly

below Transferor (the “Reorganization”). In support of this Notification, the Parties provide the following information:

II. DESCRIPTION OF THE PARTIES

A. Transferee and Transferor

Platinum Equity Investment Holdings, LLC is a Delaware limited liability company that was designated as the Transferee for purposes of this Notification and is one of the three entities inserted as part of the Reorganization described in below. PE LLC, which was designated as the Transferor for purposes of this Notification, is a Delaware limited liability company and the ultimate controller of Platinum Equity Capital Partners IV, L.P., a Delaware limited partnership (“Fund IV”), which is and will continue to be the ultimate majority owner of the Licensees. As set forth in Exhibit A, the Transferee is wholly-owned by Transferor and will continue to be so owned.

B. Licensees

The Licensees have been providing telecommunications service since the 1990s. Securus currently provides intrastate, interstate and international telecommunications services through the inmate calling services and public payphones that it provides to or at correctional facilities throughout the U.S. TNI previously provided telecommunications services to such facilities in various jurisdictions, but does not do so any longer. TNI’s wholly-owned subsidiary, TNTS currently provides international services pursuant to the international Section 214 authorization held by TNI solely in the State of Florida. The Licensees are and will continue to be wholly-owned indirect subsidiaries of SCRS Acquisition Corporation, a Delaware corporation (“SCRS Acquisition”). The Commission previously approved the transfer of indirect control of

Licensees to SCRS Acquisition and its parent companies on October 30, 2017.¹ For the pre- and post-Reorganization ownership structure charts of the Licensees, please see **Exhibit A**.

III. DESCRIPTION OF THE REORGANIZATION

This Notification is filed in connection with a corporate reorganization that resulted in the insertion of three indirect holding companies directly below the Transferor. Specifically, each of the following holding companies, none of which have management or other control over the Licensees, were inserted into the chain of indirect ownership directly below Transferor.

- 1) Platinum Equity Investment Holdings, LLC, a Delaware limited liability company;
- 2) Platinum Equity Investment Holdings IC (Cayman), LLC, a Delaware limited liability company; and
- 3) Platinum Equity InvestCo, L.P., a Cayman Islands limited partnership.

The Reorganization was a purely economic transaction undertaken by PE LLC (and certain related parties) involving the transfer of a minority of the economic rights in certain investment proceeds that may be generated by certain private equity investment funds sponsored by PE LLC (including, without limitation, Fund IV). The Reorganization had no effect on the *de jure* or *de facto* management or control of such private equity investment funds, their general partners or controllers, or that of PE LLC, in the Licensees. Again, pre- and post-Reorganization ownership structure charts for the Licensees are attached as **Exhibit A**.

¹See *In the Matter of Joint Application of Securus Investment Holdings, LLC, Securus Technologies, Inc., T-NETIX, Inc., and T-NETIX Telecommunications Services, Inc. and SCRS Acquisition Corporation for Grant of Authority Pursuant to Section 214 of the Communications Act of 1934, as Amended, and Sections 63.04 and 63.24 of the Commission's Rules to Transfer Indirect Ownership and Control of Licensees*, Memorandum Opinion and Order, WC Docket No. 17-126, FCC 17-141, 32 FCC Rcd 9564 (rel. Oct. 30, 2017).

As noted above, the Reorganization was completed on December 19, 2017. Due to an inadvertent and unintentional oversight, the Licensees were not made aware of the Reorganization until late April 2018. At that time, the Licensees were promptly advised by the undersigned regulatory counsel that the Reorganization required a *pro forma* notification under Section 63.24(f) of the Commission's rules within thirty days thereof and moved to file this Notification as quickly as possible after learning of the Reorganization. While the Parties regret the failure to timely notify the Commission of the *pro forma* transfer of control, the Reorganization did not affect the ongoing and safe operations of the facilities and services provided by the Licensees. Following the Reorganization, the Licensees have remained and will continue to remain technically, managerially, and financially qualified to provide the relevant services in accordance with their authorizations. The Reorganization had no adverse impact on the customers of the Licensees. The Licensees have continued to provide services to the same extent, at the same rates, and on the same terms and conditions as were in effect before the Reorganization. As the Reorganization occurred at the upper tier holding company level, the Reorganization has been wholly transparent to customers. The Licensees are and will continue to be indirect, wholly-owned subsidiaries of SCRS Acquisition. Moreover, Platinum Equity Capital Partners IV, L.P. is and will continue to be the ultimate majority owner of Licensees. The only change in the Licensees' indirect ownership was the insertion of the three holding companies near the very top of the ownership chain. The Reorganization had no effect on the *de jure* or *de facto* management or control over the Licensees. As a result, the Reorganization and resulting transfer of control were entirely *pro forma* in nature.

IV. INFORMATION REQUIRED BY SECTION 63.24(f)

Pursuant to Section 63.24(f)(2) of the Commission’s Rules, the Parties submit the following information requested in Section 63.18 (a)-(d) and (h) in support of this Notification:

(a) Name, address and telephone number of each Party:

Transferor:

Platinum Equity, LLC **FRN: 0027536671**
360 North Crescent Drive
South Building
Beverly Hills, CA 90210
310-712-1850

Licensees:

Securus Technologies, Inc. **FRN: 0006222319**
T-NETIX, Inc. **FRN: 0010421980**
T-NETIX Telecommunications Services, Inc. **FRN: 0005098199**
4000 International Pkwy.
Carrollton, TX 75007
972-277-0700

Transferee:

Platinum Equity Investment Holdings, LLC **FRN: 0027518083**
c/o Platinum Equity, LLC
360 North Crescent Drive
South Building
Beverly Hills, CA 90210
310-712-1850

(b) Jurisdiction of Organizations:

Transferor: Transferor is a limited liability company formed under the laws of Delaware.

Licensees: Securus is a corporation formed under the laws of Delaware.

TNI is a corporation formed under the laws of Delaware.

TNTS is a corporation formed under the laws of Texas.

Transferee: Transferee is a limited liability company formed under the laws of Delaware.

(c) **(Answer to Question 10)** Correspondence concerning this Notification should be

sent to:

For the Parties:

Paul C. Besozzi
Peter M. Bean
SQUIRE PATTON BOGGS (US) LLP
2550 M Street, N.W.
Washington, DC 20037
202-457-6000 (tel)
202-457-6315 (fax)
paul.besozzi@squirepb.com
peter.bean@squirepb.com

With a copy for Transferee and Transferor to:

Eva M. Kalawski
General Counsel and Secretary
c/o Platinum Equity, LLC
360 North Crescent Drive
South Building
Beverly Hills, California 90210
ekalawski@platinumequity.com

And a copy for Licensees to:

Mary Ann Sigler
Vice President & Treasurer
Securus Technologies, Inc.
c/o Platinum Equity, LLC
360 North Crescent Drive
South Building
Beverly Hills, California 90210
msigler@platinumequity.com

(d) Section 214 Authorizations

Transferor: Transferor does not hold international Section 214 authority.

Licensees: Securus holds international Section 214 authority to provide global or limited global facilities-based and resale service, granted in IB File No. ITC 214-19991115-00713.

TNI holds international Section 214 authority to provide global resale service, granted in IB File No. ITC-214-19980312-00185 (Old IB File No. ITC-98-225).

TNTS does not hold international Section 214 authority but operates under to the international Section 214 authority of TNI pursuant to 47 C.F.R. § 63.21(h).

Transferee: Transferee does not hold international Section 214 authority.

(h) (Answer to Questions 11 & 12) The following entities hold, directly or indirectly, a ten percent (10%) or greater interest² in Licensees following the Reorganization as calculated pursuant to the Commission’s ownership attribution rules for wireline and international telecommunications carriers:

Post-Reorganization Ownership of the Licensees

The following entity currently owns 100 percent (100%) of **TNTS**:

Name: T-NETIX, Inc. (“TNI”)
Address: 4000 International Pkwy.
Carrollton, TX 75007
Citizenship: U.S. (Delaware)
Principal Business: Telecommunications
% Interest: 100% (directly in TNTS)

The following entity currently owns 100 percent (100%) of **Securus** and **TNI**:

Name: Securus Technologies Holdings, LLC (“STH”)
Address: 4000 International Pkwy.
Carrollton, TX 75007
Citizenship: U.S. (Delaware)
Principal Business: Holding Company
% Interest: 100% (directly in Securus and TNI and, as to TNTS, indirectly as 100% owner of TNI)

The following entities currently own and will continue to own 100 percent (100%) of **STH**:

Name: Securus Holdings, LLC (“Holdings”)
Address: 4000 International Pkwy.
Carrollton, TX 75007
Citizenship: U.S. (Delaware)
Principal Business: Holding Company

² Unless otherwise indicated, the ownership interests provided herein represent both equity and voting interests.

% Interest: 100% (directly in STH)
Name: Connect Acquisition, LLC (“Connect”)
Address: 400 International Pkwy.
Carrollton, TX 75007
Citizenship: U.S. (Delaware)
Principal Business: Holding Company
% Interest: 100% (indirectly as 100% owner of Holdings)

Post-Reorganization Ownership of Connect

The following entities currently own or control a ten percent (10%) or greater direct or indirect interest in **Connect**:

Name: SCRS Acquisition Corporation (“SCRS AC”)
Address: c/o Platinum Equity, LLC
360 North Crescent Drive
South Building
Beverly Hills, California 90210
Citizenship: U.S. (Delaware)
Principal Business: Holding Company
% Interest: 100% (directly as 100% owner of Connect)

Name: SCRS Intermediate Holding II Corporation
 (“SCRS Int-Holding II”)
Address: c/o Platinum Equity, LLC
360 North Crescent Drive
South Building
Beverly Hills, California 90210
Citizenship: U.S. (Delaware)
Principal Business: Holding Company
% Interest: 100% (indirectly, as 100% owner of SCRS AC)

Name: SCRS Intermediate Holding Corporation
 (“SCRS Int-Holding”)
Address: c/o Platinum Equity, LLC
360 North Crescent Drive
South Building
Beverly Hills, California 90210
Citizenship: U.S. (Delaware)
Principal Business: Holding Company
% Interest: 100% (indirectly, as 100% owner of SCRS Int-Holding II)

Name: SCRS Holding Corporation (“SCRS Parent”)
Address: c/o Platinum Equity, LLC
360 North Crescent Drive

South Building
Beverly Hills, California 90210
Citizenship: U.S. (Delaware)
Principal Business: Holding Company
% Interest: 100% (indirectly, as 100% owner of SCRS Int-Holding)

Name: Platinum Equity Capital Partners IV, L.P. (“Fund IV”)
Address: c/o Platinum Equity, LLC
360 North Crescent Drive
South Building
Beverly Hills, California 90210
Citizenship: U.S. (Delaware)
Principal Business: Investments
% Interest: Approx. 68.32% of the equity interest and 93% voting interest (indirectly, as approximately 68.32% equity owner of SCRS Parent, with 93% of the voting shares)

No limited partner of Fund IV has a 10% or greater interest in SCRS Parent through Fund IV.

Name: Platinum Equity SCRS Co-Investors, LLC (“SCRS Co-Investors”)
Address: c/o Platinum Equity, LLC
360 North Crescent Drive
South Building
Beverly Hills, California 90210
Citizenship: U.S. (Delaware)
Principal Business: Investments
% Interest: Approx. 20.41% equity interest and 0% voting interest (indirectly, as approximately 20.41% equity owner of SCRS Parent)

SCRS Co-Investors holds no voting shares of SCRS Parent and is a passive investment vehicle for co-investors. None of the co-investors own, directly or indirectly, 10% or more of the equity of the Licensees.

Name: Platinum Equity Partners IV, L.P. (“Fund IV GP”)
Address: c/o Platinum Equity, LLC
360 North Crescent Drive
South Building
Beverly Hills, California 90210
Citizenship: U.S. (Delaware)
Principal Business: Investments
% Interest: Approx. 68.32% (indirectly, as the general partner of Fund IV)

No limited partner of Fund IV GP has a 10% or greater interest in SCRS Parent through Fund IV GP.

Name: Platinum Equity Partners IV, LLC (“PEP IV LLC”)
Address: c/o Platinum Equity, LLC
360 North Crescent Drive
South Building
Beverly Hills, California 90210
Citizenship: U.S. (Delaware)
Principal Business: Investments
% Interest: Approx. 68.32% (indirectly, as the general partner of Fund IV GP)

The sole manager of PEP IV LLC is Tom Gores, a U.S. citizen who can be reached through Platinum Equity, LLC, 360 North Crescent Drive, South Building, Beverly Hills, California 90210.

Name: Platinum Equity Investment Holdings IV, LLC
 (“PEIH IV”)
Address: c/o Platinum Equity, LLC
360 North Crescent Drive
South Building
Beverly Hills, California 90210
Citizenship: U.S. (Delaware)
Principal Business: Investments
% Interest: Approx. 68.32% (indirectly, as the sole member of PEP IV LLC)

The sole manager of PEIH IV is Tom Gores.

Name: Platinum Equity InvestCo, L.P. (“InvestCo”)
Address: c/o Platinum Equity, LLC
360 North Crescent Drive
South Building
Beverly Hills, California 90210
Citizenship: Cayman Islands
Principal Business: Investment Holding Company
% Interest: Approx. 68.32% (indirectly, as approximately 68.32% owner of PEIH IV)

No general or limited partner of InvestCo has a 10% or greater economic interest in SCRS Parent through InvestCo.

Name: Platinum Equity Investment Holdings IC (Cayman), LLC
 (“Holdings IC”)

Address: c/o Platinum Equity, LLC
360 North Crescent Drive
South Building
Beverly Hills, California 90210
Citizenship: U.S. (Delaware)
Principal Business: Investment Holding Company
% Interest: Approx. 68.32% (indirectly, as the general partner of InvestCo)

The sole manager of Holdings IC is Mary Ann Sigler, Chief Financial Officer of PE LLC.

Name: Platinum Equity Investment Holdings, LLC (“PEIH”)
Address: c/o Platinum Equity, LLC
360 North Crescent Drive
South Building
Beverly Hills, California 90210
Citizenship: U.S. (Delaware)
Principal Business: Holding Company
% Interest: Approx. 68.32% (indirectly, as approximately 68.32% owner of Holdings IC).

The sole manager of PEIH is Tom Gores.

Name: Platinum Equity, LLC (“PE LLC”)
Address: 360 North Crescent Drive
South Building
Beverly Hills, California 90210
Citizenship: U.S. (Delaware)
Principal Business: Investments
% Interest: Approx. 68.32% (indirectly, as approximately 68,32% owner of PEIH)

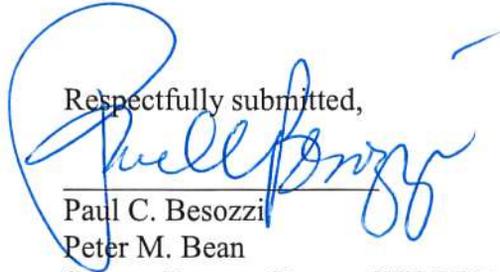
The sole manager of PE LLC is Tom Gores. The sole member of PE LLC is the Gores Trust dated January 26, 1999, as amended. Tom Gores and Holly Gores, U.S. citizens, are the trustees of the Gores Trust.

To the Transferee’s knowledge, no other person or entity, directly or indirectly, owns or controls a ten percent (10%) or greater interest in Transferee.

Transferee does not have any interlocking directorates with a foreign carrier.

Pursuant to Section 63.24(f)(2)(ii) of the Commission's Rules and the certification in **Exhibit B**, the Parties certify that the Reorganization and resulting transfer of control was *pro forma* in nature and that, together with all previous *pro forma* transactions, did not result in a change in the actual controlling party.

Respectfully submitted,



Paul C. Besozzi

Peter M. Bean

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paul.besozzi@squirepb.com

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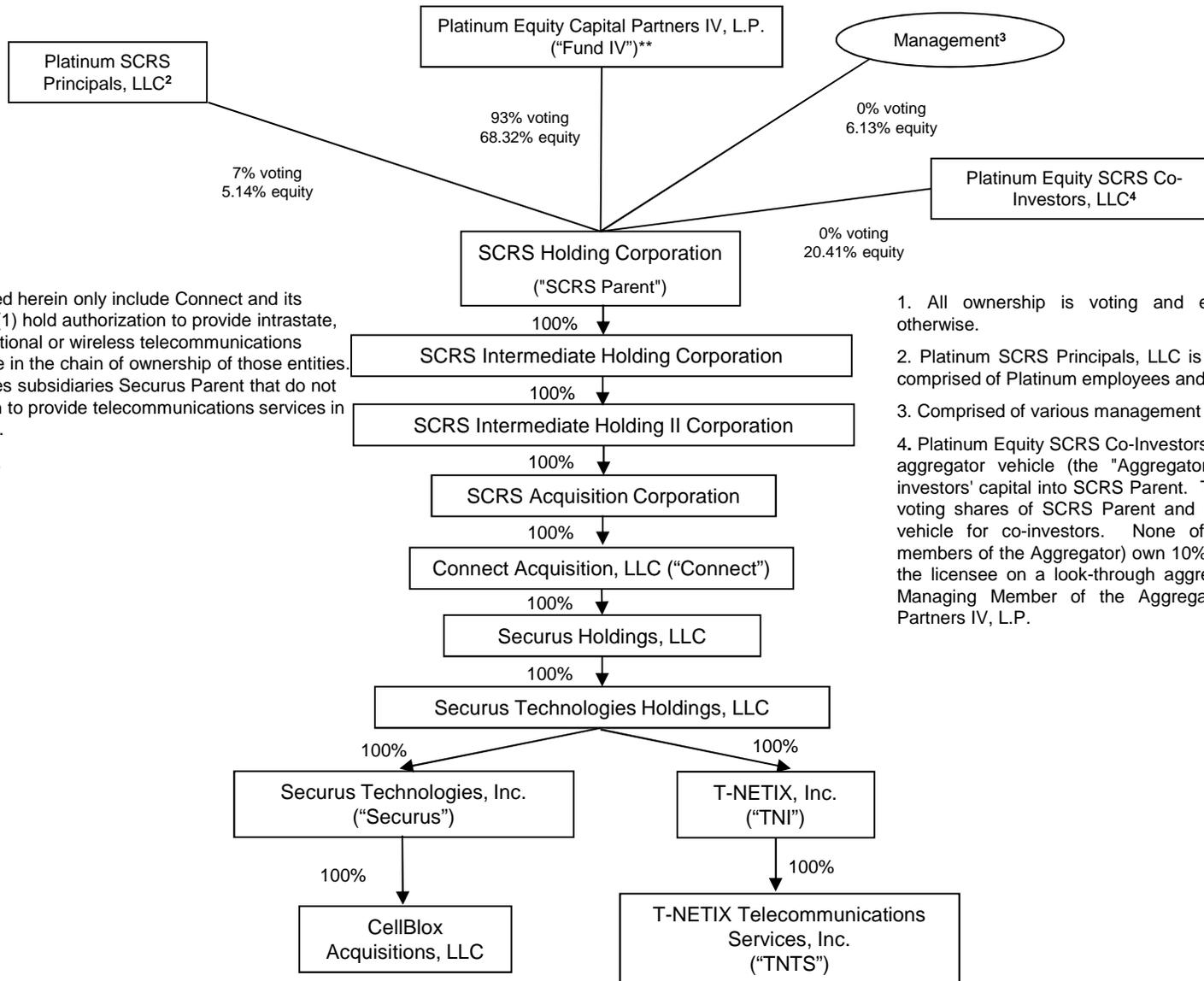
Counsel to the Parties

Dated: May 16, 2018

Exhibit A

Diagrams of the Pre- and Post-Reorganization Ownership Structures

Pre- and Post-Reorganization Ownership Structure of Licensees*



* The entities listed herein only include Connect and its subsidiaries that (1) hold authorization to provide intrastate, interstate, international or wireless telecommunications services or (2) are in the chain of ownership of those entities. The chart excludes subsidiaries Securus Parent that do not hold authorization to provide telecommunications services in the United States.

** See pages 2-3.

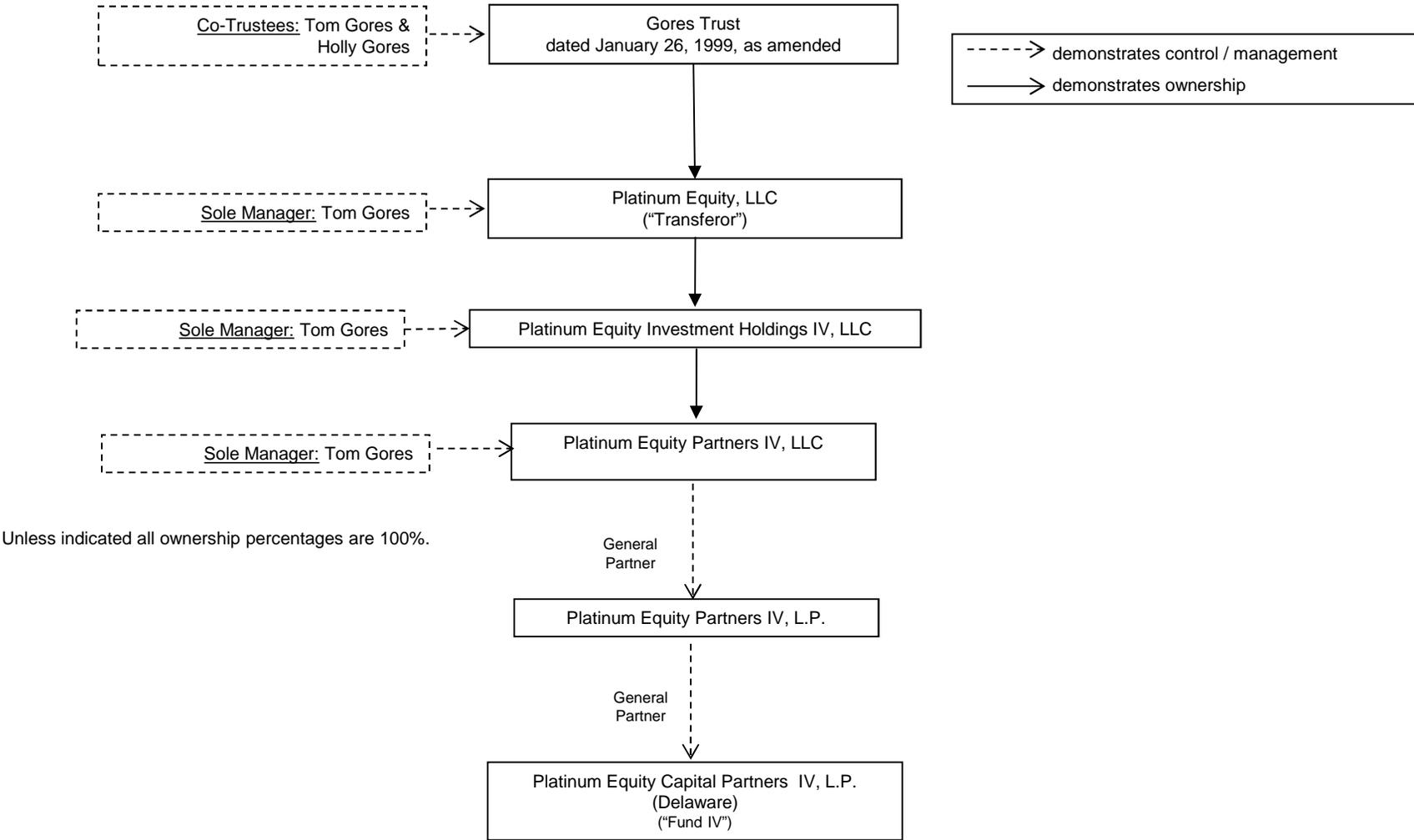
1. All ownership is voting and equity unless indicated otherwise.

2. Platinum SCRS Principals, LLC is a co-investment vehicle comprised of Platinum employees and their friends and family.

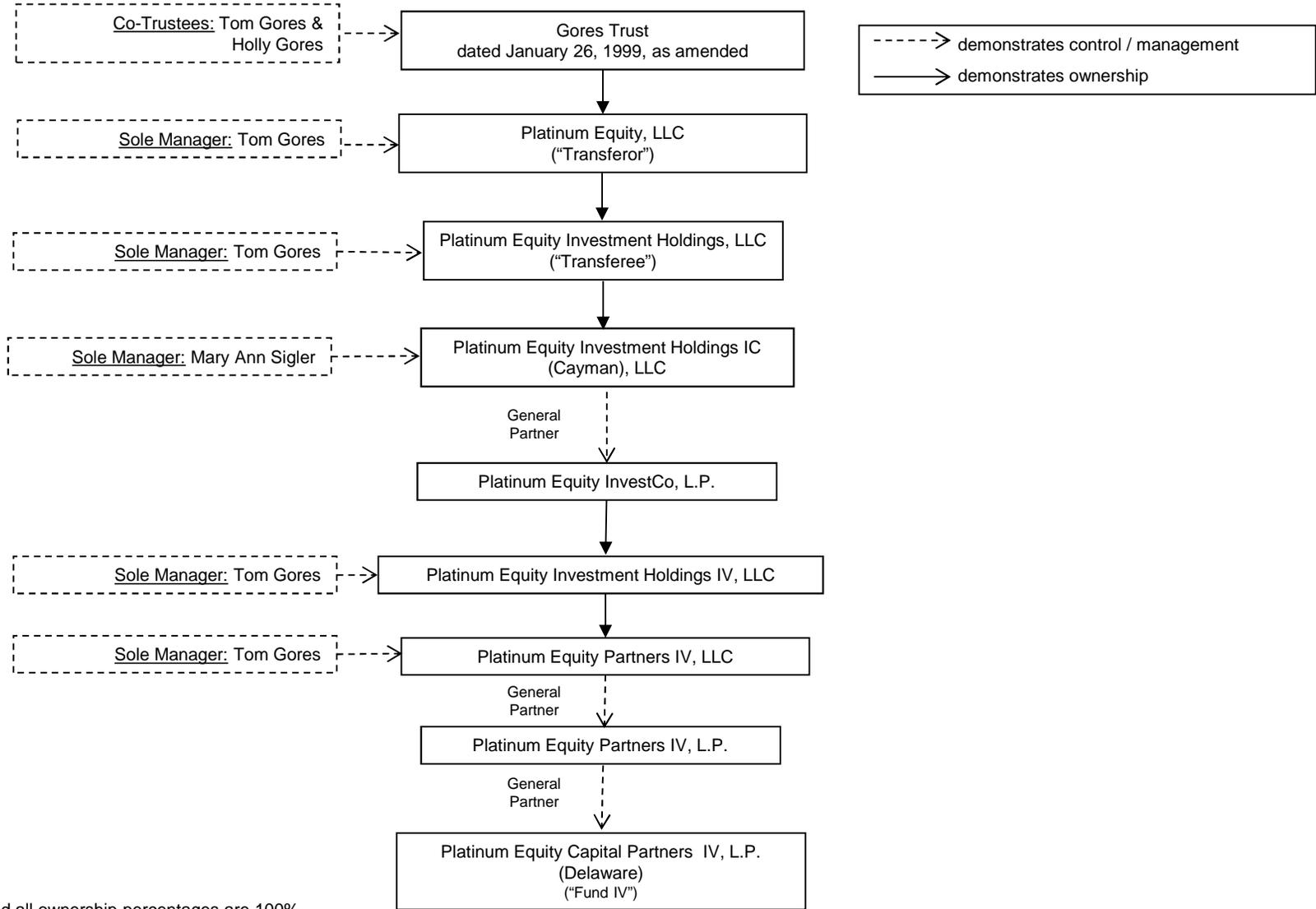
3. Comprised of various management individuals of Securus.

4. Platinum Equity SCRS Co-Investors, LLC is a co-investment aggregator vehicle (the "Aggregator") that contributed co-investors' capital into SCRS Parent. The Aggregator holds no voting shares of SCRS Parent and is a passive investment vehicle for co-investors. None of the co-investors (i.e., members of the Aggregator) own 10% or more of the equity of the licensee on a look-through aggregate basis. The Senior Managing Member of the Aggregator is Platinum Equity Partners IV, L.P.

Pre-Reorganization Ownership Structure of Fund IV



Post-Reorganization Ownership Structure of Fund IV



Unless indicated all ownership percentages are 100%.

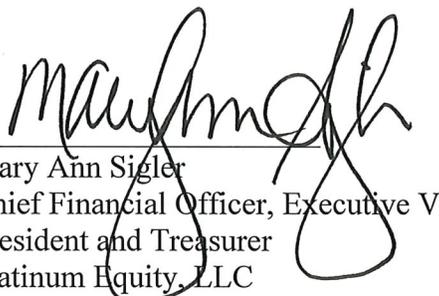
Exhibit B

Certification

Certification

I, Mary Ann Sigler, am Chief Financial Officer, Executive Vice President and Treasurer of Platinum Equity, LLC and Vice President and Treasurer of Securus Technologies, Inc., T-NETIX, Inc., and T-NETIX Telecommunications Services, Inc. (collectively, the "Companies") and as such, I am authorized to execute this certification on behalf of the Companies and Platinum Equity, LLC and its direct and indirect subsidiaries, including Platinum Equity Investment Holdings, LLC, Platinum Equity Investment Holdings IC (Cayman), LLC, and Platinum Equity InvestCo, L.P. In accordance with 47 C.F.R. § 63.24(f)(ii), I hereby certify that the foregoing notification of *pro forma* transfer of indirect control was prepared under my direction, supervision and control and that the factual statements and representations made therein by and concerning Platinum Equity, LLC and its direct and indirect subsidiaries are true and correct to the best of my knowledge, information, and belief. I further certify that the transfer of control was *pro forma* in nature as defined in 47 C.F.R. § 63.24(d) and, taken together with all previous *pro forma* transactions, did not result in a change in the actual controlling party of the Licensees.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 15th day of May, 2018.



 Mary Ann Sigler
Chief Financial Officer, Executive Vice
President and Treasurer
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