

# Auburn University

Auburn University, Alabama 36849-5423

Division of Telecommunication and Educational Television

Telecommunications and  
Television Production Center

July 28, 1994

Telephone: (205) 844-4110  
ATTNet: 221-4110

Mr. W. Caton  
Acting Secretary  
Federal communications Commission  
1919M Street, NS  
Room 222  
Washington, D. C. 20554  
CC Docket No. 92-77

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Dear Mr. Caton:

Auburn University is opposed to the billed party preference for 0+ interlata long distance calling.

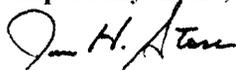
Auburn University, located in a rural State, is obligated to pay back a ten million dollar debt to cover the cost of a relatively new comprehensive, campus-wide telecommunication system. This debt is serviced from our projected future income. We anticipate that billed party preference may reduce our income over \$100,000.00 per year were it to be approved.

It seems that changes in technology, impending changes in the regulatory landscape, and continuing progress in unblocking of the nation's telecommunications infrastructure are already well on the way to accomplishing the job intended for billed party preference.

The implementation of billed party preference depends heavily on the network facilities of the monopoly based local exchange carriers. Given the front end responsibility for operation of billed party preference scheme, we believe the LECs will have yet another major reason to maintain their monopoly status and delay a full competitive atmosphere in the local loop.

The public's ability to choose, is meaningful only when there is a full competitive atmosphere. Our University system is one form of competitive pressure that already exists in the local loop. The national telecommunications policy should adopt a strategy that encourages Auburn University to continue to invest in its local telecommunication infrastructure, not discourage investment as we believe that the procedures described in CC Docket No. 92-77; Phase II will do.

Respectfully Yours,



James Stone  
Executive Director

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

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

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

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FEDERAL COMMUNICATIONS COMMISSION  
 OFFICE OF SECRETARY

July 28, 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

The Honorable Andrew C. Barrett:

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 adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contract. 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 decision...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  
3888 Leeds Avenue  
Charleston, South Carolina 29405



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**Richland County Detention Center**

1400 Huger Street

Columbia, South Carolina 29201

Telephone 748-4936

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

James A. McCaulley  
Director

July 28, 1994

The Honorable Reed E. Hundt  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

**RE: BPP (Billed Party Preference)**

Dear Mr. Hundt:

I am a Detention Center Director who has survived under the "old system" and who enjoys our current contract phone system, provided by our inmate phone service provider.

Inmate abuse of any system outside of the control of the institution is horrendous. When this abuse occurs, correctional staff time is wasted handling complaints from citizens, witnesses, prosecutors, law enforcement pertaining to abuse and threats by inmates.

Approval of the BPP for inmate telecommunications would be a **giant step backwards** in the area of inmate telecommunications.

We have built up trust and confidence with our inmate phone service providers over the years, and for all practical purposes eliminate fraud. Of greater impact, has been the elimination of harassment of victim/witness by inmates under our control. Additionally, there would be a great loss of revenue to local government's ever increasing cost. Should the phones be removed from our facility, and surely they would be, we would be set back at least a decade! Who would replace the phones, surely not the government entity.

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The Honorable Reed E. Hundt  
Page Two  
July 28, 1994

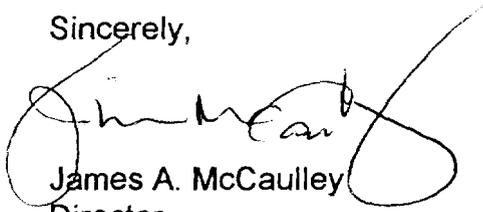
The greatest single improvement to the correctional field over the past eight years has been the phone system provided by an inmate phone service provider.

I have reviewed comments made on this issue from professional correctional practitioners from around the country. I echo all their concerns on the negative impact of BPP, should it apply to correctional facilities.

Your assistance is appreciated in "exempting correctional facilities from BPP".

Thank you in advance for your favorable consideration.

Sincerely,



James A. McCaulley  
Director

JAM/rjw (0726hund)



We've got the world  
at our wingtips

# WALKER FIELD Airport Authority

2828 Walker Field Drive, Suite 211  
Grand Junction, Colorado 81506  
(303) 244-9100  
FAX (303) 241-9103

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AIRPORT DIRECTOR  
Marcel J. Theberge, A.A.E.

July 29, 1994

Mr. William F. Canton  
Acting Secretary  
Federal Communications Commission  
1919 M. Street NW, Room 222  
Washington, DC 20554

RE: Docket No. 92-77

Dear Mr. Caton:

This letter is to express the concerns of the Walker Field Airport, Grand Junction, Colorado regarding Billed Party Preference (BPP) as per the following:

1. We are particularly concerned that the existing phone service will be degraded and there will be longer call set up times.
2. We are concerned about the extra expense that may be in the billions to implement the BPP and that this expense will be passed on to the consumer.
3. We are concerned about the lost of revenue to the airport at a time that airlines and airports are struggling financially.
4. We are concerned that the Billed Party Preference is not in the best interest of the public.

In summary, the Walker Field Airport Authority believes that Billed Party Preference is not needed and will result in major price increases to the consumer. We urge the Commission to reject the BPP.

Sincerely,

Marcel J. Theberge, A.A.E.  
Airport Director

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THOMAS F. HIGGINS  
SHERIFF

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POLICE SERVICES  
ONE SHERIFF'S DRIVE  
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POLICE EMERGENCY 911

CIVIL PROCESS  
(716) 858-7606

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

OFFICE OF  
WILLIAM G. PAYNE  
UNDERSHERIFF  
COMMISSIONER RACHELLE B. CHONG

SHERIFF OF ERIE COUNTY

July 25, 1993

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

The Honorable Rachelle 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 Commissioner Chong:

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.

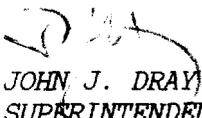
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CC Docket No. 92-77 Opposition to Billed Party Preference  
July 25, 1994  
Page 2

*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