

CONFIDENTIAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)
) CC Docket 92-77
Billed Party Preference)
For 0+ InterLATA Calls)

RHODE ISLAND DEPARTMENT OF CORRECTIONS

George A. Vose, Jr., Director - Rhode Island Department of Corrections, in opposition to enactment of Billed Party Preference (BPP) because of the threat to the security of the Rhode Island Department of Corrections that will occur if BPP is enacted.

At the present time, the Rhode Island Department of Corrections is in the process of studying the inmate collect calling system currently in use. We wish to add security features to control inmate telephone calls, eliminate fraud and abuse currently going on, deny inmates the use of the telephone as a weapon to use against prison authorities, and develop the inmate calling system as an intelligence tool. If BPP is enacted, we will not be able to accomplish our goals and we will have to eliminate inmate access to telephones and require inmates to communicate with the outside world by mail.

My specific objections to enactment of BPP are as follows:

- 1. BPP will undermine R.I.D.O.C. ability to control inmate calling.

As a correctional facility administrator, I am in the best position to evaluate what call controls are necessary and in the best interest of inmates and the general public--not the federal government. Telephone call controls are necessary in order to prevent abuse and fraud. If the Commission wishes, R.I.D.O.C. can document specific cases, especially gang related cases where the telephone is being used to empower inmates and gang members. Call abuse and fraud at correctional facilities are worse than at non-inmate locations! Inmates have 24 hours a day, all year, to try to beat the administration and call abuse is easy for them, especially if multiple providers are involved.

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BPP will, in effect, grant every inmate at my facilities a new federal right to use the long distance carrier of his choice. As the guardian of that inmate, I will no longer have control over how inmate calls are routed. Under BPP, inmates could conceivably harass judges, witnesses and jury members involved in their convictions-
-or even the victims of their crimes! Allowing inmate calls to go to any long distance carrier, as opposed to a service provider chosen by me and contractually committed to provide call and fraud controls, will threaten security. It is necessary to have a service provider with whom I am in daily contact, one who can service my needs by installing number blocking, PINS, screening out calls to persons inmates wish to threaten, and eliminating a primary avenue of gang control inside the walls. I vigorously oppose any federal interference with my ability to manage and control inmates' calling.

- 2. BPP will eliminate current revenue-sharing arrangements that fund important inmate programs and create new financial burdens for R.I.D.O.C.**

The realities of prison and jail funding dictate that a cooperative effort with a inmate phone provider who provides the sophisticated inmate calling systems required be established, as there is no way R.I.D.O.C. could afford to provide such a system from State monies. The revenue-sharing arrangements with a inmate phone provider have been an innovative and effective means of

financing important inmate programs, such as family visitation, education, drug rehabilitation programs, law libraries, and sports. Increased phone availability and inmate programs financed through revenue-sharing have brought R.I.D.O.C. inmates improved morale, rehabilitation and reduced recidivism.

Facility administrators cannot independently finance sophisticated inmate calling equipment through the general budget. The public and legislators do not want to provide amenities for inmates.

Enactment of BPP will significantly impact the revenue-sharing arrangements. Successful programs and rehabilitation efforts will be cancelled if BPP is enacted. As a prison administrator, I am sensitive to the cost of collect calls to inmate families and only use revenue-sharing arrangements for necessary programs that benefit inmates. All revenue generated by inmate collect calls is used exclusively for the benefit of inmates.

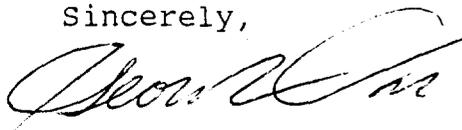
In short, I oppose any federal effort that infringes on my ability to provide inmates an effective phone system and fund other important inmate programs. At a time of fiscal crisis in government, the FCC should not be cutting off a critical source of revenue that benefits inmates.

3. BPP is not the way to ensure reasonable rates for inmate calling.

R.I.D.O.C. is sensitive to the rates that inmate families pay for calls. It is important for the FCC to understand that correctional facilities can only contract with inmate phone providers that charge reasonable and sensible calling rates because, otherwise, the families will not accept the inmates' calls. Enactment of BPP will serve to frustrate and anger inmates in addition to depriving R.I.D.O.C. of the revenue necessary to pay for important inmate programs. Competition among providers is so great that any provider trying to charge unreasonable rates cannot survive.

I oppose BPP. I consider it a complex federal effort that would effectively strip me of my responsibility over the welfare of inmates, and would be a more complex, costly and ineffective way of handling rate monitoring. Enactment of BPP will end inmate use of the telephone as far as I am concerned. If BPP is instituted, the danger to society of letting inmates control the collect calling system instead of the administration is just too great a threat to allow inmates access to telephones.

Sincerely,



George A. Vose, Jr.
Director
R.I. Department of Corrections
40 Howard Avenue
Cranston, RI 02920