

February 16, 2016

VIA ECFS

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

Re: *Ex Parte Submission*
Rates for Interstate Inmate Calling Services
WC Docket No. 12-375

Praeses recently became aware of an article published by the Huffington Post entitled *Someone Wrote a Sketchy Guide for Evading New Rules on Prison Phone Costs*.¹ The article discusses an anonymous letter filed with the Federal Communications Commission (“Commission”) by the Martha Wright Petitioners as an attachment to their February 3, 2016 *ex parte* filing.² The anonymous letter provides advice to correctional facilities regarding the Commission’s *Second Report and Order* in this proceeding.³

Praeses is submitting this *ex parte* letter to the Commission to make clear that it did not author the anonymous letter and would not recommend the “strategy” set forth in the letter to any of its correctional facility clients. Praeses acknowledges that the “strategy” outlined in the letter is inconsistent with generally accepted correctional industry practice, as well as express guidance

¹ Dana Liebelson and Ben Walsh, *Someone Wrote a Sketchy Guide for Evading New Rules on Prison Phone Costs*, HUFFINGTON POST (Feb. 10, 2016 11:39am), http://www.huffingtonpost.com/entry/evading-rules-prison-phone-costs_us_56bb5203e4b08ffac1235a00?4i996bt9.

² Letter from Lee. G. Petro, Counsel for the Wright Petitioners, to Marlene H. Dortch, Secretary, FCC, WC Docket 12-375, at Exhibit A (Feb. 3, 2016).

³ *Rates for Interstate Inmate Calling Services*, Second Report and Order and Third Further Notice of Proposed Rulemaking, 30 FCC Rcd 12763 (2015).

February 16, 2016

Page 2

provided by the Wireline Competition Bureau regarding mandatory fees.⁴ Further, Praeses has advised its clients that the adoption of such mandatory fees is strongly disfavored by the Commission.

Please do not hesitate to contact the undersigned with any questions that you may have regarding this matter.

Sincerely,

/s/ Phil Marchesiello _____

Phil Marchesiello

Counsel to Praeses LLC

⁴ Letter from Matthew S. Del Nero, Chief, Wireline Competition Bureau, FCC, to Robert Pickens, President, Securus Technologies, Inc., WC Docket No. 12-375, DA 15-1382 (Dec. 3, 2015).