



AMERICAN CORRECTIONAL ASSOCIATION

206 NORTH WASHINGTON STREET, SUITE 200 • ALEXANDRIA, VIRGINIA 22314

703 • 224 • 0000 FAX: 703 • 224 • 0010

WWW.ACA.ORG

June 24, 2015

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

Re: Ex Parte Communication
WC Docket 12-375
Inmate Calling Services

Dear Ms. Dortch:

On Tuesday, June 16, 2015, the American Correctional Association (ACA) met with Commissioner Mignon Clyburn; Rebekah Goodheart, Wireline Advisor to Commissioner Clyburn; Daniel Alvarez, Wireline Advisor to Chairman Wheeler; Lynne Engledow, Acting Deputy Chief, Pricing Policy Division, WCB; and Misha Guttentag, Intern, Commissioner Clyburn's office to discuss Inmate Calling Services. Present from the American Correctional Association were James A. Gondles, Jr., Executive Director; Jeff Washington, Deputy Executive Director; and Eric L. Schultz, Jr., Director of Government & Public Affairs.

During this meeting, ACA staff discussed the need for corrections and providers to work together to provide inmate calling service at reasonable and just rates. ACA emphasized the importance of communication between offenders and family in the reentry process. ACA also talked about the distinct differences between jails and prisons and the importance of taking into consideration all relevant costs. However, ACA admitted to being uncertain about the need for any of the additional fees and/or ancillary costs. ACA staff would need to conduct a more thorough review of the record in this proceeding in order to better understand those costs. ACA expressed its belief that sheriffs and jail administrators would never pull ICS out of the jails completely, that it was an integral part of correctional business and a necessary service for inmates.

ACA submitted for the record of the proceeding, a copy of its *Public Correctional Policy on Adult/Juvenile Offender Access to Telephones* which its governing bodies adopted in 2001 and have reaffirmed.

ACA staff expressed support for a phasing in of any new rates over a two or three year period.

Respectfully Submitted,

James A. Gondles, Jr., Executive Director
American Correctional Association



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*Public Correctional Policy on
Adult/Juvenile Offender Access to Telephones
2001-1*

Recognizing that there is no constitutional right for adult/juvenile offenders to have access to telephones, nonetheless consistent with the requirements of sound correctional management, adult/juvenile offenders should have access to a range of reasonably priced telecommunications services. Correctional agencies should ensure that:

- A. Contracts involving telecommunications services for adult/juvenile offenders comply with all applicable state and federal regulations;
- B. Contracts are based on rates and surcharges that are commensurate with those charged to the general public for like services. Any deviation from ordinary consumer rates should reflect actual costs associated with the provision of services in a correctional setting; and
- C. Contracts for adult/juvenile offender telecommunications services provide the broadest range of calling options determined to be consistent with the requirements of sound correctional management.

This Public Correctional Policy was unanimously ratified by the American Correctional Association Delegate Assembly at the Winter Conference in Nashville, Tenn., Jan. 24, 2001. It was reviewed and amended at the Winter Conference in San Antonio, TX, Feb. 1, 2011.