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AUG 15 1994
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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)
	)
Billed Party Preference	)
For 0+ InterLATA Calls	)

Doc. 92-77

COMMENTS OF THE SUMMIT COUNTY SHERIFF'S OFFICE, AKRON, OHIO

As Sheriff of Summit County and the official responsible for the operation of the Summit County Jail in Akron, Ohio, I am strongly opposed to proposed Billed Party Preference for collect telephone calls. There are several areas that will be affected to the detriment of our facility, namely:

1. Victim and Witness harassment via inmate phones. Currently, our phone service provider is contractually committed to provide call and fraud controls to our facility. With BPP, control is lost and inmates could harass those involved in the criminal prosecution process.

2. Loss of on site phone system supervision by facility personnel. Currently, an officer is not required each time an inmate makes a telephone call. This helps to keep our costs down and reduces security risks that might be incurred by staff. It also results in better discipline and higher inmate morale by increasing the availability of telephone services to inmates.

3. Loss of phone number blocking capability. As stated above, this can result in harassment of those in the criminal prosecution process and in undesired contact of facility staff by inmates.

4. Loss of call durationing capability. The inability to automatically limit the length of prisoner telephone calls will result in inequity of availability for all inmates to access phones. Predatory inmates may attempt to control access to phones, making opportunities for disputes and altercations over phone access increase dramatically.

5. Loss of collect only capability. This will result in the need for increased staffing, less phone availability to inmates and a potential increase in telephone fraud by inmates.

6. Loss of inmate phone system commissions. Our current system helps fund inmate programs and defrays the cost of jail operations. We at the Summit County Jail remain sensitive to the rates that inmates' families pay for calls. We continue to work with our phone service provider to charge reasonable and sensible calling rates.

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7. Increased budgetary costs to provide alternative mechanisms for inmate calls. This lack of funding may result in the reduction of the availability of inmate phones.

Along with these major concerns, I also see a problem with who is going to fund the change to Billed Party Preference. BPP is an expensive technology which will work to the detriment of our facility. Therefore, I am strongly opposed to BPP and I encourage the FCC to do the same.

Thank You,

Sheriff David W. Troutman
County of Summit
53 University Avenue
Akron, Ohio 44308

LARRY A. FIELDS
DIRECTOR

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DAVID WALTERS
GOVERNOR

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STATE OF OKLAHOMA
OKLAHOMA DEPARTMENT OF CORRECTIONS
WESTERN REGION

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

August 4, 1994

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

Subject: BILLED PARTY PREFERENCE (CC DOCKET #92-77)

Dear Chairman Hundt,

I am writing in regards to the proposed change in telephone service for correctional facilities, specifically the Billed Party Preference. I will attempt to relay my concerns with the changes as it affects the correctional system in Oklahoma.

Currently our inmate phone systems allows the facility administrator to establish certain parameters for inmate calls with the contracted long distance service provider. They can restrict certain numbers, area codes, record the number called with time, date and duration of the call. We need to be able to implement changes immediately with a vendor we are familiar with and who is familiar with the needs of a correctional environment. These needs are vastly different than the public's need for long distance service. These services are generally agreed upon before a contract is established so all parties are aware of the process and criticalness of the need to make immediate changes. This information can become vital if the need arises where possible additional criminal charges may be warranted. If we lose these types of controls and records, we may not be able to provide the needed information to the district attorney in a timely manner.

We currently receive commissions from the long distance service provider that are used to provide needed programmatic services, welfare and recreation equipment and supplies, etc., to the inmate population. If this commission is reduced or eliminated, the impact on inmate programs would be devastating. If we were to fund these items from our general operating budget, the facilities would have to reduce other expenditures to offset this loss in revenues.

I believe there is a misconception that the long distance service provider is overcharging the inmates families due to the commissions we receive. This is far from the truth, we make

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305 NORTH WASHINGTON • P.O. BOX 858 • WEATHERFORD, OKLAHOMA 73096
(405) 772-0247 • FAX (405) 772-8431

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every effort to ensure the rates charged are fair and reasonable. The service provider must be able to make a reasonable profit and we use the revenues to provide services and programs to benefit the inmate population. If we selected a carrier that charged un-reasonable rates, all parties involved would suffer when the inmates families would not accept the calls, thereby reducing the revenues.

With our current systems, we can, and do when warranted, restrict calls to victims of the inmates; this protection may not be possible with the billed party preference system. We have the need and the desire to protect the victims from further anguish from the perpetrator of the crime.

I feel we, as correctional administrators are in a better position to manage and control inmate calls. We are familiar with methods inmates use to attempt to abuse the phone privileges and telephone systems and have processes in place to handle these situations when they arise.

I urge you to exempt prison and jail systems from the Preferred Party Billing method.

Thank you for the opportunity to provide information from a corrections practitioner viewpoint.

Sincerely,

Gary A. Parsons, Regional Director

GAP/dsh/may

cc: Larry A. Fields, Director
File

August 8, 1994

LIVINGSTON COUNTY
SHERIFF'S DEPARTMENT
150 Highlander Way • Howell, Michigan 48843
(517) 546-24

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DONALD D. HOMAN
Sheriff

KENNETH L. WRIGHT
Undersheriff

LT. HENRY I. GALLUP
Law Enforcement Operations

LT. IVAN G. DEERING
Detective Bureau

LT. KENNETH R. GRIFFIS
Jail Administrator

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August 8, 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

Dear Chairman Hundt:

I am writing to you in regard to our Department's opposition to the application of Billed Party Preference (BPP) to inmate facilities.

Due to security and administrative needs, we feel it is necessary to route all inmate calls from our facility to a single carrier 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 that away from us. If the calls are routed to a number of different carriers, most of them would have no obligation to us.

At the present time, we have installed phone equipment that is specifically designated for inmate calls. This equipment helps prevent fraud, abusive calls and other criminal activity over the telephone network. Due to budgetary constraints, we cannot afford to provide this equipment without the help of inmate phone service providers. If BPP is applied, we will lose any assistance provided by inmate phone service, as well as, any means of financing the system.

Inmate phone systems seem to make it easier for correction officers to manage inmates, due to the higher morale of the inmates. We are not only sensitive to the inmates, but to their families as well. We do not want to see inmate call rates get out of hand. We are concerned this would happen with BPP. An effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through the contract with carriers. We believe that most Sheriffs are committed to being fair and reasonable.

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In closing, it is our belief that BPP would be a giant step backwards in providing security and sound administrative procedures, which we try to improve on a daily basis. Please do not adopt a regulation that would interfere with our responsibilities to the general public.

Respectfully Submitted,

Donald D. Homan

Donald D. Homan,
Sheriff Livingston County

DDH/ajs

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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Milwaukee County Sheriff's Department
821 West State Street
Milwaukee, Wisconsin 53233
Phone (414) 278-4766

Richard E. Artison
Sheriff

August 9, 1994

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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 strongly oppose the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed security and administrative needs at our facility and have found it necessary to route inmate calls from our facility through a single carrier 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 telephone calls.

We have also found it necessary to install phone equipment specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given constant budgetary constraints, we cannot afford to provide this equipment without the help of our inmate phone service provider. BPP would eliminate the revenue stream that finances our inmate phones and would put the financial burden of maintaining the inmate phone system on the County taxpayers. Should this occur, our phone service would be substantially cut back. Without inmate phones, the morale of our inmates will decrease and the resulting tension will make managing the inmates more difficult for our staff.

Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern for protecting inmate families from abusive rates. We do not agree with the FCC that the solution is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and 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.

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Milwaukee County Sheriff's Department
821 West State Street
Milwaukee, Wisconsin 53233
Phone (414) 278-4766

Richard E. Artison
Sheriff

In short, BPP will:

- **severely curtail our ability to maintain facility security.**
- **restrict our ability to provide and control inmate telephones.**
- **reduce our ability to protect the public from unwanted inmate telephone calls and increased criminal activity.**

We urge you, DO NOT ADOPT regulations which will interfere with our primary public responsibilities- jail security and crime prevention.

Respectfully submitted,

Wm W Trapp

William W. Trapp, Acting Facility Administrator
Milwaukee County Jail & Criminal Justice Facility
949 N. 9th Street, Milwaukee, WI 53233

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

SHERIFF JOHN A. GRABOWSKI

P.O. BOX 70, 870 S. MAIN, CHEBOYGAN, MICHIGAN 49721 PH. 616-627-3155
FAX: 616-627-8880

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

August 11, 1994

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

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

Dear Chairman Hundt:

This correctional facility is 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 prisoners 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 prison calls through a carrier we know and trust. Instead, prison 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 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 phone, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our prisoners 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 families pay for inmate calls. We fully appreciate the FCC's concern if Sheriff's do not take responsibility for protecting inmate families from abusive rates. We are very concerned that the FCC's 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.

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. Please do 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 John A. Grabowski
Cheboygan County
870 S. Main St.
Cheboygan, MI 49721

JAG:pr

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VAN BUREN COUNTY SHERIFF'S DEPARTMENT

205 S. KALAMAZOO STREET • PAW PAW MICHIGAN 49079-1594

H. CAL ROSEMA
Sheriff

DALE R. GRIBLER
Undersheriff

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

August 10, 1994

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:

The Van Buren County Sheriff Department is 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 prisoners to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our rights to coordinate prison calls through a carrier we know and trust. Instead, prison 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 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 prisoners will be devastated. The resulting increase in tension will make it more difficult to our staff to manage inmates.

Furthermore we are sensitive to the rates families pay for inmate calls. We fully appreciate the FCC's concern if Sheriffs do not take responsibility for protecting inmate families from abusive rates. We are very concerned that the FCC's 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 Sheriff's are committed to requiring rates that are fair and reasonable.

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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. Please do 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.

Sincerely,

Dale R. Gribler

Dale R. Gribler, Undersheriff
Van Buren County

DRG/rms

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Harold Barr, Sheriff

GRAND TRAVERSE COUNTY
SHERIFF DEPARTMENT
320 WASHINGTON STREET • TRAVERSE CITY, MI 49684-2583
EMERGENCY CALL 911
SHERIFF'S ADMINISTRATION (616) 922-4504
GENERAL BUSINESS (616) 922-4500
FAX (616) 922-4515

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

August 5, 1994

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 have continually analyzed and administered the needs of our facility and found it 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. For security reasons 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 that we know and trust. Instead, jail calls will be routed to a number of different carriers, none of whom will have an obligation to us.

Several years ago we found it necessary to install phone equipment that was specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, harassing telephone calls, and any other criminal activity over our telephone system. It should also be noted that for the security of jails and prisons it is necessary for us to have calls directed over one carrier that we trust. Budgetary constraints that Counties are now under does not provide us funding to afford to purchase this equipment without the help of inmate phone service providers. BPP will eliminate the revenue stream that finances our inmate telephones. 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. We lack the expertise to manage this service ourselves. 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. Having the inmate telephone service allows the inmate to make contact with his family, counselors, the clergy, and people from the legal profession. Without it these contacts would be eliminated.

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Furthermore we are sensitive to the rates families pay for inmate calls. We fully appreciate the FCC's concern if Sheriffs do not take responsibility for protecting inmate families from abusive rates. We are very concerned that the FCC's 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. We believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable. Presently Sheriffs set fair and reasonable housing rates which directly falls in line with the fair and reasonable rates for telephone systems.

In short, BPP will 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 ask you not to 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.

Sincerely,

Thomas Schmuckal, Captain
Jail Administrator
Grand Traverse County Correctional Facility
320 Washington Street
Traverse City, MI 49684

TCS:hjc

cc: The Honorable James H. Quello
The Honorable Andrew C. Barret
The Honorable Rachelle B. Chong
The Honorable Susan Ness
Senator George A. McManus, Jr.
Representative Michelle McManus

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Isabella County Sheriff's Department

Sheriff Barry L. DeLau
207 Court Street • Mt. Pleasant, MI 48858 • (517) 772-5911

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

August 8, 1994

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

Re: CC Docket #92-77 Opposition to Billed Party Preference

Dear Chairman Hundt:

Isabella County is opposed to the application of Billed Party Preference at inmate facilities.

Isabella County has recently reviewed and analyzed the security and administration needs at our facility and have found it 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 prisoners to have open access to the telecommunications network and the freedom to use any carrier they please. Billed Party Preference will take away our right to coordinate prison calls through a carrier we know and trust. In addition, the security and administrative decisions would be at the carriers discretion rather than the Sheriff departments. Instead, prison 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.

Isabella County has also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment prevents fraud, abusive calls, and other criminal activity. Without the ability to contract with a single carrier, the burden of providing this equipment would fall back on the county. Isabella County is not prepared to finance this added burden. In addition, inmates are mentally and emotionally dependant on the availability of the phone system. Without a contractual agreement this equipment would be difficult to service and repair thus causing emotional and mental strain on the inmate population.

We are concerned with the rates families pay for inmate calls, and have spent considerable time researching and locating a provider that protects inmates from abusive or unfair rates and

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billing. We agree with the FCC that rate ceilings are necessary and would support actions to adopt rate ceilings to be enforced through individual department service provider contract negotiations.

We are regulated by Mid-Michigan Public Service Commission and our rates are defined by that governmental overseer. Therefore, we do not see any need for the added restrictions.

Isabella County is committed to providing inmate phone service that is beneficial to the inmate as well as providing the necessary security measures necessary in this type of facility. Therefore, Isabella County respectfully requests that the FCC reconsider the Billed Party Preference with regard to the need for administrative and security decisions that are required in this type of facility.

Thank you for your consideration in this matter.

Respectfully submitted,

Barry L. DeLau

Barry L. DeLau
Sheriff

c: Honorable James H. Quello
Honorable Andrew C. Barret
Honorable Rachelle B. Chong
Honorable Susan Ness
Senator Joann Emmons
Representative James McBride
Michigan Sheriff's Association

THOMAS S. GULOTTA
COUNTY EXECUTIVE

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JOSEPH P. JABLONSKY
SHERIFF

AUG 12 2 27 PM '94

MAILING ADDRESS
C.S. 1072
HICKSVILLE, N.Y. 11802

SHERIFF'S DEPARTMENT
NASSAU COUNTY CORRECTIONAL CENTER
CARMEN AVENUE • EAST MEADOW, N.Y. 11554

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AUG 17 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

July 28, 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:

Reference is made to the Billed Party Preference (BPP), here at the Nassau County Correctional Center 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. Withour inmate phones, the morale of our inmates will be devestated. 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 Sheriff's do not take responsibility for protecting inmate families from abusive rates.

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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 Sheriff's are committed to requiring rates that are fair and reasonable.

Joseph P. Jablonsky
Sheriff

JPJ:to
cc: Ralph Smith, Acting Deputy Undersheriff
Bernie Reisman, Sergeant, Communications Unit

ST. JOSEPH COUNTY
SHERIFF'S DEPARTMENT

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MATTHEW J. LORI
Sheriff

P.O. Box 339
Centreville, MI 49032-0339
Telephone (616) 467-9045
Fax (616) 467-4009

Dennis J. Allen, Undersheriff
Jim Barnes, Captain

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

August 12, 1994

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

Doc. 92-77

Dear Chairman Hundt:

This letter is written in reference to Bill Party Preference Docket Number 92-77.

This correctional facility, as well as most others, is opposed to the application of Bill Party Preference at facilities such as ours.

After many years of having considerable problems with inmates and telephone usage, a solution has recently risen to eliminate most of the problems we had experienced. The equipment designed and installed for inmate telephone calls has been carefully researched and proven. Safety and security is increased dramatically with these new systems. The new systems allow each cell in our facility to have their own phone, thus making communications available to any inmate almost 24 hours a day.

This new service also allows counties like St. Joseph to re-coop a percentage of inmate calls billed. This collected money is an important source of revenue for all concerned.

We appreciate the FCC's concern for protecting individuals from abusive rates, however, since the implementation of our system we have had two complaints concerning excessive charges. In both instances, the company who we have a contract with made adjustments to the satisfaction of the complaining individual.

I believe the Bill Party Preference will take away important security measures, which facilities have gained over the past few years. Efficiency of staff would also be reduced. Please do not adopt these regulations and interfere with our administrative and security decision making abilities.

Respectfully submitted,

Matthew J. Lori
Sheriff

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VENTURA COUNTY SHERIFF'S DEPARTMENT

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- LARRY CARPENTER
  SHERIFF
- RICHARD S. BRYCE
  UNDERSHERIFF

800 SOUTH VICTORIA AVENUE, VENTURA, CA 93009 PHONE (805) 654-2380 FAX (805) 645-1391

August 5, 1994

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

The Honorable Reed E. Hundt
Federal Communications Commission
1919 M. Street, N.W.
Washington, D.C. 202554

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

Dear Commissioner Hundt:

As Sheriff of Ventura County, California, and a jail administrator, I am requesting that the Federal Communications Commission exclude local jails from the proposed "billed party preference" system for 0+LATA payphone traffic rules.

Telephone services for inmate populations have seen a great evolution as technology changes at an ever increasing rate. While there may be alternate methods to prevent fraud under B.P.P., we would be losing our ability to closely monitor numbers called during investigations. We would also in all likelihood lose our ability to quickly block telephone calls in order to protect victims and witnesses from intimidation and harassment. These are important issues to me and citizens everywhere.

We have worked diligently and successfully to provide our inmate population with the most current technology in communication systems. Many of these acquisitions have been possible only because of the revenues the county receives as a result of our contracts for 0+Inter LATA calls. While we depend heavily on these revenues to provide modern technology and fund our inmate programs, we have always been sure to control charges by insisting on "DOMINANT CARRIER" clauses in our contracts.

Failure to exclude local detention facilities will have a dramatic, adverse effect on the services we are able to provide to our inmate population, local jails, and to the citizens of the surrounding communities.

Sincerely,

LARRY CARPENTER
Sheriff

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☐ **WEST COUNTY POLICE SERVICES**
Kenneth Kipp, Chief Deputy
800 South Victoria Avenue
Ventura, CA 93009
(805) 654-2315 FAX (805) 650-4039

☐ **EAST COUNTY POLICE SERVICES**
Robert Brooks, Chief Deputy
2101 East Olsen Road
Thousand Oaks, CA 91360
(805) 494-8261 FAX (805) 494-8295

☐ **DETENTION SERVICES**
Donald R. Lanquist, Chief Deputy
800 South Victoria Avenue
Ventura, CA 93009
(805) 654-2305 FAX (805) 654-3500

☐ **SUPPORT SERVICES**
Richard Rodriguez, Chief Deputy
800 South Victoria Avenue
Ventura, CA 93009
(805) 654-2378 FAX (805) 654-5151

LARRY A. FIELDS
DIRECTOR

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DAVID WALTERS
GOVERNOR

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

STATE OF OKLAHOMA
OKLAHOMA DEPARTMENT OF CORRECTIONS
JOSEPH HARP CORRECTIONAL CENTER

August 9, 1994

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

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

Dear Mr. Chairman:

It has come to my attention that the Federal Communication Commission is considering allowing persons who receive collect phone calls from a prisoner to choose the Long Distance carrier of their choice. I find this proposal alarming for the following reasons:

> In order to provide telephone service in a correctional setting, certain security features must be incorporated in the phone system in order to prevent continued criminal activity by the prisoner. This equipment to provide these security features is costly and is furnished by the Long Distance carrier as a condition of them being that carrier.
>
> In addition, The Department of Corrections receives a small percentage of the long distance fee, which goes back to the inmate in the form of recreational equipment.

If the decision to allow those receiving calls from inmates to choose the Long Distance carrier of their choice is made, the State of Oklahoma and every other state or federal government that supervises inmates will be out a tremendous amount of tax dollars to provide the security mandated by law.

If you have any further questions or if I can be of assistance, please do not hesitate to contact me.

Sincerely,

Steve Hargett, Warden
Joseph Harp Correctional Center

MD:kc

cc: file

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Genesee County Sheriff Department

Joe Wilson - Sheriff

1002 S. Saginaw Street ■ Flint, Michigan 48502 ■ Telephone (313) 257-3406

August 8, 1994

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

Subject: CC Docket # 92-77-Opposition to Billed Party Preference

Dear Chairman Hundt:

The Genesee County Sheriff Department is adamantly opposed to the application of Billed Party Preference (BPP), in inmate facilities.

We are a medium size county of approximately 450,000 people, and run a jail facility of approximately 550 inmates. The inmates are here for very serious and violent crimes, and we feel that we cannot allow these individuals to have freedom of access to Billed Party Preference (BPP), thus selecting a carrier of their choice.

We already provide medical needs and any other needs they desire while they are inmates here at taxpayers expense. If the application of BPP is approved, it will cause a great threat to society. We receive many complaints of inmates threatening witnesses, victims and accomplices via telephone. At the present time, we are able to control this by working closely with the carrier in our jail. We also could have a great amount of vandalism and destruction to the system if BPP is passed.

I implore you not to pass this burden to jails, and prison keepers throughout this country. If you believe there is a crime problem, and there is, please be part of the solution and not add to the problem.

Sincerely,

Joe Wilson

Joe Wilson
Sheriff

JW/js
cc: James Barcia, U.S. Representative, District 5
Bob Carr, U.S. Representative, District 8
Carl Levin, U.S. Senator
Donald W. Riegle, Jr., U.S. Senator
Dale E. Kildee, U.S. Representative, District 9
Michigan Sheriffs Association

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WEXFORD COUNTY SHERIFF DEPARTMENT

Gary A. Finstrom
Sheriff

Fred A. Harris
Undersheriff

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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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August 8, 1994

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

Dear Chairman Hundt,

The Wexford County Sheriff Department is opposed to the Application of Billed Party Preference (BPP) at our correctional facility.

We have had an on-going contractual relationship with our present carrier for several years. They were selected after careful consideration of all information at our disposal. They were also selected because they met our administrative and security requirements. To allow inmates the freedom to access any commercial carrier, would be a step backwards.

Our present equipment has specifically been designed for inmate calls and use. We have the ability to prevent/block threatening calls from pretrial inmates to witnesses or jurors, abusive calls to family members. Fraudulent and third party calling has been eliminated. It would be all but impossible for a Department our size to budget for the equipment required. Our inmate phone service, as we know it now, would be non-existent without the help and expertise of our service provider.

I, as Sheriff, am aware and sensitive to the rates charged to the families of inmates. Charge rates are an important consideration when we contract with vendors. We are concerned that BPP will circumvent our responsibility and ability to contract for the best possible phone system for our constituents.

As Sheriff, I also have a responsibility not only to inmates, their families and friends, but to Correctional staff and their ability to perform their job functions properly and as efficiently as possible. If contracted carriers were eliminated, it would affect jail security and the administrative process.

Sincerely,

Gary A. Finstrom

Gary A. Finstrom
Sheriff, Wexford County

820 Carmel St. • Cadillac, Michigan 49601 • 616-779-9211 • FAX: 616-779-0218

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SAGINAW COUNTY SHERIFF DEPARTMENT

208 S. HARRISON STREET
SAGINAW, MICHIGAN 48602
(517) 790-5400
FAX (517) 792-3401

SHERIFF TOM McINTYRE

STEPHEN C. RENICO
Undersheriff

DANIEL R. HUFF
Captain

August 9, 1994

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

Honorable Hundt:

This letter is to inform you that I am opposed to Billed Party Preference (BPP) at correctional facilities. My staff and I feel it is necessary to have a single carrier with whom we have a contract. We cannot allow prisoners 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 prison calls through a carrier we know and trust.

We have installed phone equipment designed for inmate calls, which helps prevent fraud abusive calls and other criminal activity over the phone network. We cannot afford to provide this equipment without the help of inmate phone service providers. BPP would eliminate the revenue that finances these systems. In addition, we are sensitive to the plight of families who cannot afford high rates, and would suggest that the FCC adopt ceiling rates on inmate calls and let Sheriffs enforce these rate ceilings through contracts.

I urge you to oppose BBP at inmate facilities.

Sincerely,

Tom McIntyre

Tom McIntyre, Sheriff
Saginaw County

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WILLIAM H. HACKEL

OFFICE OF THE SHERIFF

William H. Hackel
SHERIFF
Ronald P. Tuscany
UNDERSHERIFF

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August 10, 1994

Doc. 92-77

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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: Opposition to Prisoner Billed Party Preference (BPP)

Dear Chairman Hundt:

As the duly elected Sheriff of Macomb County, I am opposed to the application of Billed Party Preference (BPP) at the Macomb County. I have analyzed the security needs at our facility and have found it to be necessary to route prisoner calls from the jail to a single telephone carrier that is equipped to handle such calls and with whom we have had a contractual relationship for many years. Instead, prison calls will be routed to a number of different carriers, none of whom will have any contractual obligation to the County of Macomb.

It has become necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud abusive calls and other criminal activity. Given constant budgetary constraints, Macomb County cannot afford to provide this equipment to benefit prisoner phone service providers. BPP would eliminate the revenue stream that finances our prisoner phones. If BPP is applied to inmate facilities, there will be no way to finance these phones, nor will there be inmate phone service providers to assist us.

I am sensitive, however, to the rates innocent families pay for prisoner calls. The proper and more effective action would be to adopt rates on inmate calls and let Sheriffs enforce these rate ceilings through contracts with individual telephone company service providers. Please do not allow regulations to be adopted that will interfere with administrative and security decisions - decisions that are clearly within my discretion to best protect public interest.

Respectfully submitted,

William H. Hackel

WILLIAM H. HACKEL
Macomb County Sheriff

cc: Macomb County Board of Commissioners
WHH/jle

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Macomb County Sheriff's Office: 43565 Elizabeth Rd. • Mt. Clemens, Michigan 48043 • Phone (810) 469-5151 • FAX # (810) 469-6542