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FCC Mail Room

Terry Simpson

County Judge

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December 15, 2014

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

RE: WC Docket No. 12-375 Second Further Notice of Proposed Rulemaking (Inmate Calling Services)

Dear Ms. Dortch,

Our local government is in support of reasonable inmate calling rate and fee reforms and appreciates the efforts of the Federal Communication Commission (FCC) to protect inmates and their families from paying excessive rates, fees and third-party billed products. However, of concern to us is the potential elimination of commission payments which are a vital part of our budget to ensure inmates have unlimited use of the inmate telephones which we provide as a privilege. We are aware of recent rules implemented in the State of Alabama that require reasonable rates and funding fees, but also allow for continued payment of commissions to jails and prisons. We urge the FCC to consider mirroring the overall regulation implemented in that State.

Below are just a few of the cost items we incur in offering inmate phone services to our inmates:

- Maintaining phones and monitoring maintenance of phones
- Handling US Marshal inquiries regarding contract inmate phone calls, compliance and reporting
- Bandwidth costs for offering and administering inmate phone platform.
- Storing of calls that are used for court
- Live alert transmissions costs to call investigator
- Three-way call detection verification by staff
- Prosecuting or disciplining inmates for crimes committed while using the inmate phones and visitation phones
- Visitation phones (use the same recording and security features as the inmate phones)
- Indigent calling
- Free calls to public defenders, consulates, embassies and private counsel, ombudsmen
- Free calls to bail bond companies

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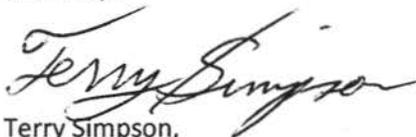
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- Free calls to facility commissary providers for ordering
- Free booking calls
- Bonding/holding phones
- Prison Rape Elimination Act (PREA) mandated voicemail systems, handling calls and reporting
- Customer service feature for inmates to report phone problems and grievances
- Free inmate voice mail broadcast from facility staff and approved contact list
- Cell phone detection and interception systems
- Free customer service system for inmates – lightens workload of facilities staff
- Transporting inmates to phones and visitation phones
- Listening to calls. After implementing caps on rates, fees and single-payment products, inmate calling will most likely double resulting in doubling the costs of listening to calls and managing inmate calling privileges
- Providing call recordings to court
- Writing Requests for proposals and handling the bidding process
- Learning how to use the inmate phone system and the myriad of security features
- Litigation resulting from inmates or the public regarding use of the phone system

Unfortunately, we feel the few inmate phone providers that proposed the FCC eliminate commissions made the recommendation to serve their own best interest, and not the best interest of the inmates and the jails.

Ms. Dortch, thank you for your consideration and understanding of our concerns and the complexities involved in offering phone services to our varying levels of adult inmates and juvenile detainees.

Sincerely,



Terry Simpson,
San Patricio County Judge

Nina Trevino,
San Patricio County Commissioner, Pct 1



Alma Moreno,
San Patricio County Commissioner, Pct 3

Fred Nardini,
San Patricio County Commissioner, Pct 2

Jim Price,
San Patricio County Commissioner, Pct 4

