

Ruth Nettles

060476-TL

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Sent: Tuesday, September 01, 2009 3:54 PM
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Subject: Comments of Network Communications International Corp.; Docket Number 060476-TL
Attachments: NCIC Comments - DN.060476-TL.pdf

In accordance with the electronic filing procedures of the Florida Public Service Commission, the following filing is made:

A. The name, address, telephone number and email for the person responsible for the filing is:

Robin Norton, Consultant to Network Communications International Corp.
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B. This filing is made in Docket No. 060476-TL

C. The document is filed on behalf of Network Communications International Corp.

D. The total pages in the attached document is one (1)

E. The attached document is Comments of Network Communications International Corp.

Thank you,

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*Done
 9/1/09
 R-V.N.*

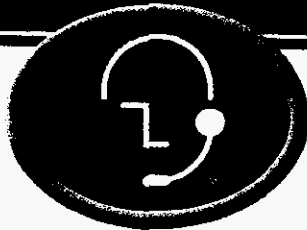
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About TMI - Technologies Management, Inc. ("TMI"), serving the telecom industry since 1986, offers consulting services on regulatory compliance and competitive developments in the telecommunications industry.

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9/1/2009

DOCUMENT NUMBER-DATE
 09102 SEP-18
 FPSC-COMMISSION CLERK



NCIC Operator Services

September 1, 2009

Ms. Ann Cole, Commission Clerk
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: WC Docket No. 060476-TL, Petition to Initiate Rulemaking to amend Rules 25-24.630(1) and 25-24.516(1)

Dear Ms. Cole:

Network Communications International Corp (NCIC) hereby submits this letter in response to Staff's request for comments issued August 6, 2009 in the above referenced proceeding. The Florida Legislature removed the Commission's authority to impose rate caps with the passage of Senate Bill 2626, which became law on July 1, 2009.

NCIC is an institutional telecommunications operator service provider, certificated as a telecommunications carrier in the state of Florida on November 13, 1998 per Order PSC-98-1497-FOF-TI in Docket Number 981254-TI (Certificate No. 5753). NCIC has provided operator services for over 13 years and is heavily invested in the inmate industry by serving hundreds of facilities across the nation. NCIC suggests that if the Commission believes that rate regulation is in the public interest it should take the issue up with the Legislature to revise the law to grant the Commission rate jurisdiction over institutional service providers. In that event, NCIC recommends that all approved rate caps, surcharges and fees such as the Bill Statement Fee/Bill Rendering Fee, Biometric Fees et al be clearly defined in any such future rules.

Respectfully submitted,

Network Communications International Corp. (NCIC)

By

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