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* ADMITTED IN DC ONLY

July 30, 2020

Via ECFS and IBFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 20-218
File No. ITC-ASG-20200708-00112

Dear Secretary Dortch:

On July 8, 2020, Global Tel*Link Corporation (“GTL”) and Legacy Long Distance International, Inc. d/b/a Legacy Inmate Communications (“Legacy”) (collectively, the “Applicants”) filed a Joint Application seeking Commission approval to assign and/or transfer control of certain Legacy assets to GTL (the “Transaction”). Applicants seek to supplement the Joint Application as set forth herein.

The Joint Application states that American Securities Partners VI, LP (“ASP VI”) is a private equity fund managed by American Securities LLC (“AmSec”), an investment advisor registered with the Securities and Exchange Commission. The statement in the Joint Application that ASP VI is “managed” by AmSec was intended to mean that AmSec is an investment advisor for ASP VI. AmSec does not have any ownership interest or day-to-day management role in GTL, ASP VI, or any of the other entities listed in the Joint Application.

AmSec is a New York limited liability company, and the following individuals oversee the day-to-day management of AmSec, each of which is a U.S. citizen: (1) Michael G. Fisch, Chief Executive Officer; (2) Joseph A. Domonkos, Chief Financial Officer; (3) David J. Maue, Chief Administrative Officer; (4) Eric L. Schondorf, General Counsel; and (5) Jeremy B. Maco, Chief

Compliance Officer. The address for AmSec and these individuals is 299 Park Avenue, 34th Floor, New York, NY 10171.

The general partner of ASP VI is American Securities Associates VI, LLC ("ASA"), a Delaware limited liability company located at 299 Park Avenue, 34th Floor, New York, NY 10171. ASA is the entity that has control over ASP VI, and ASA also holds 1% of ASP VI. As stated in the Joint Application, no limited partner in ASP VI owns a 10% or greater interest in ASP VI. No other person or entity holds a 10% or greater direct or indirect ownership interest in ASP VI.

Michael G. Fisch and David L. Horing, both U.S. citizens, are the managing members of ASA. The following individuals each hold a 10% or more (but less than 50%) interest in ASA: Michael G. Fisch, Paul Rossetti, David L. Horing, and Matthew F. LeBaron, each of which is a U.S. citizen. The address for these individuals is c/o American Securities LLC, 299 Park Avenue, 34th Floor, New York, NY 10171.

To GTL's knowledge and other than as set forth herein and in the Joint Application, no other person or entity, directly or indirectly, will own or control a 10% or greater interest in GTL after consummation of the Transaction.

If you have any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

/s/ Chérie R. Kiser

Chérie R. Kiser
Angela F. Collins

Counsel for Global Tel*Link Corporation

cc: Brian Hill, Chief Executive Officer
Legacy Long Distance International, Inc. d/b/a Legacy Inmate Communications