

August 13, 2015

By Electronic Filing

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

Ex Parte Presentation

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

Dear Ms. Dortch:

Attached please find an ex parte presentation from Pay Tel Communications, Inc. (“Pay Tel”) providing supplemental information to several arguments that Pay Tel has previously made in the record in this Docket. Specifically, the attached ex parte presentation provides further information and data regarding:

- (1) The fact that the number of LEC-billed collect calls has been diminishing and continues to diminish in the ICS industry and now represents a very tiny percentage of all calls, which supports Pay Tel’s position that the Commission need not adopt different ICS rate caps for collect versus prepaid/debit calls;
- (2) Publicly available sources of average daily population (“ADP”) in jails;
- (3) New Mexico’s efforts at regulating ICS, where a grandfathering period based on the effective date of a reform order, rather than its adoption date, enabled facilities and vendors to enter into agreements that circumvented reform efforts; and
- (4) Market activity in the ICS industry supporting the point that larger ICS providers are abandoning small- and medium-sized jails.

Please do not hesitate to contact the undersigned should any questions arise concerning this letter or the issues discussed.

Sincerely yours,

/s/ Timothy G. Nelson

Timothy G. Nelson

cc (via email):

Rebekah Goodheart
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Gregory Haledjian
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