

Arent Fox

May 1, 2012

VIA ECFS

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

Stephanie A. Joyce

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Re: Updated Notice of Permitted *Ex Parte* Meeting, WC Docket No. 09-144 and CC Docket No. 96-128

Dear Ms. Dortch:

On April 24, 2012, Securus Technologies, Inc. met with the following persons at the Commission to discuss the Securus Petition for Declaratory Ruling and the rate issues contained in the petitions of Martha Wright:

Victoria Goldberg – Acting Chief, Pricing Policy Division, Wireline Competition Bureau

Deena Shetler – Associate Bureau Chief, Wireline Competition Bureau

Nicholas Alexander – Deputy Division Chief, Pricing Policy Division

Pamela Arluk – Assistant Division Chief, Pricing Policy Division, Wireline Competition Bureau

Travis Litman – Wireline Competition Bureau

Michele Berlove – Competition Policy Division, Wireline Competition Bureau (by telephone)

Representing Securus were Dennis J. Reinhold, Vice President and General Counsel, Curtis L. Hopfinger, Director–Regulatory and Government Affairs, and the undersigned. This disclosure is made in compliance with 47 C.F.R. § 1.1206(a)(3).

During the meeting, the attendees discussed matters raised in the Securus Petition, the pleadings that Millicorp, which operates ConsCallHome.com, has filed in WC Docket No. 09-144, and the rate and cost information submitted in CC Docket No. 96-128. Also discussed was the meeting that Securus attended on April 23, 2012, with several organizations including Public Knowledge and Free Press, regarding these issues. Securus agreed to meet with those organizations again to explore ways to address inmate calling rates.

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Securus noted that it has recently won high-volume contracts that enable it to provide very low rate, such as the Missouri Department of Corrections contract. Ms. Shetler requested that Securus put these new rates into the record, and Securus agreed to do so.

Securus also explained the effect of site commissions on rates, and the fact that site commissions are the product of a public policy decision made by correctional authorities, and in some cases state legislatures, to fund prison operations and inmate welfare funds through the inmate telecommunications system. Securus explained that, as a vendor, it cannot prohibit the imposition of site commissions.

Finally, in response to a question from Ms. Shetler regarding a recent *ex parte* filing in the record, Securus explained that any improper statements by a customer service representative to a subscriber of call diversion arrangements was not reflective of corporate policy, and that the matter was addressed immediately throughout the company.

Sincerely,

s/Stephanie A. Joyce

Counsel to Securus Technologies, Inc.