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Video visitation offers security enhancements over in-person visiting and often increases the frequency with which inmates may enjoy visitation privileges. Given the massive changes to ICS just implemented by the Second Report and Order, we urge the Commission to refrain from regulating these media. This new technology should not be impeded or disadvantaged by unwieldy regulation and facilities should be given a meaningful chance to adjust to pending orders. Capping rates on video calling services could stop this promising new technology in its tracks to the detriment of facilities and inmates.

### **International Calling**

The frequency with which international calls are made likely varies among California jails based upon a number of factors. As such, the costs and requirements of providing international ICS potentially vary by facility. Just as we have previously argued that facilities need flexibility to recover costs surrounding intrastate and interstate calling, imposing across-the-board rates on international calling could unnecessarily impose burdens on facilities. Again, given all the pending changes relative to ICS rates and regulation, we would urge the Commission to let facilities and providers settle into the new system before considering significant changes again.

We appreciate the ongoing opportunity to comment on these important matters. We urge the Commission's caution as it relates to the above. Facilities are about to face once-in-a-generation difficulties as a result of the Second Report and Order capping rates and discouraging site commissions. Please do not exacerbate the coming challenges with additional regulation that will likely harm, not help, inmate access to quality and affordable calling services.

Respectfully submitted,



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Sheriff, Amador County

MR/cmc

cc: The Honorable Dianne Feinstein, United States Senator  
The Honorable Barbara Boxer, United States Senator  
California Congressional Delegation  
All California Sheriffs  
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