

May 28, 2019
Via ECFS Filing

REDACTED – FOR PUBLIC INSPECTION

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
9050 Junction Drive
Annapolis Junction, MD 20701

RE: Inmate Calling Solutions, LLC
WC Docket No. 12-375, *In the Matter of Inmate Calling Services*;
Amended Inmate Calling Services Mandatory Data Collection

Pursuant to Federal Communications Commission's Second Report and Order and Third Further Notice of Proposed Rulemaking ("FNPRM") in the Matter of Interstate Inmate Calling Services¹ ("ICS") and its Order DA 17-209 released on March 2, 2017, Inmate Calling Solutions, LLC ("ICSolutions") hereby submits its amended second one-time Mandatory Data Collection originally due March 1, 2019. This data is being submitted pursuant to the Protective Order issued in the above referenced docket number². ICSolutions herein submits a redacted version of its Description and Justification and ICS data electronically via ECFS.

Due to unforeseeable changes in critical personnel at the time of the original filing, this amendment revises certain data included in the original submission.

ICSolutions respectfully requests the Commission withhold from public inspection and grant confidential treatment of its FCC Form 2300 and Description and Justification, pursuant to 47 C.F.R. §§ 0.459(b)(4)-(6).

Public release of this information could significantly damage ICSolutions' competitive position by divulging the Company's proprietary Description and Justification and ICS data. The Description and Justification represents a disclosure of internal business processes that could help a competitor understand ICSolutions' management of its operating costs and thereby adversely affect its competitive advantage. Competitors could use ICSolutions' ICS data to their advantage when bidding on contracts, since this information makes it easy to estimate the Company's revenues and know its consumer purchasing statistics.

¹ See *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 (2015) (*Inmate Calling Second Report and Order and Third FNPRM*).

² See *Rates for Interstate Inmate Calling Services*, Protective Order, WC Docket No. 12-375, 28 FCC Rcd 16954 (Wireline Comp. Bur. 2013) (*Protective Order*).

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Allowing this information to be in the public domain would put ICSolutions at a disadvantage when attempting to obtain new business and continue providing current service. As ICSolutions is in a competitive market allowing its competitors access to this data would damage its position in the market and future potential growth.

A confidential version of ICSolutions' amended second one-time Mandatory Data Collection has also been emailed to Gil Strobel of the Wireline Competition Bureau at gil.strobel@fcc.gov and filed with the Commission via Overnight Mail.

Sincerely,

/s/Sharon R. Warren

Sharon R. Warren
Consultant

cc: Ken Dawson (via email) - ICS
tms: FCx1903

SW/mp