

King George County, Virginia



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FCC Mail Room

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December 17, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-B204
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: FCC Proceeding: Docket 12-375: In the Matter of Rates for Inmate Intrastate Calling Services, Second Notice of Proposed Rulemaking (FCC 14-158), Submitted Comments

Dear Ms. Dortch:

King George County, Virginia ("County"), on its own behalf and as a member of the Rappahannock Regional Jail Authority (RRJ), in Virginia, hereby respectfully submits its comments on various aspects and paragraphs on and of the Second Further Notice of Proposed Rulemaking for FCC Proceeding 12-375, concerning Inmate Calling Service rates and practices.

The Rappahannock Regional Jail Authority serves the jurisdictions of Stafford County, King George County, Spotsylvania Count, and the City of Fredericksburg, housing inmates in pre-trial, pre-sentence and locally responsible status.

The County joins RRJ and the Virginia Association of Regional Jails in seeking to be a constructive partner in addressing the concerns of all interested stakeholders and shares the Commission's commitment to "fair and equitable rates."

The County is concerned about the serious financial implications of the proposed rule change and the potential impact it may have on spending priorities of already financially-strained cities and counties, such as King George County. As you may be aware, the financial impact of a proposed intrastate call rate revenue share restriction is estimated to be over \$13.5 million dollars per year, just for Virginia's localities alone. This rule change comes at a time of major revenue short falls for many localities that have already had to force spending cuts of significant proportions.

If rate restrictions are imposed, further cuts to vital services, including valued services to our jail and prison inmate populations, undoubtedly will be necessary. If the rule change is implemented, hard decisions must be made that will impact every citizen; law enforcement,

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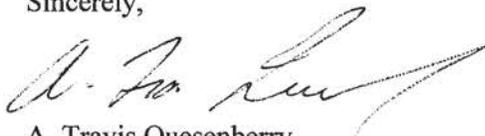
correctional services, public education, social services and public health spending may have to be sacrificed should the change be instituted.

As many states like New Mexico, Alabama, and California are moving to address the FCC's concerns within their authority, we feel that our local governments can also work with the FCC to help develop policies that address the Commission's concerns in manners that also reflect the priorities and objectives of those jurisdictions. To this point, we respectfully ask that the FCC consider the following as it considers the proposed rule change to restrict intrastate inmate call rates:

- 1) Refer to individual state utility commissions to establish policies and practices that address the concerns of the FCC; that reflect the policy priorities of the state or locality; and, most importantly, take into account the will of the governed;
- 2) Grace period implementation - If the Commission sees the need to proceed with the rule change, a grace period of 18 to 36 months is absolutely vital to prevent serious local economic dislocation. Similar federally mandated rules on localities typically have implementation periods that span years. Without a compelling governmental interest, of which none exist, there is no objective practical reason not to apply the same standard;
- 3) Cost recovery on incurred costs- As the FCC is considering allowing a narrowly defined application on incurred cost recovery allowances limited to the provision of a call exclusively, support for a more liberal definition that would include costs associated with crime interdiction and prosecution phone technologies would make sure that local law enforcement and state attorneys would continue to have access to these vital public safety tools.

King George County, Virginia continues to seek to be a constructive partner to the Commission and we appreciate the Commission's commitment in seeking our contribution and cooperating with interested parties going forward.

Sincerely,



A. Travis Quesenberry
County Administrator

Cc: Dean Lynch, Virginia Association of Counties
Arthur Scott, National Association of Counties
Maribel E. Ramos, Director of Intergovernmental Affairs
Joseph Higgs, Jr., Superintendent, Rappahannock Regional Jail
Sheriff Steve Dempsey, Chairman, Rappahannock Regional Jail Authority
Representative Robert J. Wittman
Senator Mark. R. Warner
Senator Timothy M. Kaine