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**VIA ECFS**

NOTICE OF EX PARTE

April 28, 2015

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

Re: *Rates for Interstate Inmate Calling Service*, WC Docket No. 12-375

Dear Ms. Dortch:

On April 24, 2015, Jeb Benedict and Paul Cooper (in person), and Tom Dethlefs, Jennifer Roubique and Glenda Weibel (by phone) met on behalf of CenturyLink with representatives of the Wireline Competition Bureau's Pricing Policy Division. Bureau staff at the meeting included Pamela Arluk, Lynne Engledow, Rhonda Lien and Greg Haledjian (in person), and Thomas Parisi (by phone).

At the meeting, CenturyLink reiterated that it does not believe the Commission has legal authority over intrastate inmate calling services (ICS). However, CenturyLink could support reforms that will lower calling costs for inmate families without creating conditions that would lead to reduced availability of inmate calling. CenturyLink explained that such reforms should include the following five elements.

First, the Commission should adopt permanent unitary rate caps for ICS calls at or very near the current levels for interstate calls. These rate caps should be uniform across facilities. CenturyLink noted that while ICS providers incur certain unique costs to serve jails, ICS providers also incur certain unique costs to serve prisons. In CenturyLink's experience, the cost to serve jails with more than 100 inmates and the cost to serve prisons are comparable. Accordingly, the Commission should not adopt a tiered rate cap structure that presupposes that prisons are necessarily less costly to serve than jails.

Second, the Commission should eliminate all but a very narrow class of ancillary fees and impose reasonable caps on those that it allows. CenturyLink explained that the overall cost of ICS to inmate families will not be reduced without restrictions on ancillary fees.

Ms. Marlene H. Dortch

April 28, 2015

Page 2 of 2

Third, the Commission should allow correctional facilities discretion to require commissions on ICS services. Correctional authorities incur a wide range of legitimate costs in making ICS available and should be allowed flexibility to manage their institutions and determine what if any commission or administrative fee structure makes sense for their facilities.

Fourth, the Commission should exclude particularly high-cost facilities such as juvenile detention centers and secure mental health facilities from any rate caps it adopts but make them subject to the same restrictions on ancillary fees. CenturyLink recognizes that these facilities house vulnerable populations of inmates/residents and that they deserve the benefit of any regulatory protections the Commission adopts for other inmates. However, these facilities are particularly expensive to serve primarily due to low call volumes that are typical at these institutions. Alternatively, the Commission could provide an expedited waiver process to review the rates for calls placed from these high cost facilities.

Finally, the Commission should either grandfather existing contracts or provide for at least a full budget cycle as a transition period for any new rules. Correctional facilities and ICS providers will need at least a full budget cycle to adjust to new rules, especially if those rules restrict intrastate rates and site commissions.

At the meeting, CenturyLink also expressed its concerns regarding proposals made by other parties. CenturyLink explained that the Joint Provider Proposal does not do enough to limit ancillary fees, and that the Alabama Commission Proposal, while much better, does not go far enough in capping rates for “single call” services. Finally, CenturyLink explained that there is no need for more than a single officer to certify that the company has complied with Commission rules.

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

Sincerely,

/s/ Thomas M. Dethlefs

Copy via email to:

Pamela Arluk  
Lynne Engledow  
Rhonda Lien  
Greg Haledjian  
Thomas Parisi