



October 6, 2017

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

**Re: American Jail Association Comments on Contraband Cell
Phones in Jails, GN Docket No. 13-111; FCC 17-25**

Dear Secretary Dortch:

The American Jail Association (AJA) hereby submits these comments in response to the FCC's request for information regarding contraband cell phones in correctional facilities and requests that you record them in the official record and circulate them to the Chairman and Commissioners.

AJA is the National Voice for Local Corrections -- a not-for-profit professional organization that supports corrections professionals, develops professional standards and training, and works to improve conditions and systems where people are detained and serving sentences. Formed over 35 years ago, AJA represents approximately 4,000 members across the nation. We support our mission through our website, conferences, training workshops and publishing. Our magazine, *American Jails*, is distributed to every jail in America.

AJA congratulates the FCC for addressing one of the major crises in jail operations and in public safety in general, the proliferation of contraband cell phones in jails and detention facilities. The compact nature and mobility of cell phones, SIM cards, batteries and chargers make them easy to conceal, simple to smuggle, hard to find and almost impossible to keep out of jails. Once in a jail, these phones become powerful and dangerous tools for crime, gang activity, drug trade and violence against jail personnel, other detainees and the general public outside the confines of the facility.

This public safety crisis came about through technology, and AJA looks to the FCC to find a technological solution to solve it. Anyone who views the

contraband cell phone crisis as purely a jail problem is not clearly seeing how technology has enabled criminals nor are they recognizing the incredible danger not only to our members, but to members of the general public who perhaps don't even know where the closest jail is.

AJA endorses the solutions adopted by the American Corrections Association in its Comments to the FCC in this proceeding, filed on June 23, 2017, its stated requirements for a technological solution and its finding that beacon technology meets all of those requirements.


We are particularly interested in the requirement that the cell phone will be rendered useless, not only calls and texts, but also for the camera, recording functions and all apps. Such a feature greatly reduces the danger to our members by limiting the interaction with detainees and prisoners to search for and confiscate cell phones.

The requirement for a low cost solution is equally important. Jails across the U.S. cannot afford high cost solutions. Jails cannot afford solutions that require lots of jail personnel time be have a solution that is effective. Rendering the phone useless means that jail personnel would not even have to search or remove it, lessening the potential for injury.

We know that the FCC has a process, but we encourage the FCC to treat this problem as the emergency that it is. We need action urgently.

AJA strongly urges the FCC to adopt beacon technology as the solution for defeating contraband wireless devices in jails as a matter of public safety and for the purposes of nationwide availability, compatibility and interoperability. Additionally the FCC should develop a voluntary program for the establishment of beacon technology with all of the wireless carriers within one year, adopting rules if carriers cannot promptly agree on a voluntary program.

Respectfully submitted,

A handwritten signature in black ink, reading "Robert J. Kasabian". The signature is written in a cursive, flowing style.

Robert J. Kasabian
Executive Director