

Morgan, Lewis & Bockius LLP  
2020 K Street, NW  
Washington, District of Columbia 20006-1806  
Tel. 202.373.6000  
Fax: 202.373.6001  
www.morganlewis.com

**Morgan Lewis**  
C O U N S E L O R S   A T   L A W

**Andrew D. Lipman**  
+1.202.373.6033  
andrew.lipman@morganlewis.com

March 17, 2015

**VIA ELECTRONIC FILING**

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

Re: Interstate Inmate Calling Services, WC Docket No. 12-375

Dear Ms. Dortch:

Pursuant to 47 CFR § 1.1206(b)(2), this letter is to advise you that the undersigned, and Russell M. Blau of Morgan, Lewis & Bockius LLP, made an oral *ex parte* presentation relating to this docket on March 16, 2015, to Pamela Arluk, Lynne Engledow, David Zesiger, and Rhonda Lien of the Pricing Policy Division; and Richard Mallen of the Office of General Counsel.

The presentation covered the topics addressed in the undersigned's written comments and reply comments in this above-captioned docket, as well as the undersigned's written *ex parte* letter dated February 20, 2015 (a copy of which is attached). A written summary of the presentation was distributed to the participants (a copy of which is also attached).

In particular, we discussed the FCC's statutory authority to regulate intrastate ICS rates, and to prohibit or regulate site commission payments as part of its authority to adopt regulations to ensure fair compensation for ICS providers. We emphasized that, if the FCC were to permit prisons to continue to receive site commission payments under existing contracts, or at all, then it would be essential, for the rules to be legally valid, to permit ICS providers to charge rates that covered both the cost of service and the commission payments.

Ms. Marlene H. Dortch  
March 17, 2015  
Page 2

Sincerely,

*s/Andrew D. Lipman*

Andrew D. Lipman

Attachments (2):

Copy of written presentation

Copy of February 20, 2015, written ex parte

c: Pamela Arluk  
Lynne Engledow  
David Zesiger  
Rhonda Lien  
Richard Mallen