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\* ADMITTED AS A SOLICITOR  
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October 9, 2020

**Via ECFS and IBFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Notice of Oral *Ex-Parte* Presentation**  
**WC Docket No. 20-207**  
**WC Docket No. 20-218**  
**IB File No. ITC-ASG-20200629-00101**  
**IB File No. ITC-ASG-20200708-00112**

Dear Secretary Dortch:

On October 8, 2020, in response to a request from Commission staff, representatives of Global Tel\*Link Corporation (“GTL”) and Legacy Long Distance International, Inc. d/b/a Legacy Inmate Communications (“Legacy”) (collectively, the “Applicants”) spoke via telephone with Terri Natoli, Associate Bureau Chief of the Wireline Competition Bureau, and Pamela Arluk, Division Chief, Elizabeth Drogula, Special Counsel, and Benjamin (Jesse) Goodwin, Attorney Advisor, all in the Competition Policy Division of the Wireline Competition Bureau, regarding the Joint Applications filed in the above-referenced dockets. The undersigned participated on the call on behalf of GTL, and Brian Hill, Chief Executive Officer of Legacy, and Sharon Warren with Inteserra Consulting Group participated on behalf of Legacy.

The Joint Applications seek Commission approval to assign and/or transfer control of certain Legacy customers/contracts to either GTL or to Network Communications International Corp. (“NCIC”) depending on the correctional facility at issue (collectively, the “Transactions”). In response to staff questions, the Applicants explained the Transactions are intended to facilitate Legacy’s exit from the inmate calling services (“ICS”) market. As previously noted in the above-

referenced dockets<sup>1</sup> and reflected in Legacy's Application to Discontinue Service filed with the Commission on February 18, 2020,<sup>2</sup> Legacy will discontinue the provision of all telecommunications services in the United States. On the call, Legacy explained that it has given customers notice and intends to exit the market no later than November 15, 2020.

The Applicants explained that approval of the Transactions will ensure there is no disruption of service to Legacy's existing correctional facility customers or to end users of ICS as a result of Legacy's exit from the market. The Applicants described the steps they have already taken to ensure a smooth transition of service, and urged the Commission to act quickly on the Joint Applications, as additional time is needed after Commission approval to transition fully the contracts and underlying technical operations to either GTL or NCIC prior to Legacy's market exit. The Applicants also noted that many of Legacy's existing correctional facility customers are waiting for Commission action on the Joint Applications before formally giving their consent to assign the contracts, which is necessary to complete the transition of ICS to the new providers under the respective Joint Applications between Legacy and GTL and Legacy and NCIC.

Commission staff also asked additional questions regarding the history of the Transactions, the contracts to be transferred, and whether any ICS existing contract rate changes would occur as a result of the Transactions. The Applicants committed to providing the requested additional information as a supplement to their respective Joint Applications.

If you have any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

*/s/ Chérie R. Kiser*

Chérie R. Kiser  
Angela F. Collins

Counsel for Global Tel\*Link Corporation

cc: Terri Natoli, Associate Bureau Chief, Wireline Competition Bureau  
Pamela Arluk, Division Chief, Competition Policy Division, Wireline Competition Bureau

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<sup>1</sup> See, e.g., GTL-Legacy Joint Application at 10 (filed July 8, 2020) ("Legacy is in the process of discontinuing or cancelling its authorization to provide telecommunications service in the states."); NCIC-Legacy Supplement at 1 (filed July 30, 2020) ("After this transaction is approved, Legacy will have a few remaining direct customer contracts they will be providing service to. These are set to expire before the end of the year. At that time the Company will finalize their withdrawal from these states.").

<sup>2</sup> WC Docket No. 20-52, Section 63.71 Application of Legacy Long Distance International, Inc. (filed Feb. 18, 2020); see also DA 20-274, *Comments Invited on Section 214 Application(s) to Discontinue Domestic Non-Dominant Carrier Telecommunications and/or Interconnected VoIP Services*, Public Notice (rel. Mar. 13, 2020) (stating Legacy could discontinue service on or after April 13, 2020).

Elizabeth Drogula, Special Counsel, Competition Policy Division, Wireline Competition Bureau  
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