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*ADMITTED IN DC ONLY

July 9, 2015

VIA ECFS

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

**Re: WC Docket No. 12-375 – Written *Ex Parte* Presentation
Global Tel*Link Corporation**

Dear Secretary Dortch:

Global Tel*Link Corporation (“GTL”),¹ by its attorneys, hereby submits this written *ex parte* in response to the July 1, 2015 *ex parte* presentation by the Alabama Public Service Commission (“AL PSC”) in the above-referenced proceeding.² Economists Inc. has reviewed the Baker and Wood analysis contained in the July 1, 2015 AL PSC submission and provides the attached analysis.

¹ This filing is made by GTL on behalf of itself and its wholly owned subsidiaries that also provide inmate calling services: DSI-ITI, LLC, Public Communications Services, Inc., and Value-Added Communications, Inc.

² *Rates for Interstate Inmate Calling Services*, 28 FCC Rcd 14107 (2013) (“*ICS Order and First FNPRM*”), *pets. for stay granted in part sub nom. Securus Tech., Inc. v. FCC*, No. 13-1280 (D.C. Cir. Jan.13, 2014), *pets. for review pending sub nom. Securus Tech., Inc. v. FCC*, No. 13-1280 (D.C. Cir. filed Nov. 14, 2013) (and consolidated cases). *Rates for Interstate Inmate Calling Services*, 29 FCC Rcd 13170 (2014) (“*Second ICS FNPRM*”).

Marlene H. Dortch
Secretary
July 9, 2015

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

Please contact me if you have any questions regarding this matter.

Respectfully submitted,

/s/ Chérie R. Kiser

Chérie R. Kiser

Counsel for Global Tel*Link Corporation

Attachment

cc (via e-mail): Madeleine Findley
Pamela Arluk
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Further Comparison of Correctional Facility ICS Cost Analyses

by
Stephen E. Siwek and Christopher C. Holt
(WC Docket No. 12-375)

I. Baker and Wood Proposed Facility Cost Recovery Fees Compared with Existing Site Commission Payments

The Baker and Wood *ex parte* notice (filed July 1, 2015) puts forward a “Framework for Consideration” that includes a proposed “facility cost recovery” payment amount, denominated on a per-minute basis.¹ Baker and Wood have explained that these recovery rates imply compensation levels that “may be significantly lower than existing site commissions depending on jail size and the level of compensation currently received.”² Table 1 below compares the Baker and Wood proposed compensation amounts to existing (2014) site commission levels using data provided by carriers.

TABLE 1: BAKER AND WOOD PER MINUTE FACILITY COST RECOVERY PROPOSAL

FCC Facility Size Category	Baker and Wood Proposed "Cost Recovery" per MOU	Total Site Commissions	Total MOUs	Baker and Wood Proposed Annual Compensation	Baker and Wood Proposed Compensation % of Site Comms.
Jails 0 - 99 ADP	\$0.070	\$11,436,102	86,293,245	\$6,040,527	53%
Jails 100 - 349 ADP	\$0.070	\$38,929,042	360,285,743	\$25,220,002	65%
Jails 350 - 999 ADP	\$0.050	\$72,444,363	615,556,271	\$30,777,814	42%
Jails 1,000 - 2,499 ADP ¹	\$0.050	\$90,999,414	763,049,357	\$38,152,468	42%
Jails 2,500 & Over ADP ¹	\$0.030	\$78,522,594	658,428,581	\$19,752,857	25%
Prisons 1 - 4,999 ADP	\$0.020	\$4,553,181	176,685,142	\$3,533,703	78%
Prisons 5,000 - 19,999 ADP	\$0.020	\$45,282,831	506,040,937	\$10,120,819	22%
Prisons 20,000 & Over ADP	\$0.020	\$113,032,529	1,808,086,937	\$36,161,739	32%

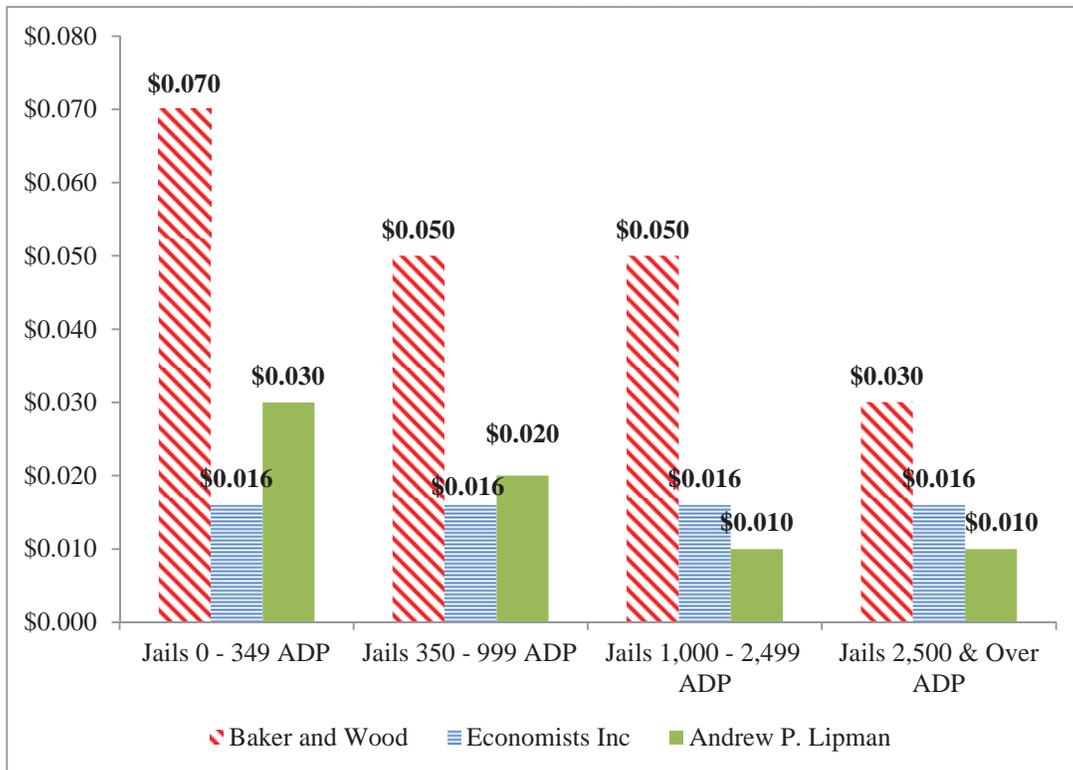
¹ Size categories vary from those designated by the FCC's mandatory data collection Sep. 26, 2013 ICS Order. Sources: Darrell A. Baker and Don Wood Ex Parte, July 1, 2015 at 5; Carrier Data Collection Submissions

1. See Baker and Wood Ex Parte Notice, July 1, 2015, at 2.
2. *Id.*

II. Comparison with Other Cost Estimates and Maximum Rate Proposals in the Record

Figure 1 compares the Baker and Wood proposal with the Economists Incorporated cost estimates and the Andrew P. Lipman proposed maximum levels of compensation.

FIGURE 1: COMPARISON OF BAKER AND WOOD COST RECOVERY PROPOSAL WITH RECORD ESTIMATES OF COSTS PER MINUTE



Sources: Darrell A. Baker and Don Wood Ex Parte, July 1, 2015 at 5; Andrew P. Lipman Ex Parte, May 1, 2015 at 6; Economists Inc., Correctional Facility ICS Cost Analysis, Sep. 18, 2014 at 10

Note: The Andrew P. Lipman size categories vary from those designated by the FCC's mandatory data collection Sep. 26, 2013 ICS Order.

As shown in the figure, the Baker and Wood proposed facility cost recovery fees are significantly higher than both the Economists Incorporated cost estimates and the Andrew P. Lipman proposed maximum levels of compensation. The Baker and Wood estimates range from 88 percent (for the largest jails) to 338 percent (for the smallest jails) higher than the Economists Incorporated estimates, and 100 percent (for the largest jails) to 400 percent (for jails 1,000 – 2,499 ADP) higher than the Andrew P. Lipman proposed maximum levels of compensation.