

PRISON POLICY INITIATIVE

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

Re: WC Docket No. 12-375
Reply to Comment from Idaho Department of Correction

We are writing to bring your attention to the misleading conclusion suggested by the Idaho Department of Correction, in their November 20, 2014 comment letter,¹ which claims that FCC regulation is driving up rates. A deeper investigation of the Idaho DOC's experience suggests that while the DOC's vendor did raise rates, the DOC simply changed vendors to one that charged *less* than the old vendor charged before — or after — the FCC's regulations on inter-state rates.

The Idaho DOC claims that the FCC's 2013 regulations resulted in higher calling rates. But while Global Tel*Link increased their rates in Idaho following the FCC's 2013 rate caps, the DOC then switched to CenturyLink, and in the process moved from a flat rate to a per-minute charge, resulting in much lower costs for any call that lasts less than 25 minutes. The DOC itself devotes a full paragraph of its comment letter to the benefits of the per-minute rates.

So, despite implications to the contrary, it wasn't your regulations that resulted in higher prices in Idaho; it was Global Tel*Link using regulation as an excuse to take advantage of the state and its customers. But this price hike was short-lived; the DOC found a better deal with CenturyLink, *who is operating under the very same FCC regulations*. In our view, the Idaho DOC's current contract shows that the regulations are actually *benefiting* customers.

Sincerely,



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¹ Available at <http://apps.fcc.gov/ecfs/document/view?id=60000987183>