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*ADMITTED IN DC ONLY

August 30, 2017

VIA ECFS

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

Re: WC Docket No. 12-375 - Global Tel*Link Corporation - Written *Ex Parte* Presentation

Dear Secretary Dortch:

Global Tel*Link Corporation (“GTL”),¹ respectfully submits this response to the written *ex parte* presentation filed with the Federal Communications Commission (“Commission”) on August 23, 2017 by the Human Rights Defense Center (“HRDC”) in the above-referenced matter addressing the resolution of a civil action filed by the State of Mississippi against GTL.

GTL has actively sought to work with HRDC and similar organizations for the benefit of prison inmates and their families, especially with respect to inmate education and the promotion of communication between inmates and their family and friends, and the community at-large. As such, GTL feels strongly that it is important to correct the inaccuracies contained in HRDC’s August 23rd *ex parte* submission, which reflects a fundamental misunderstanding of the facts regarding GTL’s settlement with the State of Mississippi.

¹ This filing is being submitted by GTL on behalf of itself and its wholly owned subsidiaries that also provide inmate calling services: DSI-ITI, LLC, Public Communications Services, Inc., and Value-Added Communications, Inc.

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HRDC incorrectly asserts that “by potentially paying increased prison telephone rates to cover bribes, the cost of this settlement, and then increased rates to cover the settlement, Mississippi prisoners and their families are being triply victimized while GTL continues to be rewarded as a state contractor.” This could not be further from the truth.

- **The Case:** GTL was one of 15 companies involved in civil lawsuits brought by the State of Mississippi following the conviction of Christopher Epps, Commissioner of the Mississippi Department of Corrections, for his extortion of numerous consultants. Only one of those consultants was engaged as a consultant by GTL and he testified in a related federal proceeding that GTL was not involved with or aware of his actions. *See* October 5, 2015 *Ex Parte* Response of GTL to HRDC October 4, 2015 letter to Chairman Wheeler.
- **No Bribe:** GTL’s contract in Mississippi was awarded by an independent state agency, the Mississippi Department of Information Technology Services, which was unaffected by the corruption of Mr. Epps. Testimony in related federal hearings affirmed that GTL’s contract was legitimately awarded by this independent state agency. *Id.*
- **No Guilt:** The settlement acknowledges that GTL denies any involvement in any wrongdoing. Mississippi Attorney General Jim Hood said: “As a company that continues to contract with the State, Global Tel*Link quickly approached our office seeking settlement after the Epps scandal. Due to their cooperation, we have now resolved this matter.” GTL remains a contractor with the State of Mississippi and recently was given a six month extension of its inmate calling service (“ICS”) contract.
- **No Link to Rates:** Contrary to HRDC’s assertions, there will be no increases in the applicable ICS rates as a result of this settlement, and there is no evidence to support the specious claim that GTL ever charged “increased prison telephone rates to cover bribes.”

Like many other corporations involved in similar civil suits, GTL chose to settle. On the day of the settlement, GTL’s CEO Brian Oliver said: “We have always acted with integrity. . . . We can spend the next three years focused on innovation or litigation. We choose innovation.”

The most exciting innovations are GTL’s leadership in tablet technology and education. Tablet technology can provide new avenues of communication for inmates and their families. Music and other cultural offerings have proven to be productive and welcomed resources to prison populations. And through online instructional courses, tablet technology brings education to more inmates than ever before. That education provides a path to success in civilian life.

Pursuant to Section 1.1206(b) of the FCC’s rules, a copy of this notice is being filed in the appropriate docket.

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Please contact us if you have any questions regarding this matter.

Respectfully submitted,

/s/ Chérie R. Kiser

Chérie R. Kiser

Counsel for Global Tel*Link Corporation

cc (via e-mail): Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O’Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel