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March 21, 2016

**BY ECFS**

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

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

Dear Sec. Dortch:

On January 19, 2016, Correct Solutions, LLC (“Correct Solutions”) sent a letter to you in this proceeding indicating its concern for the accuracy of the FCC’s interpretation of Correct Solutions’ cost data submitted in August, 2014 in response to the FCC’s Mandatory Data Collection and its presumed reliance on that data in FCC Order 15-136.<sup>1</sup> As stated in its January 19<sup>th</sup> letter, Correct Solutions believes that it may be one of the two small firms whose cost data was used to set rates for the entire inmate calling industry; however, Correct Solutions cannot confirm this in that it has not reviewed a confidential version of FCC Order 15-136 and the costs reflected therein.

Subsequently, on February 19, 2016, as counsel for Correct Solutions, I filed an executed Confidential Second Report and Order and Third Further Notice of Proposed Rulemaking Recipient Acknowledgment and an Acknowledgment of Confidentiality to Protective Order, adopted in this proceeding on December 19, 2013. On February 22, 2016, Securus Technologies, Inc. (“Securus”) filed an Objection to Disclosure of Confidential Information to my request to obtain a confidential version of FCC Order 15-136.

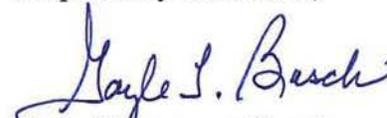
<sup>1</sup> WC Docket No. 12-375, *Rates for Interstate Inmate Calling Services*, Second Report and Order and Third Further Notice of Proposed Rulemaking, FCC 15-136, released November 5, 2015 (“FCC Order 15-136”).

This letter is in reply to Securus's objection. In its objection, Securus expresses concerns with the disclosure of its extremely sensitive data. While this is a valid concern of Securus, it is likewise a valid concern of Correct Solutions. Correct Solutions believes that the terms of the Protective Order provide protection to both parties regarding the improper disclosure of the data. In signing the Acknowledgment of Confidentiality as required by the Protective Order issued December 19, 2013, I have agreed to be bound to the terms of that Order and have made the appropriate acknowledgments and certifications necessary to maintain the confidential nature of not only Securus' data, but the data of all other ICS providers referenced or discussed therein.

Additionally, Securus claims that it is not appropriate for Correct Solutions to obtain the confidential data included in FCC Order 15-136 because the rate making portion of the proceeding is over and Correct Solutions is not a participant in the appeal of FCC Order 15-136. Correct Solutions believes that Securus' objection is without merit, in that a Motion for Reconsideration is pending before the FCC and an appeal involving these rates in particular is pending before the United States Court of Appeals for the District of Columbia Circuit.<sup>2</sup> Securus has filed one of the Petitions for Review and has sought review of the rates established by the FCC, which rates were based on data provided by two small ICS providers. As stated before, Correct Solutions believes that it was one of those two small ICS providers whose cost data was relied upon by the FCC in establishing the rates reflected in FCC Order 15-136. A review of the confidential version of FCC Order 15-136 may not only be beneficial to Correct Solutions in assessing the accuracy of its cost data reflected therein, but ultimately may be of assistance in determining a supportable, fair and reasonable rate for ICS.

For the above stated reasons, we respectfully request that the FCC approve the release of the confidential version of FCC Order 15-136 to me as counsel for Correct Solutions, pursuant to the terms of the Protective Order issued on December 19, 2013 in this docket.

Respectfully Submitted,



Gayle Thomasson Busch

GTB/dma

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<sup>2</sup> *Global Tel\*Link, et al. v. Federal Communications Commission and the United States of America*, Case No. 15-1461 and Consolidated Cases (D.C. Circuit, U.S. Ct. App., filed Dec. 18, 2015).