

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Rates for Interstate Inmate Calling Services	)	WC Docket No. 12-375
Commission Announces Inmate Calling Services	)	DA 14-829
Mandatory Data Due Date	)	
	)	

**MOTION FOR FURTHER EXTENSION OF TIME TO RESPOND TO  
ONE-TIME MANDATORY DATA COLLECTION**

On July 7, 2014, Inmate Calling Solutions, LLC (“ICSolutions”) filed a Motion for Extension of Time to Respond to One-Time Mandatory Data Collection (the “Original Extension Motion”) which principally requested to extend the deadline for responding to the one-time mandatory data collection by sixty (60) days, or until September 15, 2014. On July 11, 2014, the FCC released an Order revising the data collection response deadline to August 18, 2014 (the “Extension Order”).

ICSolutions appreciates the additional time granting in the FCC’s Extension Order and is making every effort to comply accordingly. However, the company has now spent considerable time in its effort to comply and has a much clearer perspective for what is needed in order to provide a thorough and accurate response. Accordingly, the company respectfully requests the full sixty days sought in its Original Extension Motion. In support of this request, ICSolutions fully incorporates herein the statements made in its Original Extension Motion and further states as follows:

1. The company simply lacks the accounting mechanisms and resources to properly comply with the data request in the time allotted and, absent the full extension as initially requested, its responses in this matter will be much less thorough and accurate than it would prefer to provide. The company also believes that the FCC’s proceeding, and the public interest, would be better served by the response quality

benefits that would be derived from the additional time.

2. As explained in its Original Extension Motion, ICSolutions replaced its accounting system and related processes in 2013, right in the middle of the period for which the data request applies, and neither its prior systems and processes nor the ones deployed today provide the data breakdowns being sought by the Commission. Therefore, compliance with this request will necessitate ICSolutions gathering, organizing, translating and reconciling detailed information across two different accounting systems. This may constitute a unique circumstance for ICSolutions and supports why the additional time extension is so important to ICSolutions even though other service providers may not require additional time.

Accordingly, and for the reasons set forth in the Original Extension Motion, ICSolutions respectfully requests that the Commission extend the deadline for responding to the one-time mandatory data collection until September 15, 2014.

Respectfully submitted,

**INMATE CALLING SOLUTIONS, LLC, by**

A handwritten signature in black ink, appearing to read "Ken Dawson", written over a horizontal line.

*Ken Dawson,  
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Dated: August 6, 2014