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*ADMITTED IN DC ONLY

January 14, 2016

Via ECFS

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

**Re: WC Docket No. 12-375 – Global Tel*Link Corporation Petition for Waiver
of Deadline to Implement Rule 64.6110 for Prisons**

Dear Secretary Dortch:

On January 5, 2016, Global Tel*Link Corporation (“GTL”) filed a Petition for Waiver (“Petition”) in the above-referenced proceeding requesting a 90 day extension of time for GTL to implement the online posting requirements of new Rule § 64.6110 as applied to prisons. The waiver would permit GTL to update its website to accommodate the reporting requirement for prisons and jails at the same time. New Rule § 64.6110 is scheduled to take effect for prisons on March 17, 2016 and for jails on June 20, 2016.¹

After conversations with Commission staff, GTL understands that new Rule § 64.6110, along with certain other rules and requirements adopted as part of the *Second ICS Order*, is subject to the Paperwork Reduction Act (“PRA”).² The PRA requires the Commission to seek comment on new information collection requirements, and then submit the new requirements to the Office of Management and Budget (“OMB”) for approval prior to the new requirements taking effect.³

¹ 80 Fed. Reg. 79136 (Dec. 18, 2015); *see also* WC Docket No. 12-375, *Rates for Interstate Inmate Calling Services*, Second Report and Order and Third Further Notice of Proposed Rulemaking, FCC 15-136 (rel. Nov. 5, 2015) (“*Second ICS Order*”).

² 44 U.S.C. § 3501(1).

³ 44 U.S.C. §§ 3501-3520; *see also* *Black Citizens for a Fair Media v. FCC*, 719 F.2d 407, 416 (D.C. Cir. 1983) (citing S. Rep. No. 930, 96th Cong., 2d Sess. 3, *reprinted in* 1980 U.S.C.C.A.N. 6241, 6243).

GTL understands that the Commission will be issuing a notice seeking comment on the new information collection requirements adopted in the *Second ICS Order* that are subject to the PRA. Once the PRA review process is completed and OMB approval has been issued, the Commission will issue a Public Notice to address GTL's waiver regarding Rule § 64.6110 unless resolution of the PRA issues renders GTL's waiver moot.

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