

CAHILL GORDON & REINDEL LLP
EIGHTY PINE STREET
NEW YORK, NY 10005-1702

FLOYD ABRAMS
L. HOWARD ADAMS
ROBERT A. ALESSI
HELENE R. BANKS
ANIRUDH BANSAL
LANDIS C. BEST
SUSAN BUCKLEY
KEVIN J. BURKE
JAMES J. CLARK
BENJAMIN J. COHEN
STUART G. DOWNING
ADAM M. DWORKIN
JENNIFER B. EZRING
JOAN MURTAGH FRANKEL
JONATHAN J. FRANKEL
BART FRIEDMAN
CIRO A. GAMBONI
WILLIAM B. GANNETT

CHARLES A. GILMAN
STEPHEN A. GREENE
JASON M. HALL
WILLIAM M. HARTNETT
CRAIG M. HOROWITZ
DOUGLAS S. HOROWITZ
TIMOTHY B. HOWELL
DAVID G. JANUSZEWSKI
ELAI KATZ
THOMAS J. KAVALER
BRIAN S. KELLEHER
DAVID N. KELLEY
CHÉRIE R. KISER*
EDWARD P. KRUGMAN
JOEL KURTZBERG
ALIZA R. LEVINE
JOEL H. LEVITIN
GEOFFREY E. LIEBMANN

TELEPHONE: (212) 701-3000
FACSIMILE: (212) 269-5420

1990 K STREET, N.W.
WASHINGTON, DC 20006-1181
(202) 862-8900
FAX: (202) 862-8958

AUGUSTINE HOUSE
6A AUSTIN FRIARS
LONDON, ENGLAND EC2N 2HA
(011) 44.20.7920.9800
FAX: (011) 44.20.7920.9825

WRITER'S DIRECT NUMBER

ANN S. MAKICH
JONATHAN I. MARK
BRIAN T. MARKLEY
WILLIAM J. MILLER
NOAH B. NEWITZ
MICHAEL J. OHLER
ATHY A. O'KEEFFE
DAVID R. OWEN
JOHN PAPACHRISTOS
LUIS R. PENALVER
DEAN RINGEL
JAMES ROBINSON
THORN ROSENTHAL
TAMMY L. ROY
JONATHAN A. SCHAFFZIN
JOHN SCHUSTER
MICHAEL A. SHERMAN
DARREN SILVER

HOWARD G. SLOANE
JOSIAH M. SLOTNICK
RICHARD A. STIEGLITZ JR.
SUSANNA M. SUH
ANTHONY K. TAMA
JONATHAN D. THIER
JOHN A. TRIPODORO
GLENN J. WALDRIP, JR.
HERBERT S. WASHER
MICHAEL B. WEISS
S. PENNY WINDLE
COREY WRIGHT
DANIEL J. ZUBKOFF
ADAM ZUROFSKY

*ADMITTED IN DC ONLY

202-862-8950

July 29, 2013

VIA ECFS

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

Re: Notice of *Ex Parte* Presentation
Securus Petition for Declaratory Ruling - WC Docket No. 09-144
Rates for Interstate Inmate Calling Services - WC Docket No. 12-375

Dear Secretary Dortch:

On July 29, 2013, David Silverman, Senior Vice President and General Counsel of Global Tel*Link Corporation ("GTL"), and the undersigned met with Rebekah Goodheart, Acting Wireline Legal Advisor for Commissioner Clyburn, and Travis Litman, Assistant Division Chief, Telecommunications Access Policy Division, Wireline Competition Bureau, to discuss representations made by Millicorp in its July 12, 2013, *ex parte* presentation in WC Docket No. 09-144 and matters relating to inmate calling services ("ICS") rates under consideration in WC Docket No. 12-375.

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. It explained how its customer relationships define the parameters for inmate calling, including what calls are permissible for inmates to make in order to maintain public safety and security. In

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this respect, GTL highlighted the statements made by correctional facilities submitted in WC Docket No. 09-144 and attached to GTL's Reply comments filed September 2009. GTL also directed FCC Staff to the July 26, 2013 *ex parte* by Pay Tel Communications, Inc., filed in WC Docket No. 12-375, that addressed the fraud and security concerns associated with calls carried by certain alternative ICS providers. *Id.* at 2.

GTL also generally discussed matters pertaining to the *Rates for Interstate Inmate Calling Services* proceeding, including the July 10 Workshop, and the difficulty of applying a single interstate rate solution to a market that requires and demands individual case basis pricing. GTL explained how the selection of service components from numerous options by each correctional facility customer affects the cost of ICS. GTL further explained that because of the variety of options available and the varying needs of each correctional facility customer, pricing assumptions based on the size of a facility and the number of beds would ignore the economic realities of the ICS market.

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

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Cherie R. Kiser", written in a cursive style.

Chérie R. Kiser

Counsel to Global Tel*Link Corporation

cc (via e-mail): Rebekah Goodheart
Travis Litman