



SECURUSTM
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VIA ECFS AND ELECTRONIC MAIL (Mignon.Clyburn@FCC.gov)

Acting Chairwoman Mignon Clyburn
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Workshop on Inmate Calling Services (WC Docket No. 12-375)

Dear Acting Chairwoman Clyburn:

As Vice President, General Counsel and Secretary of Securus Technologies, Inc. ("Securus"), I am writing to express my disappointment and dismay in not having been invited to participate in the Workshop on Inmate Calling Services that will be held tomorrow, July 10, 2013.

It certainly seems disingenuous that neither of the two largest inmate telecom companies (Securus and Global Tel*Link) is on the Inmate Calling Services panel. Instead, you chose two of the smaller industry players, with combined market share of approximately 5%, to participate. From the make-up of the panelists on the Workshop, with all due respect, it appears that you want a very one-sided perspective of inmate rates presented, rather than a truly open workshop to analyze the policy issues related to inmate calling services and craft a multi-stakeholder solution. That is the type of event Securus envisioned when it supported CenturyLink's request for creation of an Advisory Committee.

Securus, through outside counsel, offered several times to appear and speak during the Workshop. As you know, Securus has been extremely active since 2002 in assisting the Commission with the issues involved in setting inmate calling rates. Securus has filed comments in both CC Docket 96-128 and WC Docket 96-128, even hiring expert economists to digest and analyze data about the costs of providing inmate calling services. We have always complied with requests to meet with anyone at the Commission to answer questions, and have provided additional information for the record upon every request.

Further, Securus has met with Your Honor directly on the inmate rate issue, as well as with the Wireline Competition Bureau, the General Counsel, Commissioner Pai, and the Office of Commissioner Rosenworcel. Securus also has met several times with the public interest entities that advocate federal inmate calling rates, including the Wright Petitioners, the United Church of Christ, Free Press, and Public Knowledge. No other service provider has done so much work on this matter.

We are dismayed that the Commission decided not to include Securus in the Workshop despite its longstanding relationship with the Wireline Competition Bureau and your Office. Securus' knowledge and perspective would have been a valuable addition to the discussion.

Sincerely,



Dennis Reinhold
Vice President, General Counsel and Secretary
Securus Technologies, Inc.

Cc: Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Julie Veach, Chief, Wireline Competition Bureau
Sean Lev, General Counsel
Rebekah Goodheart, Legal Advisor to Acting Chairwoman Clyburn
Nick Degani, Legal Advisor to Commissioner Pai
Priscilla Delgado Argeris, Legal Advisor to Commissioner Rosenworcel
Deena Shetler, Associate Bureau Chief, Wireline Competition Bureau
Kalpak Gude, Chief, Pricing Policy Division, Wireline Competition Bureau
All via electronic mail