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Received & Inspected
OCT 26 2015
FCC Mail Room

October 21, 2015

VIA ELECTRONIC FILING

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

Re: Rates for Inmate Calling Services (Docket No. 12-375)

Dear Secretary Dortch:

I am writing to encourage the Commission to pass the important proposal put forward by Chairman Wheeler and Commissioner Clyburn to reform our nation's inmate calling services (ICS). Our existing system causes serious financial strain, prevents people who are incarcerated from remaining connected to their families, and makes it difficult for inmates to engage in reentry planning by exploring employment and housing options. We must do better.

The proposal before you places important caps on ICS rates and on the additional service charges that significantly increase the cost of a call. Here in Massachusetts, ICS providers may now charge a $3.00 per-call surcharge, in addition to a rate of $0.10 per minute, for intrastate calls. Thus, a 15-minute telephone call can cost $4.50, or $0.30 per minute. In some facilities, there is a significant additional service fee for a prepaid account. When you factor that in, data my office has reviewed indicates that the cost to a family of a 15-minute daily phone call can exceed $160 per month, not including dropped calls. Indeed, according to one family member in a case pending before the Massachusetts Department of Telecommunications and Cable (D.T.C. 11-16), "I worked seven days a week at two jobs during much of my husband's incarceration so I could afford to pay the extra $200-$250 that the calls from my husband cost me each month over my regular telephone bill." Turner Aff. Ex. A-10, ¶ 4.

I also applaud the discouragement of "site commissions," through which telephone companies agree to pay a portion of their profits back to correctional facilities (anywhere from 25% to 60% of the companies' gross revenues in Massachusetts). Those commissions have resulted in hundreds of thousands of dollars of profits each year for our county facilities in Massachusetts, and millions for our state Department of Corrections. While some of that money funds programs that benefit prisoners, such programming should not be dependent on telephone

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fees. My office is committed to working with stakeholders across the system to identify a better alternative.

Despite the significant profit made on these calls, inmates and their family members routinely report poor quality of service, with frequent dropped calls, static on the line, difficulty hearing, and long periods of silence at the beginning of a call. Compounding those issues are allegations of poor customer service, broken and malfunctioning equipment, and excessive replaying of recorded announcements and warnings during calls, all of which results in more calls at greater expense.

It is time we remove this heavy burden on family members, who shoulder the expense, often while struggling to lead a household. This is also a matter of public safety; studies have shown that allowing people who are incarcerated to maintain contact with their loved ones results in better post-release outcomes and reduces recidivism.

The proposal to set fairer and more affordable ICS rates across the country is an important step forward, and there is more work to be done at the state level to build upon it. I urge the Commission to vote favorably upon these reforms, and to permit stricter state regulation where justified.

Very truly yours,

Maura Healey

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