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JUL 29 1994
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Swisher County



SHERIFF'S OFFICE
Larry P. Stewart, Sheriff
Phone 995-3326
TULIA, TEXAS 79088

[Handwritten signature]

DOCKET FILE COPY ORIGINAL

July 25, 1994

The Honorable Reed E. Hundt, Chairman
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 at inmate facilities.

We have analyzed the 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 do have a contract with. 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.

Furthermore, we are sympathetic to the rates inmate families pay

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Swisher County



SHERIFF'S OFFICE

Larry P. Stewart, Sheriff

Phone 995-3326

TULIA, TEXAS 79088

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 Sheriff's 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.

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,

Richard Cagle, Jail Administrator
Swisher County Sheriff's Office
136 E Broadway, Tulia, Texas 79088



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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

OKLAHOMA SHERIFFS' ASSOCIATION

P. O. Box 1094
Norman, Oklahoma 73070

July 1, 1994

The Honorable Reed E. Hundt
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

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

To Whom It May Concern:

In reference to Billed Party Preference, the Oklahoma Sheriffs' Association absolutely opposes BPP for the following reasons:

Jul 11 4 25 PM '94

- 1) We would have no control over who the inmates call. They could make threatening calls to judges, witnesses, jury members, or their victims and the victims families. If they can use any long distance carrier, we cannot put blocks on their calls to protect the public. We need to have control of our inmates calling, and strongly oppose any federal interference with our ability to do so.
- 2) We oppose federal efforts that infringe on our ability to provide our inmates with an effective phone system that still allows us to fund other important inmate programs. If not for current revenue sharing arrangements, we would have to cut some of our important inmate programs, such as family visitations, education, and drug rehabilitation programs.
- 3) We understand the needs of our inmates families concerning the rates charged by phone companies. We know that if we don't use a phone company with reasonable rates, the families will refuse these calls. This will reduce moral, and may cause the inmates to become frustrated and angry, and could lead to other problems. For these reasons it is important to us to keep rate ceilings down,

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OKLAHOMA SHERIFFS' ASSOCIATION

P. O. Box 1094
Norman, Oklahoma 73070

however, we feel that it should be up to us which company we use and not up to the inmates. The responsibility for ensuring that the provider charges reasonable rates lies with us, who are in the best position to evaluate the circumstances at our facility.

For these reasons we feel that it would be detrimental for this bill to be passed. We strongly urge you to consider all of the information, not just what some people want you to consider. We are opposed to this, and will try to make sure that all concerned will take all of this into consideration.

Sincerely,

A handwritten signature in black ink that reads "Don Hass". The signature is written in a cursive style.

Don Hass
President,
Oklahoma Sheriffs' Association

jm

STATE OF TENNESSEE
DEPARTMENT OF CORRECTION
FOURTH FLOOR, RACHEL JACKSON BUILDING • NASHVILLE, TENNESSEE 37243-0465

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CHRISTINE J. BRADLEY
COMMISSIONER

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

JUL 11 4 25 PM '94

July 6, 1994

The Honorable Reed E. Hundt
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear Chairman Hundt:

Subject: Billed Party Preference; CC Docket No. 92-77

This letter is being written to voice the Tennessee Department of Correction's (TDOC) opposition to Billed Party Preference (BPP) as it relates to the department's facilities. BPP would destroy the department's Inmate Telephone System (ITS) as it now stands.

The department, working closely with the state's Telecommunications Division, developed a comprehensive plan for improving inmate telephone service while at the same time instituting controls to prevent fraud and harassing calls. A Request for Proposal was issued and, eventually, AT&T was selected as the prime contractor.

Departmental staff, Telecommunications staff, and AT&T project team members strived to develop a system that would meet the department's needs, the inmates' needs and, most importantly, their families' needs. In order to do this, the group worked closely with Reverend Mary K. Friskics-Warren, Director of Reconciliation, a family prison support group.

The system, when completed, included the following:

- ▶ An average of twelve inmates, or less, per telephone.
- ▶ Inmates could make collect interLATA calls at AT&T's published tariff rates.
- ▶ Inmates could make collect intraLATA calls at South Central Bell's published tariff rates (SCB's surcharge was substantially less than AT&T's).
- ▶ Inmates could make debit interLATA and intraLATA calls at a 15 percent discount from published tariffs.

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The Honorable Reed E. Hundt

Page 2

July 6, 1994

The above was done at a cost of \$7,000,000 to be amortized over five years. Therefore, while not a profit generator, the revenue received over this five-year period was planned to cover a high proportion of these costs.

The inmates and their families, as reported by Reverend Friskics-Warren (see attached 8/30/93 letter), are pleased with ITS. At the same time, fraud and harassing calls have been seriously curtailed.

I can only conclude by stating that Billed Party Preference would cause serious operational problems for the Tennessee Department of Correction.

Sincerely,

A handwritten signature in cursive script, appearing to read "Christine J. Bradley".

Christine J. Bradley
Commissioner

CJB:GWJ:AM

Attachment

pc: The Honorable James H. Quello
The Honorable Andrew C. Barrett
The Honorable Rachelle B. Chong
The Honorable Susan Ness
The Rev. Mary K. Friskics-Warren



P.O. Box 90827
Nashville, Tennessee
37209-0827
Office: 615-292-6371
Fax: 615-292-6383
Guest House: 615-386-3723

Director
Rev. Mary K. Friskics-Warren

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Reconciliation Guest House
Separate Prisons Support Groups
Separate Prisons Children's Programs
Family Advisory Boards
Youth Wilderness Camping Trip
Kid's Komer
Couples of Prison Experience (COPE)
Advocacy for Families
Counseling with Families
Handbook for TN. Prison Families
Community and Congregational Ed.

A MEMBER OF
**COMMUNITY
SHARES**
A Fund for Change

August 30, 1993

George Jungmichael
Tennessee Department of Correction
320 6th Ave North
Nashville, TN 37243-0465

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AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Mr. Jungmichael,

On behalf of the families of inmates in Tennessee, I want to thank you for your cooperation during the transition to a new inmate phone service.

When the Tennessee Department of Correction announced its plans for a new inmate phone system in 1992, inmates and families were alarmed. Phone communication is essential to maintaining family bonds through the crisis of incarceration. It is especially important for out-of-town families since visitation is less frequent and phone are often the only means of communication. Many families feared the worst. As the final Tennessee institution joins the system, I must say that we are please with the current status of the project.

The smooth transition is due in large part to the following:

- Your open communication with families including meeting with the Separate Prisons Support Group, printing information cards, publishing articles in the prison papers and receiving phone calls from concerned family members.
- Your willingness to speak truthfully when the phone system was having problems and your enlistment of families to identify and correct the problems (including refunding money to families who were overcharged).
- The options of collect or debit calls (which allows for a discounted rate in the case of debit calls).
- Your advance notification that all non-attorney calls are recorded and kept for 90 days, as well as the decision to disconnect third party and call forwarding
- Your concern for family communication while speaking clearly to the department's concern for phone fraud.

I wish all state and county jails worked as hard as you have to enable positive family communication. I commend you and the Tennessee Department of Correction for the smooth transition to the new phone system. We look forward to working with you in the future as together we seek to improve systmes for inmates, families and the Department of Correction.

God's Peace,

The Rev. Mary K. Friskics-Warren

cc Commissioner Christine Bradley

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OFFICE OF THE SHERIFF

EL PASO COUNTY

BERNARD J. BARRY
SHERIFF

July 5, 1994

EDWARD G. WOLF
UNDER SHERIFF

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AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

11
4 25 PM '94

The Honorable Reed E. Hundt
Federal Communication Commission
1919 M Street, N.W.
Washington, D.C. 20554

RE: BILLED PARTY PREFERENCE; CC DOCKET NO. 92-77

Dear Chairman,

As an administrator for an Adult Local Detention Facility, I oppose "Billed Party Preference" for inmates in my custody.

Through the years we have frequently received complaints from the public regarding telephone activities by inmates. These include threats, fraudulent activities, pleas for moneys, repeated harassment calls, etc. We responded to these complaints with strict security measures provided by our phone vendor. Billed Party Preference will incapacitate our ability to employ our security features. I am obligated to the public to minimize inappropriate use of telephones by inmates.

Under Colorado Statutory requirements revenues generated through inmates are placed in an "Inmate Welfare Fund." These funds directly benefit inmates through the purchase of educational equipment, educational programs and recreational items. They are also used to fund drug and alcohol abuse classes, etc. Without the support of the telephone revenues, these programs and activities would have to be curtailed. The loss of this revenue would greatly hamper any reform programs within the jails.

Currently vendors bid for inmate phone service contracts, thus keeping the rates for phone calls competitive. The vendor has an invested interest in controlling fraudulent activities. Prior to this system, the carriers wrote off these fraudulent activities, unfortunately, by passing the lost revenues to the general public.

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I oppose this complex federal effort that would impair my ability to control inappropriate behavior of inmates and protect the welfare of the general public.

Respectfully,



Captain Kenneth L. Hunt
Commander Metro Detention Facility

CC: The Honorable James H. Quello
The Honorable Andrew C. Barrett
The Honorable Rachelle B. Chong
The Honorable Susan Ness

KB

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WELLINGTON E. WEBB
Mayor

CITY AND COUNTY OF DENVER

DEPARTMENT OF SAFETY

DENVER SHERIFF DEPARTMENT
P.O. BOX 1108
DENVER, COLORADO 80201

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July 6, 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

JUL 11 4 25 PM '94

The Honorable Reed E. Hundt
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

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

Dear Chairman:

As the chief administrator for an Adult Local Detention facility, I oppose "Billed Party Preference" for inmates in my custody.

Through the years we have frequently received complaints from the public regarding telephone activities by inmates. These include threats, fraudulent activities, pleas for monies, repeated annoyance calls, etc. We responded to these complaints with strict security measures provided by our phone vendor. BPP will incapacitate our ability to employ our security features. I am obligated to the public to minimize inappropriate use of telephones by inmates.

Currently vendors bid for inmate phone service contracts thus keeping the rates for phone calls competitive. The vendor has an invested interest in controlling fraudulent activities. Prior to this system the carriers wrote off these fraudulent activities; unfortunately by passing the lost revenues to the general public.

I oppose this complex federal effort that would impair my ability to control inappropriate behavior of inmates and protect the welfare of the general public.

Respectfully,

Division Chief F. J. Oliva
Denver Sheriff Department
Denver County Jail Division

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List: ABCDE

The Honorable Reed E. Hunt
July 6, 1994
Page 2

P.O. Box 1108
Denver, CO 80201
303-375-5656
303-375-5500 FAX

cc: Mr. John Simonet, Director of Corrections
Mr. Fidel "Butch" Montoya, Manager of Safety
Scott Casebolt, Communications
Pat Robustelii, PTC
File

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STANLEY GLANZ
SHERIFF

JIM C. HELM
CHIEF DEPUTY
SERVICES DIVISION

WILLIAM R. THOMPSON
UNDERSHERIFF

TULSA COUNTY SHERIFF
500 S. DENVER
TULSA, OKLAHOMA 74103-3832
(918) 596-5601

ROBERT L. MACKECHNEY
CHIEF DEPUTY
OPERATIONS DIVISION

July 5, 1994

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

The Honorable Reed E. Hundt
Federal Communications System
1919 "M" Street Northwest
Washington, D.C. 20554

AUG 11 4 25 PM '94

Reference: Bill Party Preference; CC Docket #92-77

Dear Sir:

As the Sheriff of Tulsa County I have the responsibility to manage a 900 bed jail in Tulsa County which includes providing an inmate phone service.

I am requesting that the inmate phone service be excluded from the proposed Bill Party Preference (BPP). The matter in which these calls are made, routed and controlled has to be absolute. The only way that I have found to prevent fraud, call abuse of victims, harassment of witnesses, family members and judges, is to have the ability to block calls. The present system allows for such control, a called party preference system would not.

It is imperative that I have the ability to control the inmate population and also provide them with access to the public. Our phone system allows inmates to call the media, their family and anyone else they wish to call. However, if we get complaints or requests from individuals to have their phone number blocked, then we have the ability to have that security.

I have been advised that there are no inmate phone systems that would be capable to provide the necessary controls that we have on the market today that we could afford to buy to provide that service.

In addition to providing the inmates with a system to call their family and friends the system provides the necessary revenue to pay for the equipment that this service requires. With the current financial burden on Tulsa County I do not believe we could purchase a system to continue the inmate telephone service. Thus, it would reduce inmate access to

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their families, lawyers and friends. It would also be a bigger burden on the management of the inmate population as they now have total access to the phone.

We are very sensitive to the rates that inmate families and friends pay for calls. We only contract with providers that agree to charge these tariff rates as provided by the FCC. We also monitor the charges monthly to ensure that the provider is in compliance. I am opposed to any efforts that infringed on our ability to manage inmate and provide an effective phone system for the citizens of our county. At the time we are all experiencing revenue shortage to try to meet the demands of the public. The FCC should not be reducing funds available to counties to provide services to the inmates.

We are opposed to Bill Party Preference and request that county jail and correctional facilities be excluded from these rules.

Respectfully,

A handwritten signature in black ink, appearing to read "Stanley Glanz", written in a cursive style.

Stanley Glanz
Sheriff

/sc

cc: Honorable James H. Quello
Honorable Andrew C. Barrett
Honorable Rachelle B. Chong
Honorable Susan Ness



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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Kenosha County Sheriff's Department

Allan K. Kehl, Sheriff

July 8, 1994

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

Re: Billed Party Preference, ("BPP")
CC: Docket # 92-77

JUL 11 4 25 PM '94

Sir:

It is my understanding that a decision is forthcoming reference the FCC proposal to extend Billed Party Preference, ("BPP") to inmate calls. I would like to take this opportunity to convey to you my thoughts and concerns on this matter as it pertains to the potential impact such a proposal would have on this facility. Let me begin with a little background information on our operation. The Kenosha County Jail is located in the southeastern corner of Wisconsin. It operates as one of the largest county detention facilities in the state, with an average daily population of 350 inmates. We currently contract with Global Tel-Link of Mobile, Alabama for inmate telephone services.

It is my feeling that extending BPP to inmate calls would create serious negative implications for both this facility as well as for the inmates themselves. If enacted as it is presently proposed, BPP would effectively reduce or eliminate the management and control of the telephone services within the Kenosha County Jail. Such a situation would create a serious dilemma for this or any other similar facility. I would cite the following examples as a basis for my concerns:

(1). The inability to manage telephone activity within the controlled environment of the jail resulting in instances of abuse and fraud, both of which are historically cited as significant problems that create security risks.

(2). The potential of inmates using the telephone for purposes of harassment to individuals involved in their cases. This may include victims, witnesses or even judges.

(3). The reduction and/or elimination of inmate phones could ultimately result. Without the authority to process the calls and receive the revenue, many providers will

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not be able to purchase or maintain today's sophisticated telephone equipment. Without the financial assistance, many jails and prisons may likely revert back to past, restrictive methods of allowing inmate calling.

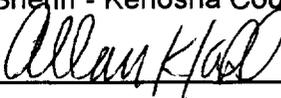
(4). The inability of ensuring that the inmate telephone service company provide sensible and reasonable rate guarantees and rate monitoring services, thus eliminating the ability to acquire competitively by bid, the most cost effective service for inmates. This is a protective measure and benefit that they will be unable to achieve for themselves. I feel that the long distance rates could actually increase over Bell Company and AT&T rates. The reason for this can be attributed to the standing policy of the FCC which requires that the cost of any new service be paid for by the actual users of the service rather than the general public. The estimated cost of implementing BPP is expected to be 1.5 billion dollars. This figure could further escalate if the costs of adding special fraud and security features are factored in. These costs would in all likelihood be borne exclusively by inmate families and others who receive inmate calls. Our current system already provides for these security measures.

(5). Such a proposal could totally eliminate any revenue sharing ability between Kenosha County and the telephone service provider. This loss of approximately \$100,000.00 to Kenosha County annually, will impact the availability of any of these funds to provide for future programming to aid inmates in the county jail.

On behalf of the Kenosha County Jail and the Kenosha County Board of Supervisors, I would like to go on record in vigorous opposition to any federal measures which would interfere with the ability of Kenosha County to manage and control telephone services to the inmates of this facility. I feel that we currently have the ability to provide the most manageable and effective telephone service available, while generating revenue for programming. Any attempt to infringe upon this system is strongly opposed.

Respectfully:

Allan K. Kehl
Sheriff - Kenosha County

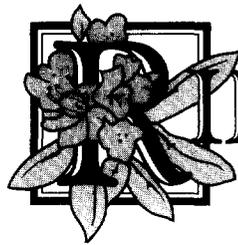


Lt. Mark E. Schlecht

By: Lt. Mark E. Schlecht
Lieutenant / Detentions

MES:mes

cc: Sheriff
Chief Deputy
Captain McRoberts
APCC Inmate Phone Providers Task Force
File



RIDGECREST RECEIVED *KB*
CONFERENCE CENTER **AUG 12 1994**

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

P. O. Box 128, Exit 66, I-40 and Old U. S. 70 East, Ridgecrest, NC 28770
(704) 669-8022 phone (704) 669-9721 fax

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JUL 11 4 25 PM '94

July 7, 1994

The Honorable Reed F. Hundt
Federal Communications Commission
1919 M St. N.W.
Washington, D.C. 20554

RE: BILLED PARTY PREFERENCE
CC Docket No. 92-77

Dear Sir:

Ridgecrest Conference Center is a year-round, Baptist sponsored center in the western North Carolina mountains. We have 750 rooms with NO PHONES IN ANY ROOMS, therefore; our over 60,000 yearly guests from across the U. S. A. must have access to pay telephones.

We asked a private payphone vendor to supply us with payphones after the local phone company removed over half of our phones reducing the payphone service to our guests by over 60%. This removal of payphones was totally unacceptable to us.

Since over 80% of our calls are 0 + (charge card, reverse charges, etc.) our payphone vendor advises us that if "Billed Party Preference" is implemented that they would also have to remove their payphones due to the tremendous loss in revenue.

Activity reports on our phones have shown me that the current system of access codes (10288-10ATT) is working fine and our guests have easy access to the carrier of their choice.

I am sure that our operation is only one of many thousands who feel as we do, and hope that the dialing system will not be made any more confusing and costly, such as "Billed Party Preference" would do.

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Your sincere consideration of our problem will be greatly appreciated.

Sincerely,

A handwritten signature in cursive script that reads "Bill Capell". The signature is written in black ink and is positioned above the printed name.

Bill Capell
Manager, Marketing and Conference Services

cc: The Honorable James H. Quello
The Honorable Andrew C. Barrett
The Honorable Rachelle B. Chong
The Honorable Susan Ness

BC:rv

PRESIDENT
Jack Barney
Lewistown, MT 59457
538-3415

PAST PRESIDENT
Barry Michelotti
Great Falls, MT 59401
761-6842

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AUG 12 1994

SECRETARY-TREASURER
Tony Harbaugh, Sheriff
1010 Main Street
Miles City, MT 59301
Office: 232-2237

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY
OFFICIAL PUBLICATION
"THE MONTANA SHERIFF"

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323-1402

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Virginia City, MT 59755
843-5351

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Missoula, MT 59801

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Great Falls, MT 59401

Robert Henschel 256-2928
Billings, MT 59107

July 6, 1994

The Honorable Reed Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

92-77

JUL 11 11 04 AM '94

Dear Mr. Hundt:

On behalf of the Montana Sheriff's and Peace Officers Association, I am writing to express our concern and objections to the implementation of a system of Billed Party Preference for calls from inmate phone systems.

The argument which states that such a system will be a benefit to the inmates is simply not true. Inmates would see an immediate decline in their ability to communicate with family and others. Such a system would result in inmates not being able to make any phone calls. Small jails in particular would be unable to allow the unlimited access to phones that inmates now enjoy.

Under the proposed system of Billed Party Preference the jails in the state of Montana would be unable to manage an inmate phone system individually. Jails in Montana do not have the staff available to monitor calls, record what calls were made and to whom the call was made. Such a system would be a step backward in jail management.

Fraud and abuse would be simple and lucrative for inmates.

The level of security in the facilities would be lowered and the tension levels would increase. Under the present system the Billed Party has the choice of accepting or rejecting the call. Numbers can be locked out and records of calls can be accessed.

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The Billed Party Preference System would do nothing to increase the level of security or safety of either the staff or inmates in any detention facility. In actuality it would decrease the level of security.

We hope you will consider exempting detention facilities, jails, prisons and other similar types of facility's from Billed Party Preference.

Sincerely,

A handwritten signature in black ink, reading "Lt. James R. Cashell". The signature is written in a cursive style with a large, stylized initial "L".

Sheriff Tim Solomon, President
by: Lt. James R. Cashell, Chairman, Jail Issues Committee

cc: Senator Max Baucus
Senator Conrad Burns
Representative Pat Williams

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AUG 12 1994

CENTRE COUNTY PRISON

213 East High Street
Bellefonte, PA 16823
(814) 355-6794

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

G. E. WILSON
Warden

DEBRA K. FETZER
Deputy Warden

11 04 AM '94

July 1, 1994

The Honorable Rood Hundt
Federal Communications Commissions
1919 M. Street, N.W.
Washington, D.C. 20554

RE: Billed Party Preferences
CC Docket No. 92-77

Dear Sir,

I am writing to express my strong opposition to the BPP for inmate phones. Implementation of such a policy will prove disastrous to prison's and corrections and facilities which are obligated by policy, practice and law to protect society from the depredations, harm and scams of our committed criminally convicted populations.

The present inmate collect call systems are designed to provide security, evidence trails and protection from criminal harassing phone calls from inmates to victims, courts, business, etc...while providing needed and desirable contact, communications and social links with friends and family.

The BPP policy would mean that prisons and correctional facilities would lose monitoring and physical control of any and all phone calls including evidence trails of offenders who chose to continue their criminal activities.

Some very predictable outcomes of the BPP Policy would be as follows.

1. Harassing, threatening and terrorizing phone calls to victims, judges, police, parole departments and public defenders and of course, victims.

2. Massive credit card frauds such as already has taken place in some facilities which have victimized the public and in numerous cases, the prison staff.

No. of Copies rec'd 0
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3. Ability of inmates to plan, manage and order, without control or fear of apprehension, new crimes and depredations.

The prisons and correctional facilities would have to take measures to eliminate the infinite amount of security risk at the expense of the inmates by eliminating or severely reducing numbers of phone calls made by inmates to the outside thus severely affecting their desperately needed social links.

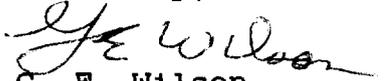
The Inmate Commissary funds would lose significant income that would adversely affect the availability of such inmate benefits and privileges as cable TV, movies, recreational equipment, computer and educational supplies, supplies for Drug and Alcohol and psycho therapy programs.

The elimination of phone commissions source would increase public tax expenditures and would result in elimination of badly needed treatment programs.

The assertion of unreasonable costs for inmate collect calls are a realistic concern. However it appears to me that the competitive aspect of competing companies are and will control costs as will public resistance to extraordinary cost for collect calls.

It is my belief that the BPP Policy would have the effect of increasing costs to inmate families and limit numbers of contacts able to handled by facilities and increase the use of public funds (taxes). Decrease equipment and supplies available for the use of inmates for recreation and off time. Significantly increase the potential for fraudulent activities by inmates.

Sincerely,



G. E. Wilson
Warden

cc: Representative Clinger
Senator Spector
Senator Wofford

KB



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SEDGWICK COUNTY, KANSAS

SHERIFF'S DEPARTMENT

MIKE HILL
Sheriff

COUNTY COURTHOUSE • 525 N. MAIN • WICHITA, KANSAS 67203 • TELEPHONE 383-7264 • FAX 383-7758

July 6, 1994

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AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

JUL 11 11 04 AM '94

The Honorable Reed E. Hundt
Federal Communications Commission
1919 M. Street, N.W.
Washington, D. C. 20554

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

Dear Chairman:

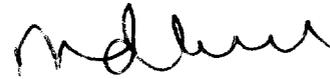
As Sheriff of Sedgwick County, Kansas, I am responsible for the operation of a 420 bed detention facility with an additional 451 bed addition in the planning stages. Further, I am also responsible for the operation of a work release facility. Billed Party Preference would profoundly undermine the security and penological interests of jail operations. I have had to direct Southwestern Bell, our primary service provider, to install additional equipment in order to reduce the incidents of 3-way calling used to contact witnesses and victims of crimes.

Telephone call abuse inside correctional facilities is a serious issue, especially in a pre-trial facility where attempts to coerce witnesses and victims into not testifying are a common occurrence. If Billed Party Preference were to include jails and correctional facilities, additional staff would have to be requested in order to provide security and supervision of inmate placed telephone calls. An inmate making a long distance call through a carrier who has chosen not to cooperate with our local provider could have that call re-routed back, without detection, to a victim and/or witness.

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List ABCDE

I recommend that the requested exemption for jails and prisons be included as part of Billed Party Preference. If not, there are citizens throughout the country who would suffer every day by receiving threatening and unwanted calls.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael D. Hill".

**MICHAEL D. HILL
SHERIFF**

MDH/gmk

cc: **The Honorable James H. Quello
The Honorable Andrew C. Barrett
The Honorable Rachelle B. Chong
The Honorable Susan Ness**

KB



HOUSE OF CORRECTION

Milwaukee County

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AUG 12 1994

RICHARD C. COX • Superintendent
LEVERETT F. BALDWIN • Deputy Superintendent

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

July 7, 1994

DOCKET FILE COPY ORIGINAL

The Honorable Reed E. Hundt
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

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

I am writing in opposition to the inclusion of prison phone service in the proposed Billed Party Preference plan.

I am the Superintendent of a correctional facility that houses an average of 1400 inmates per day. Included in this population are over 1000 inmates without community access who rely on our inmate collect call phone system in order to maintain contact with their family and friends.

The inmate phone system is a useful tool in the management of an inmate population. Properly managed, the availability of telephone privileges is a means of providing both higher inmate morale and better discipline. Therefore, correctional facility administrators are interested in providing an inmate phone system that charges reasonable rates and provides good service with a sufficient number of phones. If rates are too high or service is poor or the number of phones is inadequate, the inmate population will become frustrated, angry, and more difficult to manage.

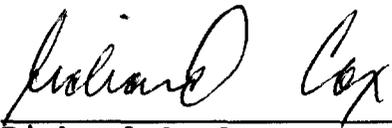
Competition among inmate phone system providers has enabled us to install an inmate phone system consisting of 100 phones that satisfies our security concerns and satisfies the inmates needs for access to telephone privileges without cost to taxpayers that bear the burden of funding the majority of detention services. In addition, commissions generated by the inmate phone system partially offset the cost of incarceration and permit increased inmate educational and treatment programs.

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The Honorable Reed E. Hundt
RE: Billed Party Preference
July 7, 1994
Page 2

If implementation of the Billed Party Preference plan results in the elimination of the current revenue-sharing arrangements with inmate phone system providers, the number of phones available for inmate use would be reduced and it is unlikely that inmate programs would continue at existing levels. Therefore, I request that you exempt correctional facilities from the Billed Party Preference plan.



Richard C. Cox
Superintendent

JP:vc

cc: The Honorable James H. Quello
The Honorable Andrew C. Barrett
The Honorable Rachelle B. Chong
The Honorable Susan Ness
Inmate Phone Service Providers Task Force