

STATE OF IOWA
DEPARTMENT OF COMMERCE
IOWA UTILITIES BOARD

IN RE:

SECURUS TECHNOLOGIES, INC.

DOCKET NO. TF-2019-0033

**AFFIDAVIT IN SUPPORT OF
APPLICATION FOR CONFIDENTIAL
TREATMENT OF SECURUS
TECHNOLOGIES, INC.**

I, Michael Lozich, under oath state that I am the Senior Corporate Counsel and Director of Regulatory Affairs for Securus Technologies, Inc. (“Securus”). In that role, I supervise and direct activities with respect to federal and state regulatory compliance and reporting, state regulatory tariff filings, and the handling of complaints from federal and state regulatory agencies.

1. I have knowledge that the information contained in Securus’ response to the Board’s fourth request for information set forth in its order in the above docket requiring additional information dated May 24, 2019, includes information that Securus considers to be proprietary and sensitive business information and which constitutes trade secret information under Iowa Code section 550.2(4).
2. The information contained in Securus’ response to the Board’s fourth request for information constitutes confidential trade secret information under Iowa Code section 550.2(4) for the following reasons.

- a. The information contained in Securus' response to the Board's fourth request for information is highly sensitive and is not generally known to or readily ascertainable by competitors or the public.
 - b. Securus derives independent economic value from keeping the information contained in Securus' response to the Board's fourth request for information confidential in that its competitors could more readily ascertain or strategize regarding its business model with access to the information. Because the information pertains to Securus' strategy in competitive bidding situations, release of the information would cause significant economic harm to Securus in submitting competitive bids.
 - c. Securus makes reasonable efforts to maintain the secrecy of the information contained in Securus' response to the Board's fourth request for information.
3. Securus believes public release of the information contained in Securus' response to the Board's fourth request for information would substantially injure its economic and business interests.
4. Securus believes the public release of the information in the information contained in Securus' response to the Board's fourth request for information to the public would give advantage to competitors.
5. Securus believes the public release of the information contained in Securus' response to the Board's fourth request for information would serve no public purpose.

The information provided in this Affidavit is true and correct to the best of my knowledge.

/s/ Michael Lozich

Michael Lozich