

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION**

**WASHINGTON, D.C.20554**

**NETWORK COMMUNICATIONS INTERNATIONAL CORP. \***  
**(“NCIC”)**

**\* WC Docket No. 12-375**  
**\* DA 13-1445**

**In Re: Rates for Interstate Inmate Calling Services and \***  
**Ancillary Fees**

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**REPLY COMMENTS ON NOTICE OF PROPOSED RULEMAKING**

**Network Communications International Corp.** (hereinafter “NCIC”) wishes to fervently demonstrate its plea that the Commission defer the decision to implement a lower, proposed interstate rate to jails, short-term holding facilities and short-term immigration detainment centers. It is fundamentally imperative that further analysis and consideration of security costs directly associated with providing short-term ICS are thoroughly exhausted prior to making a final order. Please consider the mental, physical and financial stress that will undoubtedly ensue within facilities/facility staff as massive arbitrage occurs, leading to substantial security risks, therefore forcing facilities to limit inmate calling due to insufficient time to take preventative measures.

NCIC specifically requests that the application of the imposed interstate rate structure for jails correspond with the action on the Future Notice of Proposed Rule Making (hereinafter “FNPRM”) and that the FNPRM be acted on within 180 days. Should the Commission address

ancillary fees, it is essential that a cost based payment structure be acceptable and that the administrative and security costs of ICS incurred by jails and short-term facilities be recoverable through a permissible recovery mechanism.

NCIC urges the Commission to fully consider all the information provided before coming to a decision in this Order.

Respectfully submitted,

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