

REDACTED – FOR PUBLIC INSPECTION

March 1, 2019

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

*Re: Inmate Calling Services Proceeding – WC Docket No. 12-375*

Dear Ms. Dortch:

Pay Tel Communications, Inc. (“Pay Tel”), through counsel, submits its response to the Commission’s Mandatory Data Collection pursuant to the requirements of *2015 ICS Order*<sup>1</sup> and in compliance with the Commission’s Public Notices regarding the same.<sup>2</sup>

The filing consists of three components: (1) the completed Mandatory Data Collection (FCC Form 2300) in .pdf format; (2) a Description & Justification corresponding to Pay Tel’s data responses; and (3) Pay Tel’s audited financial statements for 2014-2017 and compiled financial statement for 2018.<sup>3</sup>

In accordance with the Wireline Competition Bureau’s Public Notice in WC Docket No. 12-375 dated February 14, 2019 (DA 19-85), and using the procedures specified in the Protective Order issued by the Bureau on December 19, 2013,<sup>4</sup> redacted, public versions of the above-referenced filings are being submitted with this letter. The unredacted filings contains confidential

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<sup>1</sup> *Rates for Interstate Inmate Calling Services*, WC Docket No. 12-375, Second Report and Order and Third Further Notice of Proposed Rulemaking, 30 FCC Rcd 12763, at 12862-64, 21908 (2015) (“*2015 ICS Order*”).

<sup>2</sup> *Wireline Competition Bureau Announces Due Dates for Inmate Calling Services Information Collections and Consumer Disclosure Requirements*, WC Docket No. 12-375, Public Notice, 32 FCC Rcd 1522 (WCB 2017); and *Wireline Competition Bureau Reminds Providers of Inmate Calling Services of the March 1, 2019 Deadline for Data Collection Responses*, WC Docket No. 12-375, Public Notice, DA 19-85 (rel. Feb. 14, 2019).

<sup>3</sup> The audited 2018 financial statement is not yet available.

<sup>4</sup> *See Rates for Interstate Inmate Calling Services*, WC Docket No. 12-375, Protective Order, 28 FCC Rcd 16954 (WCB 2013).

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commercial, financial, and technical information disclosure of which will likely would cause substantial competitive and financial harm to Pay Tel. Accordingly, a copy of the confidential versions is being submitted separately to the Commission under confidential seal, along with a native file copy of the Mandatory Data Collection form.

Should any questions arise in connection with this filing, please do not hesitate to contact this office.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Marcus W. Trathen", with a horizontal line extending to the right.

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Marcus W. Trathen  
Counsel to Pay Tel Communications, Inc.

cc: Vincent Townsend (w/encl.)