



NCIC Operator Services

August 28, 2009

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.

Suite TW-A325

Washington, D.C. 20554

Re: WC Docket No. 09-144, In the Matter of 'Securus Technologies, Inc. Petition for Declaratory Ruling'

Dear Ms. Dortch:

Network Communications International Corp (NCIC) hereby submits this letter in support of the Securus Petition for Declaratory Ruling in WC Docket No. 09-144. The Petition requests the FCC to reiterate that the stipulations allowing carriers to block dial-around methods within the inmate correctional industry is also relevant to call diversion schemes.

NCIC is an inmate telecommunications operator service and equipment provider that is certificated as a telecommunications carrier nationwide. NCIC has provided operator services for over 13 years and is heavily invested in the inmate industry by serving hundreds of facilities across the nation. Providing a quality controlled service is of utmost priority and is compromised as a result of call forwarding and call diversion schemes. Such schemes spawn security threats that are otherwise preventable through call control measures provided by the contracted service provider.

NCIC is familiar with call diversion schemes and can speak from experience as to the security threat they pose. In addition to evading security measures, some of these companies are not operating under proper authority. These same companies are dodging taxes and regulatory fees such as the Universal Service Fund and the Interstate Telecommunications Relay Services Fund due to respective government agencies. Therefore, NCIC supports the Petition's request and also requests that regulatory investigations ensue to ensure these companies are properly certificated and are in compliance with all regulatory requirements.

Respectfully submitted,

Network Communications International Corp. (NCIC)

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