



1135 PROFESSIONAL COURT | HAGERSTOWN, MD 21740-5853
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October 15, 2015

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

RE: WC Docket No. 12-375 (Rates for Interstate Inmate Calling Services)

Dear Madam Secretary:

On behalf of the American Jail Association, we write today to offer AJA's comments on the above referenced proceeding.

The American Jail Association (AJA) is a professional, nonprofit membership organization representing more than 6,400 Jail Administrators and corrections professionals in the United States. Our mission is to focus solely on Jails and the people who operate them.

Throughout the course of this proceeding, AJA Leadership and Staff have examined the issue of fair, just, and reasonable rates for Inmate Calling Services (ICS). We have gone on record in support of ICS in our facilities as an integral part of inmate reintegration into the community, and, just as importantly, as an essential tool in the overall operation of the jail. We have made the point that rates should be set at a point that will attract ICS providers and allow for cost recovery to the jails for direct costs in providing services.

We appreciate the work the FCC has been doing to arrive at a workable solution to ICS and would urge the Commission to continue to consider the unique needs of jails as it reaches its decision. Specifically, we encourage the FCC to set rates that take into account:

- The demographic of Jail facilities, including size of facility, staffing, and geography.
- Rates that differentiate between Jails and prisons.
- Rates that support cost recovery for ICS-related costs
- A phased in period to allow for jurisdictions to make the necessary financial adjustments of at least two budget cycles.

AJA supports fair and just ICS calling rates for all stakeholders and will work with the Commission's office towards finding a solution that allows phone services to continue for the benefit of the facility, the benefit of the inmates and their families, and for the benefit of the general public.

Sincerely,

A handwritten signature in black ink that reads "Robert J. Kasabian".

Robert J. Kasabian, MBA
Executive Director