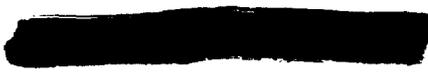




DeKalb County Sheriff's Police

HEADQUARTERS • 815-895-2765
ADMINISTRATION OFFICE • 815-895-9118 EXT. 260



OFFICE OF THE SHERIFF
DEKALB COUNTY ILLINOIS

ROGER A. SCOTT, SHERIFF

August 30, 1994

SEP 2 10 57 AM '94
RECEIVED
OFFICE OF THE SHERIFF
FCC MAIL ROOM
SEP 2 1994

DOCKET FILE COPY ORIGINAL

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

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SEP 2 - 1994
FCC MAIL ROOM

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

Dear Chairman Hundt:

I am opposed to the application of Bill Party Preference (BPP) at inmate facilities. The current system has allowed a reduction of work load on our individual correctional officers, as well as create some revenue that helps in a small way to limit tax dollars needed.

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 which 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 inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

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Furthermore, we are sensitive to the rates of inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We 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. 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 decision -- decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully,

A handwritten signature in black ink, appearing to read "Roger A. Scott". The signature is written in a cursive, somewhat stylized font.

Sheriff Roger A. Scott

RS/djp

cc: U.S. Senator Paul Simon
U.S. Senator Carol Mosely-Braun
Congressman Dennis Hastert