



N A R U C
National Association of Regulatory Utility Commissioners

NOTICE VIA ELECTRONIC FILING

July 21, 2014

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

RE: Notice of Oral Ex Parte filed in the proceedings captioned:
In the Matter of Rates for Instate Inmate Calling Services, WC Docket No. 12-375

Secretary Dortch:

On Sunday, July 15, 2014, the **South Dakota Commissioner Chris Nelson**, Chair of the Telecommunications Committee, of the National Association of Regulatory Utility Commissioners (NARUC) met with **FCC Commissioner Mignon Clyburn** and **Rebekah Goodheart**, Legal Advisor to Commissioner Clyburn, at the NARUC Summer Meetings in Dallas, Texas. During the course of the meeting there was a discussion of the FCC's open docket on Inmate Calling Services. Chair Nelson generally reiterated NARUC's on-the-record positions¹ [footnote 1] filed in the FCC's docketed proceedings that:

[1] Commend the FCC for acting expeditiously to address interstate inmate calling issues,

[2] Express our appreciation for [a] the original NPRM's acknowledgement that intrastate ISC rates are "set by the States,"

[3] Generally oppose arguments that would expand the FCC's jurisdiction to intrastate toll rates or unnecessarily supplant existing State Public Service Commission decisions over this service. Specifically, while we agree with NASUCA and others that the FCC's authority with respect to interstate interexchange calling is clear, the scope of the FCC's authority to address intrastate, long-distance calls and/or operator services is not.

¹ See. December 21, 2013 Comments of the National Association of Regulatory Utility Commissioners, filed in WC Docket 12-375, available online at: <http://apps.fcc.gov/ecfs/document/view?id=7520964307>. April 22, 2013 Reply Comments of the National Association of Regulatory Utility Commissioners, filed in WC Docket 12-375, available online at: <http://apps.fcc.gov/ecfs/document/view?id=7022289729>. December 28, 2012 Ex Parte Letter to the Honorable Juius Genachowski, Chairman, Federal Communications Commission, from James Bradford Ramsay, NARUC General Counsel in the Matter of the "Wright Petition" concerning Inmate calling rates filed in CC Docket No. 96-128, <http://apps.fcc.gov/ecfs/comment/view?id=6017155457>.

The undersigned was not present for this meeting. However, I have attempted to cover all the key advocacy points raised during the meeting. I am copying Ms. Goodheart with this notice. If she indicates I have inadvertently left out some advocacy, I will immediately refile a corrected notice that includes the omitted discussions. If you have questions about this or any other NARUC advocacy, please do not hesitate to contact me at 202.898.2207 (w), 202.257.0568(c) or at jramsay@naruc.org.

NARUC respectfully requests any waivers needed to file this ex parte out-of-time. If you have any questions about this or any other NARUC position, do not hesitate to contact the undersigned at 202.898.2207 or jramsay@naruc.org.

Respectfully Submitted,

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cc: Rebekah Goodheart, Wireline Legal Advisor to Commissioner Clyburn,