

CAHILL GORDON & REINDEL LLP
EIGHTY PINE STREET
NEW YORK, NY 10005-1702

FLOYD ABRAMS
L. HOWARD ADAMS
ROBERT A. ALESSI
HELENE R. BANKS
ANIRUDH BANSAL
LANDIS C. BEST
BRADLEY J. BONDI
SUSAN BUCKLEY
KEVIN J. BURKE
JAMES J. CLARK
BENJAMIN J. COHEN
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STUART G. DOWNING
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ANASTASIA EFIMOVA
JENNIFER B. EZRING
JOAN MURTAGH FRANKEL
JONATHAN J. FRANKEL

BART FRIEDMAN
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CHARLES A. GILMAN
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DOUGLAS S. HOROWITZ
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DAVID G. JANUSZEWSKI
ELAI KATZ
THOMAS J. KAVALER
BRIAN S. KELLEHER
DAVID N. KELLEY
RICHARD KELLY
CHÉRIE R. KISER*
EDWARD P. KRUGMAN
JOEL KURTZBERG
MARC R. LASHBROOK

TELEPHONE: (212) 701-3000
WWW.CAHILL.COM

1990 K STREET, N.W.
WASHINGTON, DC 20006-1181
(202) 862-8900

CAHILL GORDON & REINDEL (UK) LLP
24 MONUMENT STREET
LONDON EC3R 8AJ
+44 (0)20 7920 9800

WRITER'S DIRECT NUMBER

202-862-8950
ckiser@cahill.com

ALIZA R. LEVINE
JOEL H. LEVITIN
GEOFFREY E. LIEBMANN
ANN S. MAKICH
JONATHAN I. MARK
BRIAN T. MARKLEY
WILLIAM J. MILLER
NOAH B. NEWITZ
MICHAEL J. OHLER
ATHY A. O'KEEFFE
DAVID R. OWEN
JOHN PAPACHRISTOS
LUIS R. PENALVER
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JAMES ROBINSON
THORN ROSENTHAL
TAMMY L. ROY

JONATHAN A. SCHAFFZIN
JOHN SCHUSTER
MICHAEL A. SHERMAN
DARREN SILVER
HOWARD G. SLOANE
JOSIAH M. SLOTNICK
RICHARD A. STIEGLITZ JR.
SUSANNA M. SUH
ANTHONY K. TAMA
JONATHAN D. THIER
JOHN A. TRIPODORO
GLENN J. WALDRIP, JR.
HERBERT S. WASHER
MICHAEL B. WEISS
S. PENNY WINDLE
DAVID WISHENGRAD
COREY WRIGHT
JOSHUA M. ZELIG
DANIEL J. ZUBKOFF

*ADMITTED IN DC ONLY

April 21, 2016

VIA ECFS

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

Re: GN Docket No. 13-111 - Global Tel*Link Corporation - Notice of *Ex Parte* Presentation

Dear Secretary Dortch:

On April 19, 2016, Global Tel*Link Corporation (“GTL”) representatives David Silverman, Executive Vice President and Chief Legal Officer, and the undersigned met with Nicholas Degani, Legal Advisor to Commissioner Ajit Pai, to discuss matters pertinent to the Federal Communications Commission (“FCC”) proceeding, *Promoting Technological Solutions to Combat Contraband Wireless Device Use in Correctional Facilities*.¹

GTL provided an overview of its direct experience with the development and provision of managed access systems (“MAS”) at correctional facilities. GTL explained it has vetted more MAS providers and installed more MAS solutions than any other corrections services company in the country. It has experienced first-hand the challenges of keeping pace with the software changes required to respond to the rapidly changing wireless technology, which is the primary reason wireless carriers must be willing and active partners in the fight against contraband wireless devices in correctional facilities.

¹ *Promoting Technological Solutions to Combat Contraband Wireless Device Use in Correctional Facilities, et al.*, 28 FCC Rcd 6603 (2013).

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Managed access systems are also plagued by an overly complicated and lengthy process for licensing to operate in a non-commercial setting, and staggering costs to deploy and operate. Depending on the size of the facility, the number of sites within a facility complex, the characterization of the surrounding geography from a topographical and urban versus rural standpoint, the architectural structure of the facility, and the ongoing system maintenance and software upgrades, costs to deploy can start at \$1.5 million or more per customer. This does not include any of the regulatory costs for authority to operate such systems. Funding is a critical component to MAS deployment. GTL suggested possible models for funding such as the E911 cost recovery mechanism² or direct state efforts like those undertaken by the State of Maryland to deploy MAS at two facilities.³

GTL also shared that with the many issues surrounding MAS, correctional facilities are finding better, more immediate, and less costly ways to combat contraband wireless devices in their facilities. These include sophisticated new technical devices that can detect cellphones from three feet away and cellphone detection dogs.

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

cc (via e-mail): Nicholas Degani

² *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, 14 FCC Rcd 20850, ¶ 19 (1999).

³ *Analysis of the FY 2015 Maryland Executive Budget*, 2014.