

Law Offices

August 16, 2014

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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.

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Marlene H. Dortch, Secretary

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Respectfully submitted,



Lee G. Petro

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Counsel for Martha Wright, et al.

cc (by/email):

Kalpak Gude
Lynne Engledow
Rhonda Lien
Michael Jacobs
Rebekah Goodheart

PUBLIC NOTICE OF RECOMMENDED AWARD

DESCRIPTION: Inmate Phone Service BID # PD 13-14,064									
BID TABULATION	Cover Sheet/ Acknowledgement	Bid Bond or Check	Drug-Free Workplace Form	Information Sheet for Transactions & Conveyances Corporation ID	Acknowledgement of Addenda	Sworn Statement Pursuant to Section 287.13(3)(a), FL Statutes on Entity Crimes	Total Percent on Gross Revenue		
Bid Opening Time: 3:00 pm CDT Bid Opening Date: 08/06/2014 Bid Opening Location: Rm 11 407									
NAME OF BIDDER									
Montgomery Technology Systems LLC	Y	Check	Y	Y	N	N	68%		
Global Tel Link Corporation	Y	Check	Y	Y	Y	Y	95%		
Legacy Inmate Communications	Y	Check	Y	Y	Y	Y	83%		
Securus Technologies	Y	Check	Y	Y	Y	Y	88.1%		
CenturyLink	Y	Bond	Y	Y	Y	Y	96%		
AmTel									
BIDS OPENED BY:	Non-Responsive								
BIDS TABULATED BY:	Joe F. Pillitary, Jr., Purchasing Coordinator DATE: 8/6/2014								
BIDS WITNESSED BY:	Lori Kistler, SOSA DATE: 8/6/2014								
	CAR DATE: 9/4/2014			BOCC DATE: 9/4/2014					

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

JFP/JS
