



May 18, 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:

Network Communications International Corp. ("NCIC") hereby files this response to the ex parte letter submitted by CenturyLink on May 14, 2015 in the above-referenced docket.¹ NCIC agrees that the FCC should cap the ancillary funding fees to \$5.95 for live operator and \$3.00 for automated IVR and web deposits, as well as prohibiting any markup of deposits through Western Union and MoneyGram. NCIC also agrees that premium or convenience payment options should be priced at \$.25 per minute, but the FCC should allow a 15 minute minimum billing (\$3.75 per call) since the mobile companies have to price on a per-call basis prior to connection.

NCIC agrees that jails and prisons should be allowed site commission payments after the FCC caps the rates, ancillary fees and convenience payment options, which will reduce commission payments to reasonable levels to provide cost-recovery.

NCIC opposes CenturyLink's request for a minimum deposit of \$50 because many inmates in short term facilities are usually there for only one day. NCIC believes that \$20 would be a better minimum deposit in that it would reduce the number of refund requests NCIC receives, and lower the initial cost for the inmate to speak with family members.

NCIC does not support the grandfathering of existing contracts. NCIC demonstrated in its April 16, 2015 ex parte that, following the imposition of rate/ancillary fee/single-payment product caps in Alabama, by lowering flat-priced calls to a postalized per-minute rate, the number of inmate calls increased significantly (40%+) and increased revenue by 2%. The FCC

¹ CenturyLink Notice of Ex Parte Meeting, WC Docket No. 12-375 (dated May 14, 2015).



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should require ICS providers to comply with any new rules within no more than 90 days following publication of those rules in the Federal Register.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

By: _____ /s/
William L. Pope, President
Network Communications International Corp.
606 East Magrill
Longview, Texas 75601
Telephone: (903) 757-4455
bpope@ncic.com