

# Arent Fox

March 9, 2015

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 March 4, 2015, Securus Technologies, Inc. (“Securus”), represented by Richard Smith, Chief Executive Officer, Dennis Reinhold, Vice President and General Counsel, and the undersigned counsel, met with Nicholas Degani, Legal Advisor to Commissioner Pai.

Securus explained that (1) any new rate cap for inmate calling services (“ICS”) must be set above carriers’ average cost, and (2) site commissions should be recoverable via an additive rate, as described in its Comments, Reply Comments, and the letter from the undersigned to Chairman Wheeler and the Commissioners filed February 18, 2015. The timing of the forthcoming ics order also was discussed, in light of Commissioner Clyburn’s recent remarks that it will be released this summer. *See* <<http://www.fcc.gov/document/commissioner-mignon-clyburn-fcba-remarks>>.

Securus did not distribute any materials at the meeting.

This disclosure is made in compliance with 47 C.F.R. § 1.1206(a)(1) and is timely.<sup>1</sup>

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

Sincerely,

s/Stephanie A. Joyce

*Counsel to Securus Technologies, Inc.*

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<sup>1</sup> *Filing Deadlines Updated Due to Adverse Weather Conditions*, DA 15-293 (Mar. 6, 2015).

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Cc: Nicholas Degani, Legal Advisor to Commissioner Pai  
Pamela Arluk, Chief, Pricing Policy Division, Wireline Competition Bureau  
Lynne Engledow, Deputy Chief, Pricing Policy Division, Wireline Competition Bureau

*All via electronic mail*