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December 22, 2014

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 12-375

Dear Ms Dortch:

The Williamson County Sheriff's Office welcomes the opportunity to comment on the FCC's proposed *Rates for Interstate Inmate Calling (WC 12-375)*.

The Williamson County Sheriff's Office recognizes and concurs with the efforts the FCC has put forth to ensure the costs of inmate phone services are justified and reasonable. In our most recent contract with IC Solutions, Williamson County adopted FCC recommended interstate and intrastate call rates of \$0.25 and \$0.21 per minute for collect and prepaid calls respectively. During the bid process, surcharges were viewed unfavorably and ultimately not allowed. The cost of a fifteen minute prepaid call was reduced from \$9.00 to \$3.15. Similar savings to inmates and families were realized for all call types.

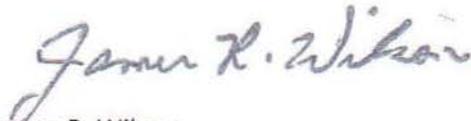
The reduced call rates together with ease of access have resulted in increased call volume while maintaining commissions. Once these rates were adopted, sharing of net profit in the form of commissions from the provider has no direct or indirect bearing on the prices paid by inmates and inmate families.

The notion put forth by some inmate calling providers that law enforcement agencies or other governmental entities are to blame for commission abuses is false. Public servants should not be ridiculed for serving the economic interests of the governing bodies they represent. Much the same as commissary commissions, revenues generated from site commissions are used to support confinement facility operations as well as the health and welfare of those incarcerated. At the same time, like all programs and services, there is a cost to providing inmate phone services. Balancing inmate costs against commissions without considering the burden to taxpayers for the continuation of any program or service would be irresponsible.

The reduction or elimination of commissions solely increases the profit margin of providers while reducing or eliminating funding for inmate welfare programs. Additional ancillary fees charged to inmates are a non commissionable revenue source to providers and have no actual relation to actual costs borne by ICS providers and have become a mechanism by which providers sustain or increase their overall revenues.

Williamson County has demonstrated its support for fair and reasonable phone service costs by reducing call rates, eliminating surcharges and reducing or eliminating ancillary fees. We cannot support the assertion by some calling service providers that the only way to reduce costs is to eliminate commissions to the taxpayer while exponentially increasing their profits. This contention can only be described as greed and does not benefit the inmates or correctional facilities.

Sincerely:

A handwritten signature in cursive script that reads "James R. Wilson".

James R. Wilson
Sheriff