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June 15, 2012

VIA ECFS

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

Stephanie A. Joyce

Attorney
202.857.6081 DIRECT
202.857.6395 FAX
joyce.stephanie@arentfox.com

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

Dear Ms. Dortch:

On June 14, 2012, Securus Technologies, Inc. met with Priscilla Delgado Argeris, Legal Advisor to Commissioner Rosenworcel, to discuss the Securus Petition for Declaratory Ruling and the rate issues contained in the petitions of Martha Wright.

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

Securus explained the security concerns that gave rise to its Petition which is under consideration in WC Docket No. 09-144. Securus described the path that a secure inmate call takes, compared to the path that a diverted call takes. It noted that correctional authorities require that attempts to use call diversion be blocked, and that existing Commission precedent permits such blocking.

With regard to inmate calling rates (CC Docket No. 96-128), Securus listed several factors that cause inmate calling rates to be higher than residential telephone service, including the costs of bad debt, research and development, and site commissions. Securus explained 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. It further stated that site commissions are a direct cost of service and should not be considered as profit.

Securus also noted that it recently has won high-volume contracts that enable it to provide very low rates, such as the Missouri Department of Corrections contract. Securus referred Ms. Argeris to the *ex parte* filing that it made on May 10, 2012.

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Finally, Securus stated that it has met with the public interest groups that have shown an interest in inmate calling rates, and that it offered to hold another such meeting soon.

Large, foam-backed versions of the attached documents were given to Ms. Argeris during the meeting.

Sincerely,

s/Stephanie A. Joyce

Counsel to Securus Technologies, Inc.

Attachments