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June 26, 2013

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte Presentation - WC Docket No. 12-375

Dear Secretary Dortch:

On June 25, 2013, David Silverman, Senior Vice President and General Counsel of Global Tel*Link Corporation (“GTL”), and the undersigned met with Randy Clarke, Lynne Engledow, Kalpak Gude, Greg Haledjian, Lane Johnson, Melissa Kirkel, Rhonda Lien, Anjali Vohra, and David Zesiger of the Wireline Competition Bureau to discuss matters relating to inmate calling services (“ICS”) and the Commission’s pending proceeding on interstate ICS rates.

GTL provided an overview of its business, the ICS industry business model, and the unique security and public safety components required by correctional facility customers. The overview also highlighted the differences between ICS and traditional telecommunications services, and the key role that the request for proposal (“RFP”) process plays in providing ICS. GTL discussed the numerous components that affect the cost of ICS, which are driven by the individual needs of the correctional facility customer. GTL also explained how the pricing for its current calling products (debit, prepaid, and collect) is structured. In addition, GTL described some of the future services it plans to make available to correctional facility customers.

Finally, GTL responded to the claims of some commenters regarding the Commission’s legal authority to regulate intrastate ICS rates, and explained that the Commission does not have the legal authority to regulate intrastate ICS rates under Sections 201, 226, or 276 of the Communications Act of 1934, as amended.

GTL utilized its presentation previously submitted on October 3, 2012 in CC Docket 96-128 as a roadmap for the discussion.

Please contact the undersigned if you have any questions regarding this matter.

Respectfully submitted,

/s/ Chérie R. Kiser

Chérie R. Kiser

Counsel to Global Tel*Link Corporation

cc (via e-mail): Randy Clarke
Lynne Engledow
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Greg Haledjian
Lane Johnson
Melissa Kirkel
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