



SHERIFF OF HOWARD COUNTY
HOWARD COUNTY CRIMINAL JUSTICE CENTER
1800 WEST MARKLAND
Kokomo, Indiana 46901

Received & inspected
APR 24 2015
FCC Mail Room

April 17, 2015

EX PARTE OR LATE FILED

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

DOCKET FILE COPY ORIGINAL

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

Dear Ms. Dortch:

The Howard County Sheriff's Office hereby files an *ex parte* communication in connection with the above-referenced proceeding. The Howard County Sheriff's Office supports the comments and reply comments filed by the National Sheriffs' Association in this proceeding.¹ 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 jail 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 jail. Currently, we have the incentive to allow significant access to ICS service and inmates are able to make calls up to 12 hours per day. Denying payments to jails or restricting such payments to levels that do not cover our costs will have the effect of reducing the incentive and ability to continue to allow ICS in this manner.

With the reduction of income to the general fund for all of Howard County, Indiana and 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. We currently use the funding source for additional programs benefitting incarcerated individuals and their families. Such as the purchase of study materials, indigent haircuts a mentoring program for incarcerated peoples.

ADMINISTRATIVE OFFICE – 765-456-2020 FAX – 765-456-2145
DISPATCHER – 765-457-1105 CRIMINAL INVESTIGATIONS – 765-456-2031
JAIL – 765-456-2026 RECORDS – 765-456-2024

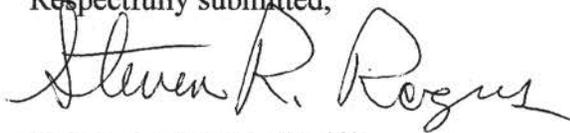
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Accordingly, Sheriffs incur significant costs in allowing ICS in jails, and Sheriffs must be allowed to recover their costs to be able to continue to allow ICS and to encourage the deployment of ICS in jails.

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

Respectfully submitted,

A handwritten signature in cursive script that reads "Steven R. Rogers". The signature is written in black ink and is positioned above the typed name.

Steven R. Rogers, Sheriff
Howard County, Indiana

¹ See *Reply Comments of the National Sheriffs' Association* (Jan. 27, 2015); *Comments of the National Sheriffs' Association* (Jan. 12, 2015); *Reply Comments of the National Sheriffs' Association* (Jan. 13, 2014); *Comments of the National Sheriffs' Association* (Dec. 18, 2013); Letter to Marlene H. Dortch, Secretary FCC, from Sheriff (ret) Aaron D. Kennard, Executive Director NSA, *et al.* (Oct. 30, 2013); Letter to Marlene H. Dortch, Secretary FCC, from Sheriff Larry D. Amerson, President NSA (Mar. 25, 2013).