



Pillsbury Winthrop Shaw Pittman LLP  
1200 Seventeenth Street, NW | Washington, DC 20036-3006 | tel 202.663.8000 | fax 202.663.8007

Glenn S. Richards  
tel 202.663.8215  
glenn.richards@pillsburylaw.com

January 23, 2015

**VIA ECFS**

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

**Re: WC Docket No. 12-375 - Notice of Ex parte Communication**

Dear Ms. Dortch:

On January 21, 2015, William Pope and Frances L. Schultz, of Network Communications International Corp. (“NCIC”), T.L. Ventroy, President of American Phone Systems, and Glenn Richards, counsel for NCIC, met with Commissioner Mignon, Clyburn, Rebekah Goodheart, legal advisor for Commissioner Clyburn, Daniel Alvarez, legal advisor for Chairman Wheeler, and Carter McMillan, Law Clerk for Commissioner Clyburn, and separately with Rhonda Lien, David Zesiger, Lynne Engledow and Pam Arluk of the Wireline Competition Bureau, and separately with. On January 23, 2015, Mr. Pope, Ms. Schultz and Mr. Richards met separately with Nicholas Degani, legal advisor for Commissioner Pai, Travis Litman, legal advisor for Commissioner Rosenworcel, and Amy Bender, legal advisor for Commissioner O’Rielly. A PowerPoint presentation was distributed and is attached to this *Notice* as Exhibit A.

During these meetings, NCIC discussed issues addressed in the company’s comments filed in the above-referenced proceeding. In particular, Mr. Pope recommended that if the FCC takes further action on inmate calling services (“ICS”) ancillary fees and charges, it should use the order of the Alabama Public Service Commission’s (“PSC”) as a benchmark for those fees and charges. Mr. Pope also expressed concern that eliminating commissions that may be paid by ICS providers could have a detrimental impact on inmates and their families, ICS providers and the jails and prisons that rely on these revenue sources to provide inmate phone services. Without commissions, jails and prisons may curtail or restrict the phone services made available to the inmates.

Ms. Marlene Dortch

January 23, 2015

Page 2

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

By: \_\_\_\_\_/s/\_\_\_\_\_

Glenn S. Richards

*Counsel for Network Communications*

*International Corp.*

CC (*via email*): Commissioner Mignon Clyburn  
Rhonda Lien  
David Zesiger  
Lynne Engledow  
Pam Arluk  
Nicholas Degani  
Travis Litman  
Amy Bender  
Daniel Alvarez  
Rebekah Goodheart  
Carter McMillan