

Alameda County Sheriff's Office

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Gregory J. Ahern, Sheriff

Director of Emergency Services
Coroner - Marshal

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January 16, 2015

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

RE: FCC's Second Further Notice of Proposed Rulemaking - WC Docket No. 12-375

Dear Secretary Dortch:

As the Sheriff of Alameda County, I am writing to provide background and context to inmate phone service costs which are being considered by your commission. Alameda County, California (population 1,580,000) is situated in the San Francisco Bay Area. Our county has a well-established tradition and culture based on our community partnerships, transparency, and professionalism. As such, I take my role as the Sheriff of Alameda County very seriously and work tirelessly to provide superior service to our clients. Many of those clients are inmates housed in Alameda County detention facilities.

The Alameda County Sheriff's Office has two detention and correction facilities with an average daily population count of 3,800 incarcerated inmates. Inmates incarcerated in Alameda County are provided dozens of programs and educational opportunities. Through our Inmate Services Unit, inmates are provided re-entry services, substance abuse programs, and educational/vocational classes to help them lead healthy and productive lives once released from incarceration. The mission of Inmate Services is to reduce the impact of crime on our communities by helping inmates acquire the skills, attitudes, and values needed to find and hold jobs and become socially responsible. With the provided tools, former inmates have the opportunity to make positive contributions to their families and the communities in which they live. The revenue received from the inmate phone system is the primary source of funding for these programs.

Annually the Alameda County Sheriff's Office spends over \$8,500,000 to support programs and inmate services in our detention facilities. The programs specifically provide life skills and educational opportunities to allow inmates to be contributing members of the community upon release.

An inmate calling service is not a mandated service. However, we recognize that having this service in our detention facilities allows incarcerated individuals continued contact with family

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and friends. It facilitates the inmates ability to take control of their lives once they are released. But just as important is our responsibility to protect victims and witnesses of violent crimes from further harm; prevent future criminal conduct, and to prevent contraband from being introduced into our facilities. To that end, a system such as ours, with advanced security features, allows us to provide this safety and security through proactive investigations utilizing inmate call monitoring.

I write to you in support of maintaining the current revenue model for inmate phone services. Unfortunately, the steps you are taking to eliminate phone commissions will destroy the very programs used to benefit the inmates. The California Penal Code mandates that inmate phone revenue be utilized for the betterment of the inmate population. To fulfill this requirement all of the revenue generated from telephone commissions is dedicated to providing the important programs listed above.

The Sheriff's Office supports just, fair, and competitive rates that will continue to finance these valuable and necessary educational, vocational, and re-entry programs; and that will provide for the safety and security of staff, victims, witnesses, contractors, volunteers, and incarcerated individuals within our detention facilities.

The removal of telephone commissions and in-kind payments would require the Alameda County Sheriff's Office to reduce and/or eliminate programs and services, or ask Alameda County taxpayers to foot the bill. With re-entry at the forefront for incarcerated individuals, such a loss would severely impact our ability to provide the skills and knowledge necessary to stop the cycle of recidivism.

I appreciate the efforts of the Wright petitioners and their desire to eliminate unnecessary expense from the inmate phone system. However, I respectfully point out that in Alameda County detention facilities, the revenue generated by these phone calls directly support the inmate's transition to the community.

These issues are extremely important to us, and we appreciate the opportunity to comment on them. Feel free to contact me with any questions you may have.

Sincerely,



Gregory J. Ahern
Sheriff-Coroner

GJA:cds