

FRANK P. DENNING
SHERIFF



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DUTY HONOR SERVICE

April 9, 2015

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Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW, Room TW-A325
Washington, DC 20554

**Re: *Ex Parte* Communication
WC Docket No. 12-375; Inmate Calling Services**

Dear Ms. Dortch:

The Johnson County, Kansas, Sheriff's Office hereby files an *ex parte* communication in connection with the above-referenced proceeding. The Johnson County Sheriff's Office supports the comments and reply comments filed by the National Sheriffs' Association in this proceeding. The purpose of this filing is to submit additional information specific to this office in support of NSA's position that Sheriffs must be allowed to recover their costs if ICS services are to continue to be widely available in jails.

Inmate calling is a discretionary service in our jails and it is allowed for the benefit of inmates and their families. If we are not permitted to recover the costs associated with the provision of ICS service, then we can and we may be forced to significantly limit or eliminate altogether access to inmate phones in our jails. Currently, we have the incentive to allow significant access to ICS service and inmates are able to make calls approximately 11-12 hours per day. Denying payments to jails or restricting such payments to levels that do not at least cover our costs, will have the effect of reducing the incentive and ability to continue to allow ICS in this manner.

Our budget has not kept pace with our cost to operate in recent years. In addition to security and administrative functions that must be maintained, there are programs for inmates that we are required to maintain by law. If the cost of allowing ICS must compete with all other budget needs, it may not be funded. However, if the cost of allowing ICS has its own source of funding, it is less likely to be impacted by the budget process.

Accordingly, Sheriffs incur significant costs in allowing ICS in jails and Sheriffs must be allowed to recover their costs to be able to continue to allow ICS and to encourage the deployment of ICS in jails.

If you have any questions, please do not hesitate to contact the undersigned.

Respectfully submitted,

Sheriff Frank Denning
Johnson County Sheriff's Office