



Human Rights Defense Center

DEDICATED TO PROTECTING HUMAN RIGHTS

June 22, 2016

Submitted Online Only

The Honorable Tom Wheeler, Chairman
Federal Communications Commission
445 12th St. S.W.
Washington, DC 20554

Re: Comment for WC Docket 12-375

Dear Chairman Wheeler:

The Human Rights Defense Center (HRDC) respectfully submits this comment in response to the Federal Communications Commission's (FCC or the Commission) Request for Comment on Global Tel*Link Corporation's (GTL) Petition for Waiver of Deadline to Implement Rules 64.6080 and 64.6090 for Jails, WC Docket No. 12-375.

While we recognize the deadline for public comment regarding GTL's Petition for Waiver has passed, we want to make the Commission aware of a Press Release issued by GTL in which it "commends its customers" whose work "has ensured compliance with the new FCC rules on terms tailored to meet the unique needs and interests of each individual facility." Note that GTL states in its press release "GTL... announced it has **completed implementation** of the rate and fee changes..." (**Attachment 1**) This document begs the question of why GTL has expended so much in the way of public and private resources in pursuing what is clearly an unnecessary waiver request and why they haven't moved to withdraw the petition. If they have completed implementation of the FCC rates why are they seeking a waiver if not to be able to continue gouging the public and exploiting the poor as they have for decades? We reiterate our position that GTL's request for a waiver should be denied.

Thank you for your time and attention to this matter.

Respectfully submitted,

Paul Wright
Executive Director, HRDC

Attachment

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Attachment 1



GTL Commends Its Customers as ICS Marketplace Implements New FCC Rules for Jails

After implementation of rules for correctional facilities in March, GTL worked side by side with its county and municipal partners to meet the FCC's final deadline on terms best suited to each community

Jun 20, 2016, 11:56 ET from GTL (<http://www.prnewswire.com/news/gtl>)



RESTON, Va., June 20, 2016 /PRNewswire-USNewswire/ -- Global Tel*Link (GTL), the leading provider of correctional technology solutions and an innovator in payment services solutions for government agencies, announced it has completed implementation of rate and fee changes affecting inmate calling services (ICS) for millions of inmates and their friends and families. Through these efforts, GTL has complied with new Federal Communications Commission (FCC) rules for ICS, which go into effect today nationwide for jail facilities, typically operated by county sheriff's departments and municipal police.

GTL credits the engagement and leadership of law enforcement and state and county governments across the country who have worked in partnership with GTL during the past six months to negotiate revised ICS agreements. This initiative, including implementation for state correctional facilities in March, has ensured compliance with the new FCC rules on terms tailored to meet the unique needs and interests of each individual facility.

"We appreciate the courage and leadership demonstrated by law enforcement and state and county governments across the nation in making difficult choices about the provision of ICS in their facilities," said GTL CEO Brian Oliver. "These local leaders have had to balance the interests of providing the highest level of

security while seeking to meet the FCC's goal of providing affordable service to inmates, friends and families. We appreciate our customers' trust in GTL to help them get to a solution that was the best fit for their communities."

Elements of the FCC's new rules, including the portion seeking to cap rates on intrastate ICS, were stayed by the U.S. Court of Appeals in Washington, D.C., earlier this spring. That case is unlikely to be resolved until next year.

"There is still much to be resolved at the FCC, in the courts and in the marketplace," said Oliver. "Regardless, GTL will continue to work as a trusted partner with our customers to navigate this process together." (See: GTL's **Inmate Phone Facts**)

About Global Tel*Link

GTL is the leading provider of integrated correctional technology solutions, delivering financial value, security, and ease of operation to our customers through visionary products and solutions at the forefront of corrections innovation. As a trusted correctional industry leader, GTL provides service to approximately fifty percent of inmates nationwide, including service to 33 state departments of corrections, the District of Columbia, Puerto Rico, and 32 of the largest city/county facilities. GTL is headquartered in Reston, Virginia, with more than 10 regional offices across the country. To find out more about GTL, please visit our website www.gtl.net. You can also view us on Facebook, Twitter or LinkedIn.

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