



MARCUS W. TRATHEN  
1600 WELLS FARGO CAPITOL CENTER  
150 FAYETTEVILLE STREET  
RALEIGH, NC 27601

T 919.839.0300  
F 919.839.0304  
MTRATHEN@BROOKSPIERCE.COM

July 10, 2014

***By Electronic Filing***

***Notice of Ex Parte Presentation***

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

***Re: WC Docket No. 12-375, Rates for Interstate Inmate Calling Services***

Dear Ms. Dortch:

On July 8, 2014, Vincent Townsend, President of Pay Tel Communications, Inc. (“Pay Tel”) and Marcus W. Trathen of Brooks, Pierce, McLendon, Humphrey & Leonard, LLP, met with Kalpak Gude, Lynne Engledow, Rhonda Lien, and David Zesiger of the Wireline Competition Bureau.

Pay Tel discussed its positions of record in this proceeding, including the need for clear direction from the FCC on the permissibility of paying commissions from interstate ICS revenues. Pay Tel discussed the confusion in the marketplace that has arisen over this issue and that some providers appear to be continuing to pay commissions from interstate revenues. Pay Tel also discussed the need for a comprehensive resolution to ICS reform, including preemption of below cost intrastate rate caps.

Please do not hesitate to contact the undersigned should any questions arise concerning this notice.

Sincerely yours,

/s/ Marcus W. Trathen  
Marcus W. Trathen

cc: Kalpak Gude (via email)  
Lynne Engledow (via email)  
David Zesiger (via email)  
Rhonda Lien (via email)