

October 24, 2011

The Honorable Julius Genachowski, Chairman
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

RE: CG Docket No. 11-116

Dear Chairman Genachowski:

I'm writing this letter as a concerned business owner of Pay Tel Communications, Inc., a mid-size provider of inmate telephone service. Pay Tel is located in Greensboro, North Carolina and we currently employ 65 people. We serve approximately 200 correctional facilities.

While I fully support your efforts to protect consumers from phone bill cramming, I am deeply concerned about the concept of an outright prohibition against third-party billing. Third party billing is still a viable service used to charge called parties for collect phone calls from jails, prisons and other locations. In addition, these telecommunications services are already adequately controlled through existing regulations (CFR§67.703, CFR§67.708 and CFR§67.710) ensuring that consumers are protected through branding, rate quotes, acceptance requirements, etc.

We also strongly believe that third- party billing services provide great value to businesses and consumers alike, and that these services must be preserved in any new rules that are implemented for the industry. In the corrections industry specifically, those first calls placed by an inmate following an arrest are critical and despite the growing popularity of prepaid calling options, not all called parties or inmates are willing or able to establish pre-paid accounts. As such, traditional collect calling, together with the necessary third-party billing services must be retained in order to ensure that all parties can continue to be served. An outright ban of third-party billing would unnecessarily harm businesses like ours, as well as those correctional facilities that we serve and the inmates housed in those facilities.

Pay Tel supports your worthy goal of protecting consumers from cramming. However, we believe that this is best achieved through the implementation of reasonable measures (such as those already imposed on operator services and inmate providers) and not through an outright ban of a service that is valued by consumers and a critical aspect of existing inmate telephone services nationwide. As you consider applying the rules mentioned in the Notice for Proposed Rulemaking, we urge you to consider the financial impact they would have to business and consumers.

Sincerely,

/s/ Vincent Townsend

Vincent Townsend
President
(866) 729-8352 x227
vtownsend@paytel.com