

KELLOGG, HUBER, HANSEN, TODD, EVANS & FIGEL, P.L.L.C.

SUMNER SQUARE
1615 M STREET, N.W.
SUITE 400
WASHINGTON, D.C. 20036-3209

(202) 326-7900

FACSIMILE:
(202) 326-7999

August 6, 2014

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

Re: Notice of Ex Parte Presentation - WC Docket No. 12-375

Dear Secretary Dortch:

On August 5, 2014, Aaron Panner and the undersigned of Kellogg, Huber, Hansen, Todd, Evans & Figel, PLLC met with David Gossett, Jacob M. Lewis, Sarah E. Citrin, Marcus Maher, and David Zesiger, along with Lynne Engledow (by phone), Kalpak Gude (by phone), Diane Griffin Holland (by phone), Rhonda Lien (by phone), and Richard Mallen (by phone), all of the Commission, to discuss matters relating to inmate calling services (“ICS”) and the Commission’s pending proceeding on interstate and intrastate ICS rates.

GTL presented its understanding of the existing legal framework germane to addressing the issues and proposals contained in the Federal Communications Commission’s (“FCC’s”) Report and Order and Further Notice of Proposed Rulemaking (“Order and FNPRM”). The focus of its presentation was the legal precedent addressing the FCC’s jurisdiction under Sections 201(b) and 276 of the Communications Act of 1934, as amended. 47 U.S.C. §§ 201(b) and 276.

Marlene H. Dortch
August 6, 2014
Page 2

Please contact me if you have any questions regarding this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael Kellogg", written in a cursive style.

Michael Kellogg
Counsel for Global Tel*Link Corporation

cc (via e-mail): Sarah E. Citrin
Lynne Engledow
David Gossett
Diane Griffin Holland
Kalpak Gude
Jacob M. Lewis
Rhonda Lien
Marcus Maher
Richard Mallen
David Zesiger