

SECRET FILE COPY ORIGINAL



LARRY V. ERICKSON
SPOKANE COUNTY SHERIFF

JOHN A. GOLDMAN, Undersheriff
MICHAEL J. AUBREY, Undersheriff
DONALD R. MANNING, Chief Criminal Deputy
JAMES J. HILL, Jail Commander
JOHN H. MCGREGOR, Patrol Captain

COUNTY-CITY PUBLIC SAFETY BUILDING
SPOKANE, WASHINGTON 99260



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AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

July 21, 1994

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

Dear Honorable Hundt,

Billed Party Preference (BPP), as we see it, threatens the controls we have on our inmate phone system and the source of funding for our Inmate Welfare Fund.

U.S. West is supplying us with equipment which will prevent three-way calling and stop fraudulent non-collectable calls. The system also provides a means of screening all calls and completing calls only to numbers approved by the Jail Administration. This allows us to prevent, or stop, harassing phone calls by inmates.

Our Inmate Welfare Fund receives money from inmate phone commissions. In return, inmates gain legal resources, educational opportunities, behavior training, recreation/relaxation items, and indigent services.

We, the Jail Administration and not the inmates, are the contracting party with U.S. West. We just don't see where BPP would help us, and we haven't asked for it.

If your concern is with the phone costs to the inmates, please consider the cost of implementing BPP since the inmates would ultimately cover that cost. Also, in Washington State, phone rates are regulated by the Washington Public Utilities Commission, which keeps the costs down for the inmates.

In conclusion, we urge you to exempt jails which have inmate phone services with the controls and benefits we have described from Billed Party Preference.

Sincerely,

LARRY V. ERICKSON, Sheriff

Captain James J. Hill
Jail Commander
Spokane County Jail

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The Honorable Rachelle B. Chona

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

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AUG 12 1994

In the Matter of

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

CC Docket 92-77

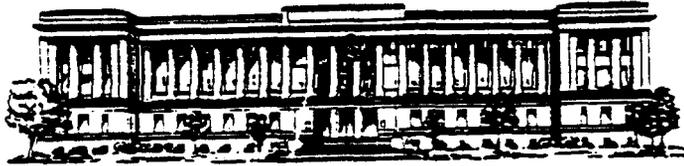
Billed Party Preference
For 0+ InterLATA Calls

Kenosha County Board of Supervisors

RESOLUTION #49

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County of Kenosha



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BOARD OF SUPERVISORS
 912 - 56th STREET
 KENOSHA, WISCONSIN 53140

FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY



RESOLUTION NO. 49

Subject: Resolution on Billed Party Preference			
Original <input type="checkbox"/>	Corrected <input type="checkbox"/>	2nd Correction <input type="checkbox"/>	Resubmitted <input type="checkbox"/>
Date Submitted: July 5, 1994		Date Resubmitted:	
Submitted by:			
Fiscal Note Attached <input type="checkbox"/>		Legal Note Attached <input type="checkbox"/>	
Prepared by: Charles R. Smith, Chief Deputy		Signature: <i>Charles R. Smith / Charles R. Smith</i> 7-5-94	

WHEREAS, the serviceable ability to provide telephone service to the inmate population of the Kenosha County Jail is a necessity for daily operation, and

WHEREAS, the current contracted provider for this telephone service affords both citizens of Kenosha County and the inmate population of the Kenosha County Jail, efficient, comprehensive, and controlled telephone service, and

WHEREAS, **Billed Party Preference, (BPP)**, reduces or eliminates effective management and control of the telephone services within the Kenosha County Jail by creating;

- The inability to control 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.
- The potential of inmates using the telephone for the harassment, including threats, of judges, witnesses or victims involved in their cases.
- The total elimination of any revenue - sharing ability between Kenosha County and the telephone service carrier. 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 Kenosha County Jail.

- 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. A protective measure and benefit that they will be unable to do for themselves.

NOW THEREFORE, BE IT RESOLVED, that the Kenosha County Board of Supervisors, in agreement with the Sheriff, are vigorously opposed to any federal interference with Kenosha County managing and controlling telephone services to the inmates in the Kenosha County Jail.

LET IT FURTHER BE RESOLVED, that any effort that will infringe on Kenosha County's Ability to provide the most manageable and effective telephone service, while generating revenue for programming is strongly opposed.

Respectfully submitted,

Legislative Committee

Ronald Johnson
Supervisor Ronald Johnson,
Chairman

Wayne E. Koessl
Supervisor Wayne Koessl, VC

Charles Huck
Supervisor Charles Huck

Kevin Krifka
Supervisor Kevin Krifka

Maureen Reed
Supervisor ~~Madone~~ Reed
maureen

Judiciary and Law Enf. Committee

Patricia A. Nelson
Supervisor Pat Nelson, Chairman

Richard Kessler
Supervisor Richard Kessler, V.C.

William Arb
Supervisor William Arb

Tony Garcia
Supervisor Tony Garcia

Raffaele Montemurro
Supervisor Raffaele Montemurro

RESOLUTION #49

Leonard Johnson

Eunice J. Boyer

Donald T. Bellow

Tony Garcia

Anne C. Berzo

Charles Hunt

~~John M. L.~~

Janice S. Marrelli

William Art.

Robert R. Carbone

Thomas Kerbman

Mark Wisniewski

Richard Ludwig

Douglas Noble

Tom J. Rose

Brenda Carey-Misske

Richard Hart

Mark Kwan

Max Mody

Mark Kwan

Daniel Haas



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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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COMMONWEALTH of VIRGINIA

Department of Corrections

RON ANGELONE
DIRECTOR

P. O. BOX 26963
RICHMOND, VIRGINIA 23261
(804) 674-3000

July 25, 1994

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

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

Dear Mr. Hundt:

I am writing on behalf of the Virginia Department of Corrections to voice this agency's opposition to Billed Party Preference (BPP); CC Docket No. 92-77, in that it does not exempt prison facilities from this rulemaking. Furthermore, based on my understanding of this pending proposal, should the Federal Communications Commission successfully institute BPP, it will represent a giant step backwards for prison systems seeking to maximize the quality of inmate telephone technology while, at the same time, increasing the cost burden to taxpayers through the virtual elimination of all negotiated phone service commissions.

We feel that our present system used for providing telephone service for inmates allows for controls that are necessary to protect inmates' families, the public, telephone operators, prison staff, government and court officials from harrasing calls and prevents inmates from perpetrating fraudulent and illegal schemes over the telephone. The system that is in place was competitively bid and provides a high degree of sophistication, i.e. the use of PIN numbers for inmates, the ability to block numbers from inmate calls, call branding so the called party knows the call is coming from a prison, call limitations, immediate access to the company providing the service to ensure prompt changes and maintenance of the system. Many other features are available on this statewide system that services all 41 Virginia Department of Corrections facilities.

Should BPP be implemented, the Department would lose the bargaining power we now have by being able to aggregate the long distance calls made by inmates. The computerized network now in place is provided by the vendor that was awarded the competitively bid contract for the service. Please note, under this contract, specific restrictions are

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placed on the charges that can be used for calls placed. It is specified that the cost cannot exceed rates as established by AT&T for inter-lata calls and rates established by the Virginia State Corporation Commission for intra-lata calls. This insures the called party against any surcharges or additional charges being added to calls placed from a prison facility.

It is our feeling, from past experience, that the local telephone companies that service many of our facilities do not have the technology to provide the kind of service and control mechanisms necessary to operate an inmate telephone system that is cost effective for the called party and provides effective system management at the prison facility level. Removal of our current inmate telephone system would be detrimental to the welfare of the inmate, would cause morale problems within the inmate population, therefore security problems for prison staff.

Again, we wish to state our opposition to prison facilities' not being exempted from the Billed Party Preference rulemaking.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ron Angelone', written over a horizontal line.

Ron Angelone

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

WAUKESHA COUNTY

DOCKET FILE COPY ORIGINAL



515 West Moreland Boulevard
Waukesha, Wisconsin 53188-2428

County Board Office

Phone: (414) 548-7002
Fax: (414) 548-7005

July 26, 1994

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

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AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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

Dear Commissioner Hundt:

Billed Party Preference is not a preferred option for the Waukesha County Jail operation. It would adversely impact our ability to efficiently manage an ever-increasing, burdensome responsibility dictated by social conditions beyond our direct control. Jails are one of county governments' more onerous mandates.

BPP represents a road block for Waukesha County in its efforts to provide a needed service at the least possible cost to the property taxpayer. It would:

1. Restrict or eliminate the ability to control inmate telephone traffic and maintain outside requests for blocked or restricted telephone numbers. Additional jail staff will be needed to replace the loss of current technology.
2. Severely reduce or eliminate the shared revenue from inmate telephone fees/costs.
3. Eliminate the number of service providers, competition among providers, and require the jail to purchase and maintain as part of the annual operations budget a security inmate telephone system.

BPP only adds to our already spiraling law enforcement costs and overburdened administrative obligations.

We respectfully request that county jails be exempt from the Billed Party Preference proposal.

Sincerely,

James T. Dwyer
Waukesha County Board Chairman

Daniel M. Finley
Waukesha County Executive

/mo

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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

COMMONWEALTH of VIRGINIA

Department of Corrections

P. O. BOX 26963
RICHMOND, VIRGINIA 23261
(804) 674-3000

RON ANGELONE
DIRECTOR

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1919 M Street, N. W.
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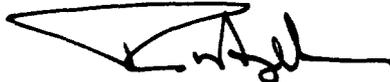
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Ron Angelone

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

WAUKESHA COUNTY

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515 West Moreland Boulevard
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1919 M Street, N.W.
Washington D.C. 20554

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Waukesha County Board Chairman

Daniel M. Finley
Waukesha County Executive

/mo

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

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DEPARTMENT OF GENERAL SERVICES

TELECOMMUNICATIONS DIVISION

601 SEQUOIA PACIFIC BOULEVARD
SACRAMENTO, CA 95814-0282
(916) 657-9903

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

July 29, 1994

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

Dear Chairman Hundt:

**LETTER IN SUPPORT OF THE POSITIONS OF THE CALIFORNIA DEPARTMENT OF CORRECTIONS
AND THE CALIFORNIA YOUTH AUTHORITY REGARDING DOCKET 92-77, BILLED PARTY
PREFERENCE**

The Department of General Services, Telecommunications Division (hereinafter TD) is writing to you to express our support of the positions of the California Department of Corrections and the California Youth Authority regarding Billed Party Preference (BPP). The TD has the overall responsibility for the development and management of all telecommunications matters relating to California State Government, and as such is deeply concerned with the impact of Billed Party Preference and the attendant difficulties that the instant proceeding may foster.

The TD has spent a great deal of time in the development of a "Master Services Agreement" that would provide the most efficient, secure and economically feasible plan to offer pay telephone services to the general public that use state facilities as well as a program that would serve the needs of correctional and law enforcement entities within the State. As a result of our efforts, a contract was awarded to MCI Corporation and GTE Corporation for the provision of these services on a statewide basis, which provides a high degree of security and fraud protection.

In the course of development of a statewide pay telephone service, the TD was extremely sensitive to the amount of fraud and abuse that has plagued this portion of the industry. Of particular concern was the amount of fraud and abuse that emanated from correctional facilities within California. As a result of our efforts we have been able to dramatically reduce the incidence of fraud, abuse and harassing and threatening telephone calls that were placed to victims, witnesses and other individuals from correctional center inmates.

During our development process, it also became clear that few of the Operator Service Providers (OSP) could offer the level of protection and fraud prevention which was requested. With this in mind, the TD is extremely concerned that if BPP is instituted as it is currently proposed, the State would now lose the ability to reduce fraud and abuse. As a result, the TD supports the positions of the California Department of Corrections and the

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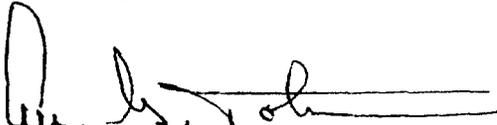
July 29, 1994

California Youth Authority that correctional institutions be exempt from offering BPP from telephones routinely used by inmates and wards.

In the past, the Federal Communications Commission has been extremely sensitive to the issue of toll fraud and abuse. California State Government shares those concerns and supports those efforts, and urges the Commission to carefully consider the potential for fraud and abuse if a universal system of security can not be offered by all OSPs under Billed Party Preference.

We look forward to working further with the Commission on these issues. If our office can provide you any assistance, or you desire further information, please do not hesitate to contact Mr. Scoop Sairanen at (916) 657-9166.

Sincerely,

A handwritten signature in black ink, appearing to read 'Allan G. Tolman', written over a horizontal line.

ALLAN G. TOLMAN, Chief
Telephone and Network Services

AGT:AAS:pr

DEPARTMENT OF GENERAL SERVICES

TELECOMMUNICATIONS DIVISION

601 SEQUOIA PACIFIC BOULEVARD
SACRAMENTO, CA 95814-0282
(916) 657-9903



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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Handwritten: E.D.
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July 29, 1994

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

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The Honorable Reed Hundt

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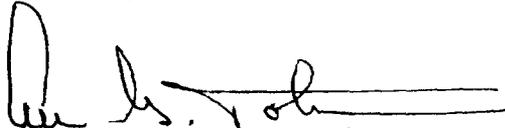
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ALLAN G. TOLMAN, Chief
Telephone and Network Services

AGT:AAS:pr



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Berks County Prison

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R.D. 1, Box 1241, County Road, Leesport, PA 19533 • (610) 208-4800

Prison Board

Chairman: **Anthony J. Carabello**, Board of Commissioners
Secretary: **William J. Campbell**, Controller
Member: **Mark C. Baldwin**, District Attorney
Member: **John H. Kramer**, Sheriff
Member: **Ernie Miller**, Chairman, Board of Commissioners
Member: **Glenn B. Reber**, Board of Commissioners
Member: **Forrest G. Schaeffer**, President, Board of Judges

Administration

George A. Wagner, Warden
Elliot S. Werst, Assistant Warden
David W. Bucks, Deputy Warden, Custody
Robert M. Nichols, Deputy Warden, Treatment
Janine L. Kroh, Director of Administrative Services

July 27, 1994

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AUG 12 1994

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

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Chairman Hundt:

I am opposed to the application of Billed Party Preference (BPP) at jail facilities.

The security and administrative needs of our jail make it necessary that all inmate calls be routed through a single carrier, which is equipped to handle inmate calls and who, because of a direct contractual relationship, will be capable of and interested in providing for us a system which is secure.

BPP will be a nightmare for the field of Corrections. Multiple carriers will have no incentive or obligation to provide for us the services upon which we depend. As a result, the specialized equipment we have come to depend upon will become unavailable or undependable during the industry's "learning curve". And, during that time, fraud, abusive calls, conspiracy, and other types of criminal activity will become prevalent.

Our institution cannot afford to purchase the hardware and software needed to administer an inmate telephone system. Faced with the possibilities for abuse, the problems associated with BPP, and the prohibitive cost of purchasing our own hardware and software systems, we may need to seriously consider removing telephone privileges from our inmates. BPP then, will be hurting inmates and causing inmate disturbances as a result of its implementation. If your concern is protecting inmates and their families from inflated rates, then rate ceilings should be adopted. Simply restricting the discretion of competent administrators, because of those who

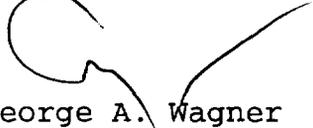
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are not, is not an effective measure. Note: All the profits from our inmate telephone system are deposited directly into the inmate welfare fund and used to directly benefit the inmates. BPP will eliminate this beneficial option for inmates.

Please, do not restrict my ability to effectively administer my institution. I ask that you give serious consideration to the negative impact BPP will have upon jails, and take steps to insure that this does not occur.

Respectfully,



George A. Wagner
Warden

GAW/all

cc: U.S. Senator Harris Wofford
U.S. Senator Arlen Specter
U.S. Representative T. Timothy Holden