

DAYLE JAMES
Sheriff



WAYNE SPEARS
Undersheriff

BARBARA GIFFORD
Office Manager

August 1, 1994

RECEIVED

AUG - 3 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

The Honorable Andrew C. Barrett
Federal Communications Commission
1919 M Street NW
Washington, D.C. 20554

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Chairman Hundt:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, non of whom will have any obligation to us, and few that will be trained to handle inmate calls.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. the resulting increase in tension will make it more difficult for our staff to manage inmates.

Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective

D.A.R.E. TO KEEP KIDS
OFF DRUGS

OKMULGEE COUNTY COURTHOUSE
Okmulgee, Oklahoma 74447
Office: 918/756-4311
Fax: 918/758-1208

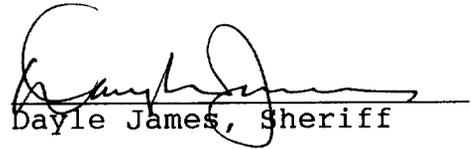
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action would be to adopt rate ceilings on inmate calls and then let sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our Administrative and security decisions--decisions that are clearly within our discretion and which we have public responsibility to make.

Respectfully submitted,



Dayle James, Sheriff

Okmulgee County Sheriff's
Office
314 West 7th
Okmulgee, Ok 74447

(918) 756-4311



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AUG 01 1994

Carl R. Griffith, Jr. SHERIFF, JEFFERSON COUNTY, TEXAS
OFFICE OF COMMISSIONER RACHELLE B. CHONG

Deputy Chiefs
Kenneth A. Duhon - Law Enforcement & Employee Relations
Harry Lewis - Detention & Legal Advisor

RECEIVED
P. O. Box 2950
Beaumont, Texas 77704
(409) 835-8441

AUG 3 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

July 28, 1994

The Honorable Rachelle B. Chong
Federal Communications Commission
1919 M Street, NW
Washington, D. C. 20551

Re: 92-051-1, No. 92-7, Opposition to Billed Party Preference
from Chairman Hundt.

As an opponent to the application of Billed Party Preference (BPP) at inmate facilities:

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single provider that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers and we will have an obligation to no longer have that will be required to handle inmate calls.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abuse of calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we face and the cost of this equipment, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also prevent us from receiving the financial help from inmate phones. If BPP is applied to inmate facilities, there will be no way for us to obtain these phone services from inmate phone service providers to assist us. Without inmate phones, the morale of our staff will be devastated. The resulting increase in tension will not do more to help our staff to manage inmates.

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Page 2
July 28, 1994

The inmate phone system also allows us to block certain telephone numbers from being called from the facility over the inmate phone lines. This is important when an inmate obtains the phone numbers of witnesses, victims or victim's relatives, and makes threats and harassing telephone calls.

Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceiling on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions--decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,



Harry Lewis
Deputy Chief
Jefferson County Sheriff Department
P. O. Box 2950
Beaumont, Texas 77701

DAYLE JAMES
Sheriff



RECEIVED

AUG 3 1994

WAYNE SPEARS
Undersheriff

FEDERAL COMMUNICATIONS COMMISSION **BARBARA GIFFORD**
OFFICE OF SECRETARY Office Manager

August 1, 1994

RECEIVED

The Honorable Rachelle B. Chong
Federal Communications Commission
1919 M Street NW
Washington, D.C. 20554

AUG 01 1994

OFFICE OF
COMMISSIONER RACHELLE B. CHONG

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Chairman Hundt:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, non of whom will have any obligation to us, and few that will be trained to handle inmate calls.

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D.A.R.E. TO KEEP KIDS
OFF DRUGS

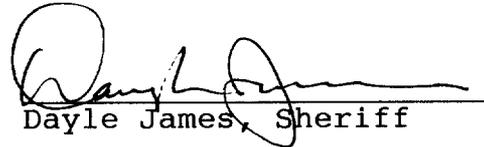
OKMULGEE COUNTY COURTHOUSE
Okmulgee, Oklahoma 74447
Office: 918/756-4311
Fax: 918/758-1208

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In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our Administrative and security decisions--decisions that are clearly within our discretion and which we have public responsibility to make.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dayle James", is written over a horizontal line. The signature is fluid and cursive.

Dayle James, Sheriff
Okmulgee County Sheriff's
Office
314 West 7th
Okmulgee, Ok 74447

(918) 756-4311



AUG - 3 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY



Office of the Sheriff

Dougherty County, Georgia

Jamil Saba, Sheriff

P.O. Box 1827, Albany, Georgia 31703

Telephone (912) 436-1561

GA 047000



RECEIVED

AUG 01 1994

OFFICE OF
COMMISSIONER RACHELLE B. CHONG

July 25, 1994

The Honorable Rachele B. Chong
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Ms. Chong:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

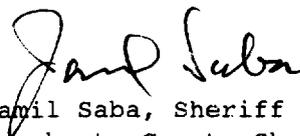
The Billed Party Preference will do nothing more than undermine our ability to control all inmates in our facility. If you approve BPP, you will take away all established tools incorporated in the phone system to accomplish the below listed issues:

- A) Victim and witness harassment prevention by inmates;
- B) Facility personnel supervision of phone usage;
- C) Phone number blocking capability;
- D) Call duration capability;
- E) Call monitoring and recording capabilities;
- F) Inmate phone commissions;
- G) Collect-only system capability; and
- H) Reduced budgetary costs due to not having to pay for inmate calls.

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In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions--decisions that are clearly within our discretion and which we have a public responsibility to make.

Yours for better Law Enforcement,

A handwritten signature in black ink that reads "Jamil Saba". The signature is written in a cursive, slightly slanted style.

Jamil Saba, Sheriff
Dougherty County Sheriff's Office
225 Pine Avenue
Albany, Georgia 31702

cc: Vice President Al Gore
Senator Paul Coverdell
Senator Sam Nunn
Congressman Sanford Bishop



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AUG 3 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY



Office of the Sheriff

Dougherty County, Georgia

Jamil Saba, Sheriff

P.O. Box 1827, Albany, Georgia 31703

Telephone (912) 436-1561

GA 0470000



July 25, 1994

The Honorable Andrew C. Barrett
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Mr. Barrett:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

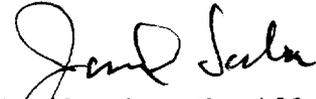
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- B) Facility personnel supervision of phone usage;
- C) Phone number blocking capability;
- D) Call duration capability;
- E) Call monitoring and recording capabilities;
- F) Inmate phone commissions;
- G) Collect-only system capability; and
- H) Reduced budgetary costs due to not having to pay for inmate calls.

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In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions--decisions that are clearly within our discretion and which we have a public responsibility to make.

Yours for better Law Enforcement,

A handwritten signature in black ink that reads "Jamil Saba". The signature is written in a cursive, flowing style.

Jamil Saba, Sheriff
Dougherty County Sheriff's Office
225 Pine Avenue
Albany, Georgia 31702

cc: Vice President Al Gore
Senator Paul Coverdell
Senator Sam Nunn
Congressman Sanford Bishop



J. Al Cannon, Jr., Esq.
 SHERIFF, CHARLESTON COUNTY
 3505 Pinhaven Drive
 Charleston Heights, SC 29405-7789
 (803) 554-4700
 FAX# 554-9744

Charleston County Sheriff's Office
Charleston, South Carolina
Detention Bureau



Chief Deputy L.J. Hanson
 DETENTION BUREAU ADMINISTRATOR
 3883 Leeds Avenue
 Charleston, SC 29405-7482
 (803) 745-2303
 FAX# 745-2256

July 28, 1994

The Honorable Rachelle B. Chong
 Federal Communications Commission
 1919 M Street, NW
 Washington, D.C. 20554

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 AUG 01 1994
 OFFICE OF
 COMMISSIONER RACHELLE B. CHONG
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 FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF SECRETARY

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

The Honorable Rachelle B. Chong:

We are opposed to the application of Billed Preference (BPP) at inmate facilities.

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

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Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adapt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to acquiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions, decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,

Lorna J. Hanson

Lorna J. Hanson
Chief Deputy Detention Administrator
Charleston County Detention Bureau
8885 Leeds Avenue
Charleston, South Carolina 29405



THE PRISON BOARD

Jack F. Dunmire, Chairman
Robert A. Cimpinski Joseph A. Nickleach
James V. Scahill George R. Kepple
Larry R. Crawford Darlene J. Pike

WILLIAM J. LAUGHNER
WARDEN

COUNTY JAIL
COUNTY OF ARMSTRONG

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August 1, 1994

AUG - 3 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20544

RE: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Chairman Hundt:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

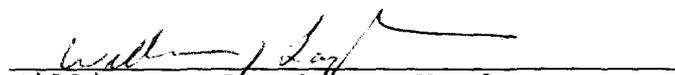
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In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions -- decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,



William J. Laughner, Warden

Armstrong County Jail
East Market Street
Kittanning, PA 16201



23860

Paul R. Nicholson

SHERIFF

City of Hopewell Virginia

OFFICE OF THE SHERIFF

P.O. BOX 1193

HOPEWELL, VA 23860

(804) 541-2300



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AUG - 3 1994

MEMBER OF VIRGINIA
STATE SHERIFF'S ASSN.

JULY 27, 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

The Honorable James H. Quello
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

Re: CC Docket No.92-77 Opposition to Billed Party Preference

Dear Commissioner Quello:

WE ARE OPPOSED TO THE APPLICATION OF BILLED PARTY PREFERENCE (BPP) AT INMATE FACILITIES.

We have analyzed the security and administration needs at our facility, the **Hopewell City Jail**, and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and a few that will be trained to handle inmate calls. We see our Inmate Phone Technician "Bob Mitchell" three times a week when he comes by our facility. Bob drops by to update the equipment or just to besure everything is operating smooth. Bob has become a friend of ours and he knows our needs.

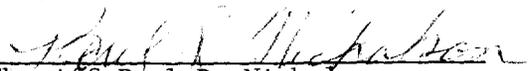
We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls and other criminal activity over the telephone network. We just had our equipment installed in the last year. Before the equipment was installed we were receiving complaints from citizens through out the state who were receiving unwanted phone calls from our inmates. Before a murder trial a key witness for the state received threatening phone calls, believed to have been made by inmate(s) incarcerated in our facility. We have seen phone bills coming to inmates for \$1,000.00's where they had used thier or a stolen Calling Card. In some instances one of the inmates would get a calling card number and pass it through out the facility. With the Inmate Phone System we have now, we are able to stop all of these problems and more if they should arise. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us like Bob Mitchell does. Without inmate phone the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

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Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable. Our facility has not received any complaints from the inmate's family due to the cost.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions --- decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,


Sheriff Paul R. Nicholson

MURRAY COUNTY SHERIFF OFFICE
SULPHUR, OK. 73086
(405) 622-5124

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AUG 3 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

July 29, 1994

The Honorable Andrew C. Barrett
Federal Communications Commission
1919 M Street, NW
Washington, D. C. 20554

RE: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Commissioner Barrett

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

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In short, BPP would take away our ability to employ important

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security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security..

Respectfully,

A handwritten signature in cursive script that reads "EM Bristol". The signature is written in black ink and is positioned between the word "Respectfully," and the typed name "Sheriff E. M. Bristol".

Sheriff E. M. Bristol

July 27, 1994

RECEIVED

AUG 3 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

The Honorable Andrew C. Barrett
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

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Barbara Roberts
Governor



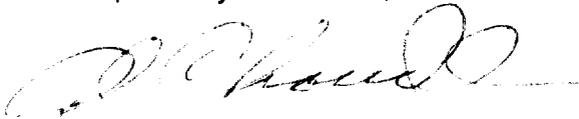
2575 Center Street NE
Salem, OR 97310
(503) 945-0950
FAX (503) 373-1173

The Honorable Andrew C. Barrett
July 27, 1994
Page Two

Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs and prison administrators do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs and prison administrators enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs and prison administrators are committed to requiring rates that are fair and reasonable.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Al Chandler', with a stylized flourish at the end.

Al Chandler
Assistant Director/Institutions
Oregon Department of Corrections

THOMAS F. HIGGINS
SHERIFF



ADMINISTRATIVE OFFICES
TEN DELAWARE AVENUE
BUFFALO NEW YORK 14202 3999
(716) 858-7618
FAX (716) 858-7680

POLICE SERVICES
ONE SHERIFF'S DRIVE
ORCHARD PARK NEW YORK 14127
(716) 662-6150
FAX (716) 662-8477

WILLIAM G. PAYNE
UNDERSHERIFF

SHERIFF OF ERIE COUNTY

July 25, 1993

POLICE EMERGENCY 911

CIVIL PROCESS
(716) 858-7606

HOLDING CENTER
(716) 858-7636
FAX (716) 858-7712

The Honorable Andrew C. Barrett
Federal Communications Commission
1919 M. Street, NW
Washington, D.C. 20554

RECEIVED
AUG - 3 1994
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Commissioner Barrett:

The Erie County Holding Center is opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have found it necessary to install sophisticated telephone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

It is imperative that we route inmates calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. Allowing inmates to have open access to the telecommunications network and the freedom to use any carrier they please would definitely interfere with the integrity of our security and our administrative rights to not only provide a service to the inmate population but also our obligation to the general public to prevent inmate abuse of same.

To permit Billed Party Preference at inmate facilities would remove our ability to maintain important security and administrative measures that we have implemented at our facility. Consequently, inmate phone availability would be reduced, important revenues for specific inmate programs and equipment would be lost, inmates' needs and those of their families would not be met, and in general, a very costic and volitile environment would be created for both inmates and staff members.

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July 25, 1994
Page 2

It is my responsibility as administrator to ensure the safety and security of both staff and inmates as well as the orderly operation of this facility. Therefore, I am strongly opposed to any federal interference with my ability to effectively manage and control inmate telephone services.

Respectfully submitted,

THOMAS F. HIGGINS
SHERIFF OF ERIE COUNTY

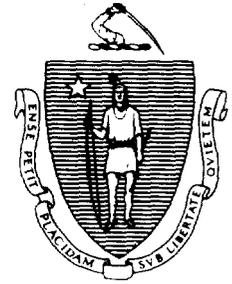

BY: JOHN J. DRAY
SUPERINTENDENT
ERIE COUNTY HOLDING CENTER
40 DELAWARE AVENUE
BUFFALO, NY 14202

cc: Sheriff Thomas F. Higgins
Undersheriff William G. Payne



Massachusetts Sheriffs' Association

200 Nashua Street
Boston, Massachusetts 02114



July 29, 1994

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PETER Y. FLYNN
Plymouth County

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Suffolk County

The Honorable Andrew C. Barrett, Commissioner
Federal Communications Commission
1919 "M" Street, NW
Washington, DC 20554

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AUG - 3 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: CC Docket No. 92-77, Billed Party Preference

Dear Commissioner Barrett:

The Massachusetts Sheriffs Association opposes the application of Billed Party Preference at inmate facilities.

With our unique security and administrative needs, it is essential to have a single carrier for handling inmate calls. BPP would take away that right and give inmates freedom to choose amongst carriers. That, in turn, would take away our right to coordinate all inmate calls through one carrier via contract, a system that gives us the security we need while safeguarding against fraud and abuse by inmate callers.

We would not be able to install fraud-proof systems without the help of inmate phone service providers. BPP would also eliminate the revenue stream used to pay for the system. (In Massachusetts, by law, any additional revenues generated by inmate phones must be used to benefit inmates. In my county, for example, we are installing a comprehensive, co-rom based law library and education system with these funds.)

Were BPP to be adopted, there would be no way to finance our inmate phone systems and no way to get the services that go along with it. That would devastate inmate morale and dramatically increase the tension our staff has to defuse every day.

617-635-1100 ext. 242; 617-635-4381 fax

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Letter to FCC

RE: Billed Party Preference

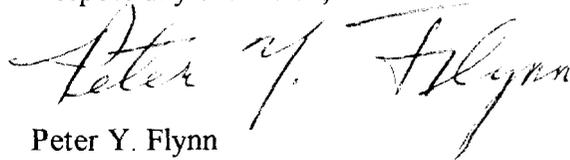
Page 2

Massachusetts sheriffs realize that inmate families should not be unfairly burdened by the cost of phone calls. But we don't believe BPP would solve the problem. A more effective solution would be to allow for a ceiling rate and let sheriffs enforce them contractually with their respective carriers. That, incidentally, is what we did in my county in our recent RFP.

Our fear, should BPP be adopted, is the likelihood of being forced to accommodate a number of different carriers -- companies with no contractual requirements that address our security needs *or* lacking the knowledge and capability to eliminate phone fraud. Or perhaps both.

The Massachusetts Sheriffs Association urges the FCC to steer clear of BPP. It would increase inmate tension and decrease staff efficiency. We believe the security and administrative issues at stake are decisions clearly within our discretion and best left to us, the elected officials of our respective counties.

Respectfully submitted,

A handwritten signature in black ink that reads "Peter Y. Flynn". The signature is written in a cursive style with a large, sweeping "P" and "F".

Peter Y. Flynn

President

Massachusetts Sheriffs Association

Carl R. Griffith, Jr.
Sheriff, Jefferson County, Texas

Deputy Chiefs
Kenneth A. Duhon - Law Enforcement & Employee Relations
Harry Lewis - Detention & Legal Advisor

P. O. Box 2950
Beaumont, Texas 77704
(409) 835-8411

July 29, 1994

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AUG - 3 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

The Honorable Andrew G. Barnett
Federal Communications Commission
1417 M Street, N.W.
Washington, D. C. 20551

Re: FCC Order No. 94-177, Application of Billed Party Preference

Dear Chairman Hundt:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed the necessity and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmate calls to be routed to the telecommunications network and the freedom to use any carrier they please. BPP will limit our inmate calls to inmate calls only through a carrier we have contracted. Inmate phone calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

We have also found it necessary to install new equipment that is specifically designed for inmate calls. This equipment helps to control inmate calls and other related activity over the telephone network. Given the constant budgetary constraints that we face, we cannot afford to purchase this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue to us that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, and we will lose our inmate phone service providers as a result. Without inmate phones, the morale of our staff will be greatly affected. The resulting increase in tension will make it very difficult to run a staff of many inmates.

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