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\*ADMITTED IN DC ONLY

November 25, 2014

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 - Notice of Ex Parte  
Presentation

Dear Secretary Dortch:

On November 24, 2014, David Silverman, Senior Vice President and General Counsel for Global Tel\*Link Corporation ("GTL") and the undersigned met with the following staff of the Wireline Competition Bureau, Pricing and Policy Division: Pamela Arluk, Acting Division Chief, Lynne Engledow and David Zesiger, Acting Deputy Division Chiefs, and Rhonda Lien, to discuss matters relating to inmate calling services ("ICS") addressed by the Federal Communications Commission's ("FCC's") *ICS Order and First FNPRM and Second FNPRM*.<sup>1</sup>

The parties discussed the following issues:

<sup>1</sup> *Rates for Interstate Inmate Calling Services*, 28 FCC Rcd 14107 (2013) ("*ICS Order and First FNPRM*"), *pets. for stay granted in part sub nom. Securus Tech., Inc. v. FCC*, No. 13-1280 (D.C. Cir. Jan. 13, 2014), *pets. for review pending sub nom. Securus Tech., Inc. v. FCC*, No. 13-1280 (D.C. Cir. filed Nov. 14, 2013) (and consolidated cases); WC Docket No. 12-375, *Rates for Interstate Inmate Calling Services*, Second Further Notice of Proposed Rulemaking, FCC No. 14-158 (rel. Oct. 22, 2014) ("*Second FNPRM*").

Marlene H. Dortch  
Secretary  
November 25, 2014

- the survey template circulated to correctional facilities to gather inmate calling service cost recovery information, and how the level of correctional facilities' legitimate costs will affect ICS rate caps and the transition period to be implemented;
- the marketplace continues to entertain high site commissions on new contracts;
- certain providers continue to insist that site commissions are permissible to be paid on interstate ICS call revenue and the most efficient FCC enforcement options for enforcing the FCC's *August 20, 2014 Public Notice*,<sup>2</sup> which reiterated that site commissions paid on revenue from interstate ICS calls indicates rates charged by those carriers are excessive even if they are charging the interim rate caps;
- further extension of the Pay Tel Waiver is not warranted, the waiver is distorting the marketplace, and Staff's inquiry as to the marketplace response to the November 11, 2014 expiration of the Pay Tel waiver;
- marketplace practices by Praeses that are skewing the competitive bidding process in favor of ICS providers willing to pay site commissions on interstate ICS call revenue; and
- the nascent technologies being produced that will bring advanced services to the inmate community and expand their access to digital information and provide alternatives to traditional payphone services.

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

Please contact me 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): Pamela Arluk  
Lynne Engledow  
Rhonda Lien  
David Zesiger

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<sup>2</sup> *Rates for Interstate Inmate Calling Services*, 29 FCC Rcd 10043 (2014) ("*August 20 Public Notice*").