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JUN 15 2017

**EXECUTIVE SECRETARY
G.P.S.C.**

ORIGINAL

DOCKET# 18870
DOCUMENT# 168639

June 14, 2017

Reece McAlister
Secretary
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, Georgia 30334-5701

**In Re: Institutional Telecommunications Services – Docket No. 18870 – Comments on the Order
Modifying Rates for Institutional Telecommunications Services**

Opposition to Limitations on Payments to Jails

NCIC Inmate Phone Service (NCIC) requests the Georgia Public Service Commission remove the limitation on payments to jails based on the fact that the FCC also chose not to cap commissions as it was out of their jurisdiction. The Ga PSC does not have authorization to regulate contracts or commission payments and will therefore jeopardize their ruling.

The rate and fee caps that the PSC is imposing are fair and reasonable, plus they are in line with rate caps imposed states, however the capping of commission payments will result in improper encroachment into intrastate commerce. Further, each county jail has a completely different cost structure in offering inmate phone services and, often, with remote jails who service their own phones will not be able to offset their costs with these limitations. It also decreases the need for inmate phone providers to be efficient, as it puts a limit on competitive pressures.

Sincerely,

William L. Pope
President
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