

July 29, 2016

VIA ECFS

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

**Stephanie A. Joyce**

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Re: Notice of Permitted *Ex Parte* Meeting, WC Docket No. 12-375

Dear Ms. Dortch:

On July 28, 2016, Securus Technologies, Inc. (“Securus”), represented by Vice President and General Counsel Dennis J. Reinhold, Andrew J. Lipman, and the undersigned counsel, met with Claude Aiken, Wireline Legal Advisor to Commissioner Mignon Clyburn, Stephanie Weiner, Senior Legal Advisor to Chairman Tom Wheeler, and Madeleine Findley, Deputy Chief of the Wireline Competition Bureau, to discuss the Fact Sheet released in the above-named docket on July 24, 2016.<sup>1</sup>

Securus stated that the Fact Sheet suggests that the Commission is acting on the Petition for Partial Reconsideration filed January 19, 2016, by Michael S. Hamden (“Hamden Petition”) but actually is not granting any of the relief that Mr. Hamden requested. The additional \$0.02 to \$0.09 that the Fact Sheet has added to the Inmate Calling Services (“ICS”) rates adopted in the *Second Report and Order*<sup>2</sup> are not the “modest, mandated cost-recovery mechanism”<sup>3</sup> that he envisioned. As such, the forthcoming order does not resolve the many infirmities of the new ICS rates. Securus noted that Mr. Lipman has addressed the jurisdictional issues extensively in prior filings.<sup>4</sup>

This disclosure is made in compliance with 47 C.F.R. § 1.1206(a)(1).

Please do not hesitate to contact me with any questions: 202.857.6081.

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<sup>1</sup> Fact Sheet, *Providing Affordable, Sustainable Inmate Calling Services* (July 14, 2016), available at <https://www.fcc.gov/document/providing-affordable-sustainable-inmate-calling-services>.

<sup>2</sup> WC Docket No. 12-375, *Second Report and Order and Third Further Notice of Proposed Rulemaking*, FCC 15-136 (rel. Nov. 5, 2015).

<sup>3</sup> Hamden Petition at ii.

<sup>4</sup> WC Docket No. 12-375, Letter from Andrew D. Lipman to Marlene H. Dortch, FCC, at 2-3 (May 1, 2015); Letter from Andrew D. Lipman to Marlene H. Dortch, FCC, at 1-7 (Apr. 8, 2015).

**Arent Fox**

Sincerely,

s/Stephanie A. Joyce

*Counsel to Securus Technologies, Inc.*

Cc: Stephanie Weiner, Senior Legal Advisor to Chairman Wheeler  
Claude Aiken, Legal Advisor to Commissioner Clyburn  
Madeleine Findley, Deputy Chief, Wireline Competition Bureau  
*(All via electronic mail)*