

March 10, 2014

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

Re: Notice of *Ex Parte* Communication by CellAntenna Corporation
Regarding Promoting Technical Solutions to Combat Contraband
Wireless Device Use in Correctional Facilities - GN Docket 13-111

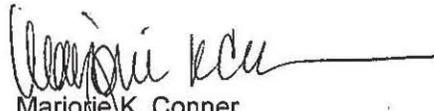
Dear Ms. Dortch:

In accordance with Section 1.1206 of the FCC's rules, 47 C.F.R. § 1.1206, CellAntenna Corporation ("CellAntenna"), by counsel, hereby advises you that its Chief Executive Officer, Howard Melamed, Bruce Buckley, also of CellAntenna, Todd Bertson of Dentons US LLP, and undersigned counsel met today, in person, with Louis Peraertz of Commissioner Clyburn's office.

During the visit, CellAntenna amplified, clarified, and updated information originally presented in the Petition for Rule Making and Reply Comments in the captioned proceeding. Specifically, CellAntenna emphasized the need for carrier cooperation in completing the tasks associated with eradicating contraband wireless devices from correctional facilities using CellAntenna's Guardian Service. CellAntenna shared the attached document with Mr. Peraertz.

Should questions arise in connection with this filing, please give me a call.

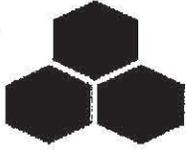
Very truly yours,



Marjorie K. Conner
Counsel to CellAntenna Corporation

Enclosure

cc (w/o enclosure): Louis Peraertz, Esq.
Howard Melamed



Controlling Contraband Wireless Devices in Correctional Facilities

- CellAntenna's Guardian Service is a system that identifies wireless devices ("Devices") being used in correctional facilities.
 - CellAntenna's Guardian technology is affordable for the smallest of prisons.
 - Inmates cannot evade detection by the Guardian Service.
 - The Guardian Service has been tested at a facility in cooperation with AT&T and does not cause interference.
 - In each "sweep", the Guardian Service identifies cell phones in the correctional facility and provides a list of cell phones, with sufficient information to identify the service provider.
- Some carriers are more cooperative than others.
- The FCC is considering whether to require carriers to disconnect cell phones reported as contraband in a prison in a pending rulemaking proceeding (GN Docket 13-111).
- Rather than a process that includes a "court order" process, CellAntenna supports adoption of a requirement that carriers deactivate cell phones, but allows ample discretion to verify and deactivate according to their informed judgment.
 - Discretion is appropriate because each carrier's fraud department is configured to meet the unique needs of the carrier, which need not be changed.
 - The FCC has a primary responsibility to "make available, so far as possible, to all people of the United States ... a ... wire and radio communication service ... for the purpose of promoting safety of life and property." 47 U.S.C. § 151
 - Title III of the Communications Act endows the FCC with expansive powers and a comprehensive mandate to encourage the larger and more effective use of radio *in the public interest*. See *Cellco Partnership v. F.C.C.*, 700 F. 3d 534 (D.C. Cir. 2012).
- FCC action is necessary because some carriers are not voluntarily acting on credible reports of the unlawful use of cell phones on their respective networks.