

Arent Fox

October 28, 2014

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Stephanie A. Joyce

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Re: Notice of Permitted *Ex Parte* Meeting, WC Docket No. 12-375

Dear Ms. Dortch:

On October 24, 2014, Securus Technologies, Inc. (“Securus”), represented by Richard Smith, Chief Executive Officer, Dennis Reinhold, Vice President and General Counsel, and the undersigned counsel, met with Amy Bender, Legal Advisor to Commissioner Michael O’Rielly, and intern Danielle Thumann.

Securus first discussed the Commissioner’s remarks during the October 17 Open Meeting regarding whether intra-facility competition would resolve the issues in this proceeding. Securus explained that the capital expenditure, even for a centralized, IP-based inmate calling system, would deter Inmate Calling Services (“ICS”) providers from entering a multi-provider arrangement due to the uncertainty of recouping costs. In addition, Mr. Smith noted that correctional authorities with whom he has spoken would not welcome such arrangements due to the security concerns inherent in having more than one ICS carrier responsible for securing, monitoring, and recording calls. A multi-provider system in itself will not ensure that ICS rates decrease, because site commissions remain part of the ICS landscape and continue to represent the largest component of ICS costs. Ms. Bender was provided with the attached handout.

Securus then discussed the issue of site commissions as being a decision that that FCC must make and with which ICS carriers then must comply. The attached handout was provided. The funds accrued via site commissions go toward valuable programs that should remain in place. In order to achieve that result, if the FCC determines that site commissions must not be recouped in ICS rates, a reasonable transition period should be adopted in order to enable facilities to fulfill existing budgets and then find alternative sources of funding. Securus has spent considerable resources to ensure that correctional facilities do not lose that funding altogether; in the last 10 years, Securus has spent approximately \$10 Million in this effort.

Securus also emphasized the importance of having secure ICS platforms. The present system of competitive bidding (59 ICS providers presently participate in public bids), from which a

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contract with one ICS provider is formed for a term of years, has enabled the industry to rigorously pursue research and development of ever-stronger ICS security features. Securus also has developed over 650 security features on which its facility customers rely. The forthcoming rules should ensure that providers such as Securus can continue to develop such features and recoup the costs of their development and deployment.

Securus provided Ms. Bender with a folder containing the attached descriptive materials.

This disclosure is made in compliance with 47 C.F.R. § 1.1206(a)(1).

Please do not hesitate to contact me with any questions: 202.857.6081.

Sincerely,

s/Stephanie A. Joyce

Counsel to Securus Technologies, Inc.

Attachments

Cc: Amy Bender, Legal Advisor to Commissioner O’Rielly
Pamela Arluk, Acting Chief, Pricing Policy Division, Wireline Competition Bureau
Lynne Engledow, Acting Deputy Division Chief, Pricing Policy Division, Wireline
Competition Bureau
All via electronic mail

Permitting Telephone Competition Within the Facilities with Inmate Choice Will Not Work

- Competition **DOES EXIST** for the right to install inmate telephone systems in facilities = **Good**;
- **Commission Price Cap Plan will drive inmate calling rates lower and quality/quantity of products up = Good = Competition;**
- Sole sourcing to a single provider after an initial competitive process is the norm in government and business;
- Multiple telephone providers within a single facility cannot be administratively maintained because:
 - 59 Competitors
 - 59 Calling Platforms
 - 59 ways to analyze information
 - Increase in corrections administration time by 59X
 - **Calls will not be analyzed**
 - **Witnesses, victims, inmates, judges, corrections officers, family members are at risk of harassment, injury, and even death if calls are not analyzed through a single provider's platform**
 - **All corrections officials agree, have to use a single calling platform.**

Permitting telephone competition within the jail/prison system with inmate choice will not work and citizens will be at risk of harassment, injury, and even death as a result.

THE SECURUS™ TECHNOLOGY PATHWAY

Our goal of being our customers' "Most Valued Partner" involves much more than simply providing leading-edge applications and first-class customer service. We understand that a partnership is an ongoing relationship, not a static one-time sale.

In order to achieve our goal, we have built our applications around a next generation architecture. This architecture allows us to place partner facilities on a technological pathway that provides interoperable applications that work seamlessly together and are easily upgradable with each technological advancement.

The net effect... our customers work more efficiently... solve more crimes... rehabilitate more detainees... and retain more staff than they have ever done before.

SCA TECHNOLOGY

"The Engine That Makes It All Happen"

From call management to jail management, focused applications to end-user services, all our offerings utilize the power of our SCA-Secure Connect Architecture™, the industry's most technologically advanced architecture, to operate at standards well above the industry norm.

SCA is a complex system that took years of development to complete. Its intricate patented structure is comprised of a robust data repository housing multiple data marts each holding billions of bytes of stored information gathered from multiple sources.

Accessing this vast information network are the individual applications each carefully crafted to service the specific requirements of its users.

SCA's intelligent retrieval system retrieves all this information and processes all user requests through a unique, cross application, cross data-mart retrieval process that provides a depth and richness of information that is impossible to produce from non-integrated applications.

To the user, SCA, through its proprietary queuing process, provides a seamless interoperable environment amongst all applications and data repositories.

SCN - SECURE CONNECT NETWORK™

"The Network It All Runs On"

As one of the only netcentric, VoIP, digital transmitted systems in the industry, SCN assures that all calls utilize a digitally "clean" transmission flow.

"Clean" digital transmission is not only a more efficient means of transport, assuring more calls are completed (and operational efficiencies achieved), but also increases the effectiveness of investigative and fraud tracking programs such as 3-way call detection, word search applications and voice biometric identification systems.

This netcentric system allows complete on-the-fly turn on/turn off flexibility for most system features; 24-7 offsite monitoring; immediate nationwide system upgrades and repairs from one central location; no fear of losing data because of local disasters such as hurricanes, floods, fires, localized security breaches.

S-GATE USER INTERFACE

"The User Interface That Makes It So Simple"

Although the system architecture is one of the most complex in the industry, the beauty of SCA is the way a user harnesses all this new-found power. Access to all information requests are seamlessly provided through our S-GATE™ user interface. This ingenious, simple to use portal, provides single point access to all programs, applications and services. The logically built design provides the cockpit from which a facility runs its entire operation.

Need to review your revenue for the week, book in a new detainee on your JMS, change the phone settings, in a specific location on your CMS, access your commissary system to track inventory? It's all there in one tidy, easy to use interface. The S-GATE user interface even provides seamless access to third party partner applications such as background checks and pawn shop activity.

SCA's Secure Connect Architecture and intelligent retrieval system, data repository-data marts and the S-GATE user interface; all built to provide you with the first, simple to use, single point-of-access family of integrated applications. Allowing you to function more efficiently, more intelligently, with more information, than any other system.



SECURUS

SUPPORT-ME-NOW![™] CUSTOMER SUPPORT PROGRAMS

The value of any application is only as good as its support, and SECURUS provides one of the most inclusive packages of customer support services in the industry. From IT Support to Customer Care In-House Technical Support to In-Field Technical Assistance, SECURUS takes its responsibility to service the customer seriously. Superior Support results in lower labor expenses, increased facility economics and decreased grievances and no other provider offers the array of support services available to SECURUS customers.

FRIENDS & FAMILY CUSTOMER SERVICE

SECURUS is the only nationwide provider to offer a Customer Care and Billing Center solely dedicated to the friends and families of detainees.

A Division of SECURUS, Correctional Billing Services (CBS) serves end-users 24 hours a day, 7 days a week.

Customer complaints, refund requests and telephone number blocks/unblocks are all handled by CBS.

SECURUS also provides customer service information through:

- Customer Care Web Site
- Automated Phone Assistance
- Facility-Based Kiosk's

CSAT

SECURUS' independent CSAT organization is mandated to identify, measure and improve customer satisfaction levels for all SECURUS customers.

Customer satisfaction is continually monitored in an ongoing process of customer surveys, emails and personal contact.

Annual Customer Satisfaction Value Surveys empower all SECURUS customers to have a say

in how the company is doing and to provide suggestions on improvements and advances.

New product reviews assure we build the type of applications our customers need and that they function in the most efficient manner possible.

FACILITY TECHNICAL SUPPORT

SECURUS' In-House and Field Technical Support personnel are required to pass extensive product knowledge training programs in order to be certified to service SECURUS' partnering facilities.

As a result, extensive experience in detainee service, telecommunications, facility management and specific facility requirements, is a reality with all technical support personnel.

The company maintains a comprehensive maintenance and Service Assurance Policy (SAP) to ensure that all systems are operating at full capacity at all times.

SECURUS' SAP establishes response times and service levels that accomplish a defined objective of maintaining their reputation as not only the premier provider of technologically advanced facility applications, but also as one of the most advanced support teams in the industry.

THE SCN DIFFERENCE

Introduced in 2006, SECURUS' Next Generation Secure Connect Network places users on one of the most advanced transmissions systems in the industry.

This system allows for immediate nationwide system upgrades and repairs from one central location, eliminating the need to wait for a field technician to access the system on-site.

NETWORK OPERATING CENTERS

Operating System redundancy is an important part of the SECURUS value proposition. SECURUS is one of the only companies to provide multiple network operating centers to assure your system is up and running at all time*.

In addition, SECURUS personnel proactively identify and correct potential system and network abnormalities through our centralized suite of diagnostic applications.

Reducing staff labor...

Increasing facility economics...

Reducing user complaints...

Are all a reality with SECURUS'

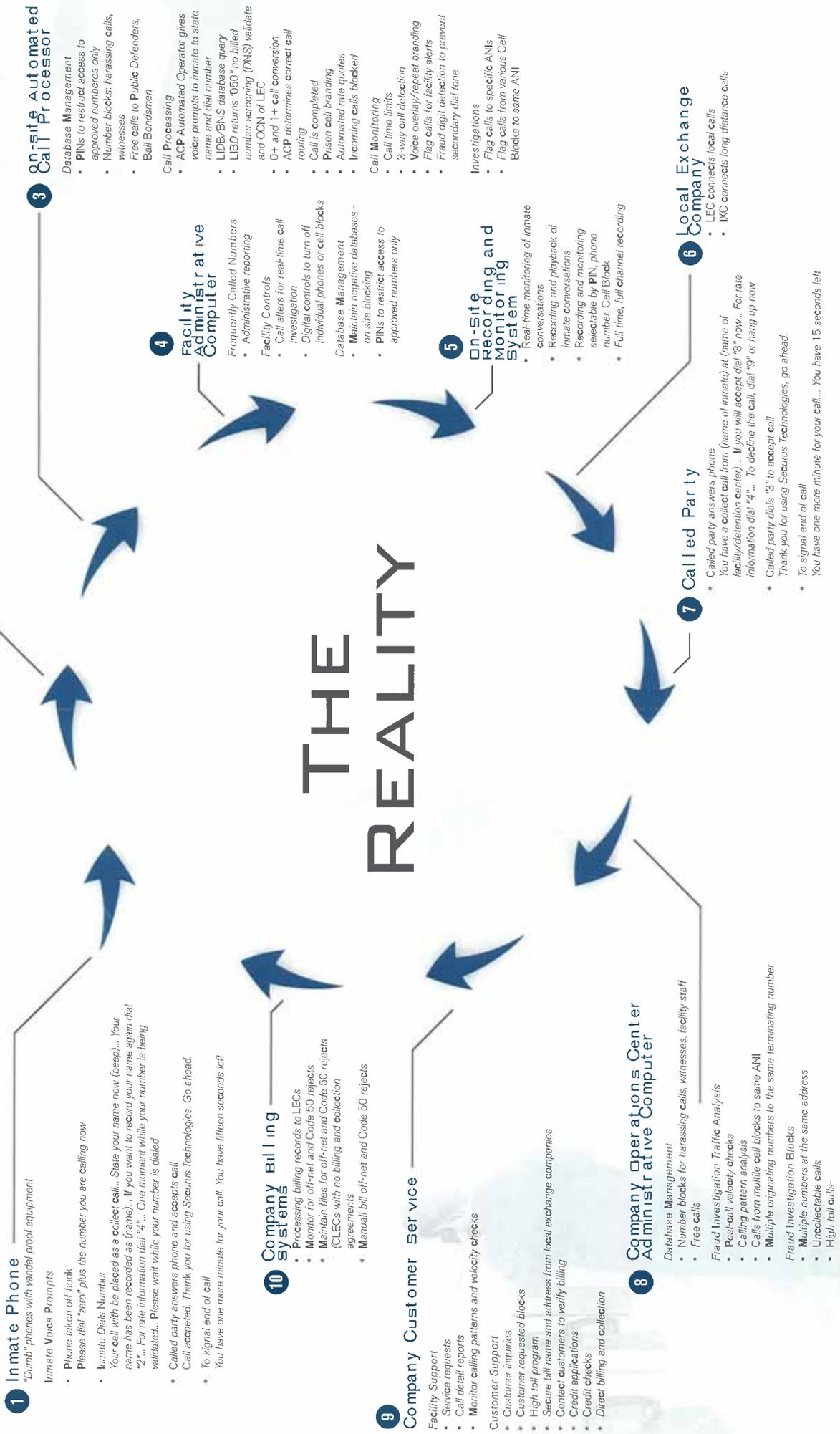
Customer Support Programs

**SECURUS system uptime's are currently 99.9%*

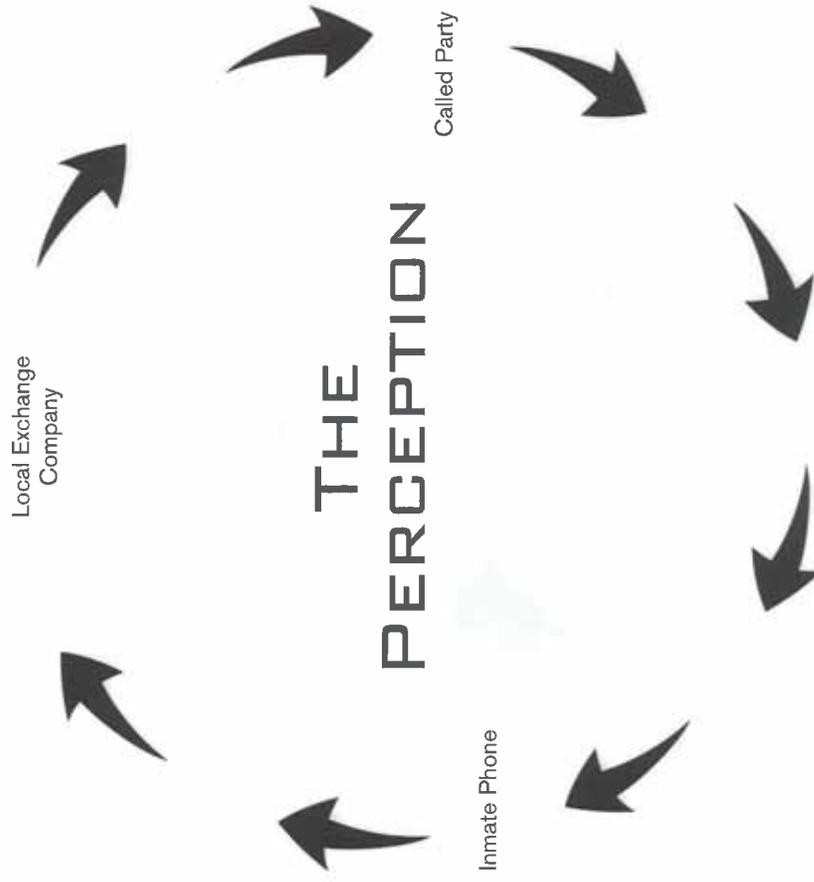
To speak to a Customer Support Program Specialist contact us at:

866.787.5869
only@securustech.net

Is never the case with inmate calling...



THE REALITY



THE WORLD OF SECURUS™

Welcome to the world of SECURUS . . .

- Where technology solutions saves the correctional industry time and opens up new vistas of connectivity
- Where software serves your personnel in every area
- Where information sharing between 3,100 SECURUS partner facilities is a reality
- Where partnering facilities are placed on a pathway to technological advancement

ABOUT THE COMPANY

SECURUS™

- Is the largest independent provider of collect, pre-paid and debit calling services to local, county, state, federal and private correctional facilities in the United States.
- Designs, implements and maintains detainee telecommunication systems and facility management software solutions that streamline the operation of criminal justice facilities
- Where administrators are empowered with advanced administrative, investigative and economic capabilities

SECURUS' SCOPE

SECURUS

- Services over 3,100 correctional facilities in 47 states, including locations operated by city, county, state and federal authorities, juvenile detention centers and private jails
- Consistently offers unequaled expertise, superior service and application driven solutions
- Has earned its place among the correctional industry's top telecommunications and information systems providers
- Sole focus is serving the highly specialized needs of the correctional industry
- and to continually strive to provide creative industry applications and solutions to its customers

SECURUS TECHNOLOGY

SECURUS' SCA Architecture™ took years of development to complete. Its intricate patented structure is comprised of a robust data repository housing multiple data marts each holding billions of bytes of stored information gathered from multiple sources.

SCA's intelligent retrieval system intelligently retrieves all this information and processes all user requests through a unique, cross application, cross data-mart retrieval

process that provides a depth and richness of information that is impossible to produce from individual applications.

SECURUS' SCN Secure Connect Network™ is one of the only netcentric, VoIP, digital transmitted systems in the industry. This system allows complete on-the-fly turn-on/turn-off flexibility for most system features; 24-7 offsite monitoring; immediate system upgrades and repairs from one central location; no fear or liability of losing valuable and irreplaceable data because of local disasters such as hurricanes, floods, fires, localized security breaches.

SECURUS CALLING SOLUTIONS

SECURUS

- SECURUS' Secure Call Platform™ call management system services correctional facilities as well as detainees and friends and family members
- Application continuity between user interfaces allows abbreviated learning curves and simple operation
- System integration allows "Plug-& Play" capabilities for most of SECURUS' applications

SECURUS JAIL MANAGEMENT SOLUTIONS

SECURUS JMS solutions offer:

- Software solutions for jail and facility management
 - Records management
 - Computer-aided dispatch
- Specialized Assistants allow:**
- Solutions tailored to every facility's needs
 - Netcentric capabilities make it possible for information to move seamlessly between different applications, on-site and off

SECURUS APPLICATIONS

Task-specific solutions designed to satisfy areas of prime importance to a facility's operations. SECURUS' applications assist:

- Booking and release officers
- Investigators
- Detainees
- Friends & families
- Administrators
- Support personnel

Many of SECURUS' applications are interoperable, working seamlessly together. SECURUS provides applications designed to service communications, administrative, and support functions, trust account funding, recidivism programs, investigative capabilities, fraud prevention functions, and detainee identification.

THE SECURUS USER INTERFACE

Although the system architecture is one of the most complex in the industry, the beauty of SCA is the way a user harnesses all this new-found power.

Access to all information requests are seamlessly provided through our S-GATE™ user interface. This ingenious, simple to use portal, provides single point access to all programs, applications and services. The logically laid out motherboard design provides the cockpit from which a facility runs its entire operation.

SECURUS SUPPORT

SECURUS Support professional, dedicated customer support centers:

- Are easily accessible 24-7
- Cutting-edge technological capabilities provide unparalleled independent visibility into customers account activity and information
- Site status is monitored continuously by support systems and proactive actions are instituted to correct issues before customers are impacted
- SECURUS' field support services is the largest field support technician program in the industry and provides nationwide support by local, area responsive technicians



SECURUS