

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  
SEAN M. DAVIS  
STUART G. DOWNING  
ADAM M. DWORKIN  
ANASTASIA EFIMOVA  
JENNIFER B. EZRING  
JOAN MURTAGH FRANKEL  
JONATHAN J. FRANKEL

BART FRIEDMAN  
CIRO A. GAMBONI  
CHARLES A. GILMAN  
JASON M. HALL  
WILLIAM M. HARTNETT  
CRAIG M. HOROWITZ  
DOUGLAS S. HOROWITZ  
TIMOTHY B. HOWELL  
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  
KIMBERLY PETILLO-DÉCOSSARD  
MICHAEL W. REDDY  
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

June 9, 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 June 7, 2016, Global Tel\*Link Corporation (“GTL”) representatives, Christopher R. Tarbert, Senior Vice President, Strategic Accounts, Mitch Volkart, Product Manager – Intelligence Tools, and the undersigned met with Brendan Carr, Legal Advisor, Wireless, Public Safety, and International, for 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*.<sup>1</sup>

GTL provided an overview of its direct experience with the development and provision of managed access systems (“MAS”) at correctional facilities. GTL shared details about its MAS operations and the ongoing challenges the industry faces with this type of deployment. The parties also discussed the difference in cost between a MAS and a facility relying on jamming technology. GTL explained how jamming technology used at a foreign correctional facility has proven to be a less costly means of combating contraband cellphones than its active MAS. The costs for urban MAS are even higher than for rural correctional facilities.

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

JUNE 9, 2016

- 2 -

GTL also explained how rapidly changing wireless technology keeps costs high. MAS must be nimble and have access to real time wireless technology changes to adjust the systems in order to maintain detection, suppression, and deactivation capabilities. Policies must ensure wireless carriers are willing and active participants in the effort to eliminate contraband cellphone use.

The parties discussed whether controlled jamming was technically possible and the effectiveness of deploying jamming technology within the correctional housing units. The parties reviewed whether E911 location technology is sophisticated enough to locate and disable illegal cellphones in facilities without compromising the use of lawful wireless devices. The parties also discussed streamlining the process with wireless carriers to deactivate cellphones that have positively identified as contraband cell phones.

GTL also shared some of the layered solutions it is using in place of, or in addition to, MAS such as TSA-style security and other investigative tools that provide correctional facilities more comprehensive security and law enforcement intelligence for managing their facilities.

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): Brendan Carr, Legal Advisor