October 21, 2015

By Electronic Filing

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

Re: WC Docket No. 12-375, Inmate Calling Service Dear Ms. Dortch:

Dear Ms. Dortch:

In order for correctional facilities and regulatory bodies to reconcile Inmate Telephone Companies' Total Gross Revenue, which includes all unedited billed rates and fees, it is critical that these agencies are provided access to online (real-time) raw call detail records. It is imperative that this information not be proprietary to the Inmate Telephone Companies. Also, it is critical that each Inmate Telephone Company provide all records on a facility-by-facility basis rather than an Inmate Telephone Company's combined revenue. Otherwise, accurate reconciliation is impossible.

Respectfully submitted,

Secured Perimeters International
Karen Doss-Harbison
Debbie Bell Arena
Ben Mercier
Paul Moses

cc (via email):
Commissioner Mignon Clyburn
Lynne Engledow
Chanelle Hardy