August 16, 2014

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

RE: Ex Parte Notice
Rates for Interstate Inmate Calling Services
WC Docket No. 12-375

Dear Ms. Dortch:

Pursuant to Section 1.1206(b) of the FCC’s rules, this notice is respectfully submitted to report a meeting between undersigned counsel for Martha Wright, et al. (the “Petitioners”) and Kalpak Gude, Lynne Engledow, Rhonda Lien, Michael Jacobs, and Rebekah Goodheart on August 14, 2014.

During the meeting, undersigned counsel discussed the recent submissions in this proceeding by ICS providers regarding further ICS reform. Undersigned counsel presented his views: (1) the FCC must eliminate Ancillary Fee payments; (2) Intrastate ICS rates must be capped to provide parity among all ICS calls; and (3) recent bidding by ICS providers reflects that they are still willing to pay commissions/kickbacks, with CenturyLink agreeing to pay 96% commission in Escambia County, Florida, and other ICS providers willing to pay between 83% and 95% of their gross revenues (see attached).

This willingness to pay commissions despite the adoption of an Interstate ICS rate cap in February 2014 is clear evidence that ICS providers have made the determination that they can continue to provide ICS services at a profit, despite turning over more than 80% of their gross revenue. As such, the FCC should focus on capping all ICS rates at the lowest possible level to protect the public from all excessive ICS rates.

Should there be any questions regarding this submission, please contact undersigned counsel.
cc (by/email):

Kalpak Gude
Lynne Engledow
Rhonda Lien
Michael Jacobs
Rebekah Goodheart

Respectfully submitted,

Lee G. Petro
DRINKER BIDDLE & REATH LLP
1500 K Street N.W., Suite 1100
Washington, DC 20005-1209
202-230-5857 – Telephone
202-842-8465 - Telecopier

Counsel for Martha Wright, et al.
## PUBLIC NOTICE OF RECOMMENDED AWARD

### BID TABULATION

| BID TABULATION | DESCRIPTION: Inmate Phone Service
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>BID # PD 13-14.064</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Bid Opening Time:</th>
<th>3:00 pm CDT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bid Opening Date:</td>
<td>08/6/2014</td>
</tr>
<tr>
<td>Bid Opening Location:</td>
<td>Rm 11,407</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>NAME OF BIDDER</th>
<th>Cover Sheet/Acknowledgement</th>
<th>Bid Bond or Check</th>
<th>Drug-Free Workplace Form</th>
<th>Information Sheet for Transactions &amp; Conveyances Corporation ID</th>
<th>Acknowledgement of Addenda</th>
<th>Sworn Statement Pursuant to Section 287.133(3)(a), FL Statutes on Entity Crimes</th>
<th>Total Percent on Gross Revenue</th>
</tr>
</thead>
<tbody>
<tr>
<td>Montgomery Technology Systems LLC</td>
<td>Y</td>
<td>Check</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>N</td>
<td>68%</td>
</tr>
<tr>
<td>Global TelLink Corporation</td>
<td>Y</td>
<td>Check</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td></td>
<td>95%</td>
</tr>
<tr>
<td>Legacy Inmate Communications</td>
<td>Y</td>
<td>Check</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td></td>
<td>83%</td>
</tr>
<tr>
<td>Securus Technologies</td>
<td>Y</td>
<td>Check</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td></td>
<td>88.15%</td>
</tr>
<tr>
<td>CenturyLink</td>
<td>Y</td>
<td>Bond</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td></td>
<td>96%</td>
</tr>
</tbody>
</table>

**AntTel**

Non-Responsive

**HIDS OPENED BY:**

Joe F. Pilkey, Jr., Purchasing Coordinator  DATE: 8/6/2014

**HIDS TABULATED BY:**

Lori Kistler, SOSA  DATE: 8/6/2014

**HIDS WITNESSED BY:**

Lori Kistler, SOSA  DATE: 8/6/2014

---

The Purchasing Chief/Designee recommends to the BCC: To award a Contract to [CenturyLink](#).

Pursuant to Section 119.07(3)(M), F.S., all documents relating to this tabulation are available for public inspection and copying at the office of the Purchasing Manager.

Posted @ 4:30 p.m. CDT on 08/12/2014

[Signature]