

**Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of:)	
)	WC Docket No. 12-375
)	
Rates For Interstate Inmate)	
Calling Services)	

**COMMENTS OF
THE WRIGHT PETITIONERS,
THE D.C. PRISONERS' LEGAL SERVICES PROJECT,
AND
CITIZENS UNITED FOR REHABILITATION OF ERRANTS,**

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SUMMARY

Justice too long delayed is Justice denied.

Martin Luther King, Jr.'s words have guided the efforts of the Petitioners since they first filed their lawsuit in 1999 to eliminate exclusive contracts between private prisons and telephone service providers. The Petitioners witnessed their suit referred to the FCC, where it languished through rounds of comments and years of inaction.

Through the leadership of Commissioner Clyburn, the FCC granted the Wright Petition for Rulemaking in December 2012, and initiated the third phase of the battle to eliminate unjust, unreasonable and unfair Inmate Calling Service rates and ancillary fees. In August 2013, the FCC adopted rate caps on interstate calls, and sought comment on additional steps to protect ICS customers. Following two rounds of comments, the FCC adopted the groundbreaking Second Report and Order in October 2015, which adopted uniform rates for both interstate and intrastate calls, a tiered structure to differentiate between prisons and jails, and caps on certain permissible ancillary fees.

The FCC also correctly noted that its work was not done. In issuing the Third Further Notice of Proposed Rulemaking, the FCC sought to cross the T's and dot the I's in order to prevent its newly-adopted rules from being undermined. As set forth below, the Petitioners urge the FCC to take steps to introduce competition in the ICS marketplace and to address rates and ancillary fees for international ICS calls. We also support the adoption of rules that require the submission of comprehensive cost and revenue information, along with the submission of ICS contracts. Finally, in light of the ongoing consolidation within the ICS marketplace, the Petitioners urge the FCC to adopt rates and ancillary fees for video visitation and related services, and close any loopholes that permit ICS providers to pass through excessive fees.

By taking these steps, the FCC can deliver justice after 17 years, and ensure that future ICS consumers will not experience the long history of unjust, unreasonable and unfair rates and ancillary fees.

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COMMENTS

Dorothy Wade, Annette Wade, Ethel Peoples, Laurie Nelson, Winston Bliss, Sheila Taylor, Katharine Goray, Ulandis Forte,¹ Charles Wade, Earl Peoples, Darrell Nelson, Melvin Taylor, Jackie Lucas, Peter Bliss, David Hernandez, Lisa Hernandez, Vendella F. Oura, along with The D.C. Prisoners’ Legal Services Project, and Citizens United for Rehabilitation of Errants, (jointly, the “Petitioners”) hereby submit these Comments in connection with the Third Further Notice of Proposed Rulemaking with the above-captioned proceeding.²

The FCC has made tremendous progress in its goal to ensure that Inmate Calling Service (ICS) customers no longer have to pay unjust, unreasonable and unfair ICS rates and ancillary fees. The *First R&O* established a hard cap on the fees charged for interstate ICS calls, and the *Second R&O* adopted rules to cap ICS rates and ancillary fees. The *3rd FNPRM* raises questions on a discrete number of remaining issues, and the Petitioners are pleased to provide responsive comments. Since November 2001, when the FCC was referred the matter at the request of the ICS providers of the day, the Petitioners have been urging the FCC to adopt and enforce

¹ Martha Wright, the grandmother of Ulandis Forte, passed away January 18, 2015.

² *Rates for Interstate Inmate Calling Services*, Second Report and Order and Third Further Notice of Proposed Rulemaking, 30 FCC Rcd 12,763 (2013) (individually, the “*Second R&O*” and “*3rd FNPRM*”). The *3rd FNPRM* was published in the Federal Register on December 18, 2015, establishing January 19, 2016 as the deadline for comments. *See also Rates for Interstate Inmate Calling Services*, Report and Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd 14107 (2013) (individually, the “*First R&O*” and “*FNPRM*”) and *Rates for Interstate Inmate Calling Services*, Second Further Notice of Proposed Rulemaking, 29 FCC Rcd 13,170 (2014) (“*Second FNPRM*”).

comprehensive rules to reform practices and charges by ICS providers, which have led to almost two decades of unjust, unreasonable and unfair ICS rates and ancillary fees.

As discussed herein, the FCC must review the responses to the issues raised in the *3rd FNPRM*, and adopt rules that will close the loop on the egregious practices of ICS providers and their vendors. In particular, the Petitioners urge the FCC to (i) take steps to encourage a competitive ICS marketplace; (ii) adopt rules and rate caps relating to video visitation and other bundled services; (iii) require annual mandatory data collection submissions, including both cost and revenue information; (iv) establish a docket that will receive all ICS contracts; (v) extend the adopted rate and ancillary fee caps to International calling; and (vi) prohibit the pass-through of all financial transaction fees – both by affiliates of ICS providers and third-parties.

DISCUSSION

I. COMPETITION IN THE ICS INDUSTRY.

In the *3rd FNPRM*, the FCC renews its call for comments on different approaches to introduce competition into the ICS market. Noting the overwhelming evidence in the record that the ICS industry is a marketplace failure, the FCC seeks proposals “to promote competition within the ICS market to enable the FCC to sunset or eliminate our regulations adopted herein in the future.”³ The FCC correctly notes that the Petitioners have been calling for the introduction of competition in the ICS market for more than 15 years, and in fact, this goal served as the basis for Martha Wright and the Petitioners to file the original lawsuit.⁴

As noted in the *3rd FNPRM*, both the ICS providers and the correctional authorities have rejected any effort to introduce competitive ICS service at a particular facility. While there

³ *3rd FNPRM*, 30 FCC Rcd at 12,900.

⁴ *Id.* (citing *Petition for Rulemaking Or, In the Alternative, Petition To Address Referral issues In Pending Rulemaking*, pg. 2, filed Oct. 31, 2003).

may be different vendors providing different services,⁵ the Petitioners are not aware of any instance in the US where there is more than one ICS provider that is authorized to provide competing ICS services at a particular correctional facility.

Instead, the pace of consolidation within the prison-industrial complex has accelerated in recent years, resulting in attempts by ICS providers to serve all aspects of the correctional authorities' needs at the facility. For example, in 2015, Securus Technologies acquired JPay Inc., of the largest commissary companies serving prisons and jails.⁶ Another large conglomerate – Keefe Group – owns an ICS provider – ICSolutions – which provides telephone and video visitation services, and also owns the largest commissary service company – Keefe Commissary Network – along with Access Corrections – which provides payment, email, photo and other entertainment services.⁷

In addition, GTL provides a menu of services, including ICS telephone, investigative services, facility management solutions, in-person and video visitation management, payment and deposit solutions and educational content solutions.⁸ Telmate also offers a laundry list of services – dubbed, the Telmate Ecosystem – which includes telephone, video visitation,

⁵ *3rd FNPRM*, 30 FCC Rcd at 12,901, nt. 1016 (*citing* GTL's Second FNPRM Comments). Petitioners note that GTL's comments do not state there is more than one ICS provider at a particular facility, but rather, that multiple companies provide distinct services at that facility.

⁶ *See Securus Technologies, Inc. Completes Transaction to Acquire JPay Inc.*, Press Release (July 31, 2015) (<http://tinyurl.com/h3cf8s2>) (merger will “provide the ultimate platform for digitized payments, communications, entertainment and education in the correctional space.”).

⁷ *See Keefe Group – Companies*, www.keefegroup.com/companies-101 (“Today, Keefe is comprised of six operating companies, each focused on distinct aspects of commissary operations: Keefe Supply Company, Keefe Commissary Network, Access Securepak, Access Corrections, ICSolutions and Advanced Technologies Group.”)

⁸ *See GTL – Services*, <http://www.gtl.net/correctional-facility-services/> (“We are committed to pushing the envelope on how technology can help improve virtually every aspect of your operations, including the day-to-day experiences of everyone in the corrections ecosystem: staff, inmates, family and friends. From the hardened exteriors of our kiosks, phones and other in-pod devices to the reliability and security of the software that powers our solutions, everything we provide is designed from the ground up with the rigors of the corrections environment in mind.”). *See also GTL Second FNPRM Comments*, filed Jan. 12, 2015, pgs. 40-44 (discussing GTL Genesis service).

voicemail, email, messaging, photo sharing and education services.⁹ Even ICS providers that primarily focus on jails, such as Pay Tel Communications¹⁰ and NCIC,¹¹ offer correctional authorities a suite of services beyond just ICS telephone calls.

Thus, the trend in the prison-industrial complex is for each company to promote itself as a one-stop shop for a correctional facility. As discussed below, recent bid proposals submitted to correctional facilities offer a bundle of services, and the companies compete to make the best offer to win the contract with the correctional facility. Importantly, these bundled contracts include the sharing of revenue earned on both ICS and non-communication services, which is one of the main reasons that the Petitioners advocated for the FCC to avoid involving itself with regulating site commissions. As we noted, the FCC would not be able to get a firm handle on the many ways that these companies could share their revenue with the correctional facilities as these services expanded to cover additional services, and the FCC's determination to not ban site commissions was appropriate.

In light of these trends, and in order for the FCC to meet its goal in promoting competition in the ICS market, the FCC must focus on developing rules to re-structure the ICS market so that it delivers just, reasonable and fair rates and ancillary fees for consumers.

Previously, the Petitioners filed comments urging the FCC to adopt ICS access rules similar to the Inside Wiring and Exclusive Contract rules for multi-dwelling units.¹² In those proceedings, the FCC prohibited anti-competitive practices that prevented new entrants "from

⁹ See *Telmate Ecosystem* – <http://www.telmate.com/the-telmate-ecosystem/>.

¹⁰ See *Pay Tel Communications – Products and Services*, <https://www.paytel.com/interested-facilities/products-and-services/> (offering jail management, visitation, kiosk, messaging and ICS telephone services).

¹¹ See *NCIC* - <https://www.ncic.com/ice.htm> (offering voicemail, commissary, jail management services).

¹² *Petitioners FNPRM Comments*, filed Dec. 10, 2013, pg. 17. See also *Exclusive Service Contracts For Provision of Video Services in Multiple Dwelling Units and Other Real Estate Developments*, 22 FCC Rcd 20,235 (2007), *aff'd sub nom. Nat'l Cable & Television Ass'n v. FCC*, 567 F.3d 659 (2009). See also *Telecommunications Services Inside Wiring: Customer Premises Equipment*, 22 FCC Rcd 10,640, 10,641 (2007).

competing for consumers in multi-unit buildings based on regulatory technicalities or costly and inefficient industry practices.”¹³ The Petitioners noted that correctional authorities differentiate ICS providers almost exclusively on which company will promise to pay the highest site commission, so it must be correct that the service offerings by the ICS providers are largely uniform.

As such, the Petitioners suggested that the FCC adopt rules to prohibit exclusive contracts and other practices that prevent competition at a correctional facility. Correctional authorities could create a list of required security measures that all ICS providers seeking to provide service must agree to provide, and then permit ICS customers to select a provider of their choice. While there would be additional steps in setting up this structure, the competition among ICS providers for customers would lead to lower ICS rates and fees.

In response, correctional authorities and ICS providers uniformly rejected the idea of multiple ICS providers at a particular facility, with the ICS providers indicating that they would likely not bid to serve under a competitive regime, and correctional authorities stating that they “would likely eliminate ICS rather than allowing multiple ICS vendors.”¹⁴ On the other hand, HRDC correctly notes that, until there is competition among ICS providers at a particular correctional facility, “the discussion will continue to revolve around ways to gouge consumers and extract money from them – not on how to deliver the best, most cost-efficient ICS services to prisoners and their families.”¹⁵

One way to reach this goal is to establish rules under which a correctional authority’s service provider does not offer service directly to ICS customers. Instead, the FCC would create two separate classes of ICS — wholesale and retail. Wholesale providers would respond to a correctional authority’s request for proposal, and the successful wholesale provider would be

¹³ 22 FCC Rcd at 10,641 (2007).

¹⁴ 3rd FNPRM, 30 FCC Rcd at 12,901.

¹⁵ *Id.*, nt. 1015 (citing HRDC July 29, 2015 Ex Parte Letter, at pg. 8).

responsible for installing equipment at the facility, but it would not be authorized to provide retail service at the facility, either directly or through subsidiaries. The wholesale ICS provider would provide a standardized level of service satisfying the facility's requested security biometrics and call monitoring capability. As a result, the correctional authorities would maintain their existing level of security for ICS.

Furthermore, the wholesale provider (or correctional facility) would be responsible for installing and maintaining payment kiosks, video visitation/video phone equipment (collectively, "video visitation"), and inmate ICS end user services/equipment, but retail ICS providers would be guaranteed equal access to all such equipment without barriers to provide retail ICS to their customers. The wholesale ICS provider would establish a demarcation point or permit colocation at the facility.

Under this structure, correctional authorities would contract with one wholesale ICS provider, and ICS customers would be permitted to choose among retail ICS providers for the lowest rates and fees. After establishing a rate structure for the wholesale ICS providers to charge retail ICS companies, the FCC would then avoid involving itself in the state and local bidding processes. Moreover, the FCC would have created the direct relationship between ICS providers and their customers, and would permit consumers to choose an ICS retail provider that best meets their needs.

This proposal tracks the steps taken by the FCC to promote facilities-based retail competition in the wireline local telephone market. The FCC could create competition in the ICS industry by mandating equal access to ICS site-based services at wholesale rates, with ICS customers finally getting the opportunity to choose their service provider and reap the associated economic advantages arising from competition in the marketplace.

The Petitioners acknowledge that this proposal suggests a significant overhaul to the ICS rules and the prison-industrial complex, and we urge the FCC to fully implement the rate and

ancillary fee caps adopted in the *Second R&O* while it studies this proposal in more detail.¹⁶ However, the FCC was directed by Congress to “promote competition and the widespread deployment of payphone services,”¹⁷ and correctional authorities steadfastly argue that dealing with separate ICS providers is too costly. Maintaining a structure whereby correctional authorities deal only with one entity would eliminate this concern, and creating a competitive marketplace for ICS customers would serve the public interest.

The alternative, of course, is that ICS providers and correctional authorities acknowledge (i) that the current ICS structure does not promote competition, (ii) that their practices have led to unjust, unreasonable and unfair rates being charged to ICS customers, and (iii) that the appropriate and legally sustainable solution is to accept the FCC’s authority to cap ICS rates and ancillary fees as set forth in the *Second R&O*.

Stated another way, if the prison-industrial complex seeks to maintain its current structure – with each company offering to provide a complete suite of services on the condition that it is the sole provider at particular correctional facility – it must, at the very least, acknowledge that their practices do not ensure just, reasonable and fair ICS rates and fees, and accept the FCC’s steps taken in the *Second R&O* to protect ICS consumers.

II. THE FCC MUST ENSURE THAT ICS PROVIDERS DO NOT GOUGE VIDEO VISITATION CONSUMERS.

As noted above, companies providing ICS telephone service are increasingly bundling additional services to provide to correctional facilities and inmates. GTL, Securus, ICSolutions, Telmate, Pay Tel Communications and NCIC all offer a suite of services, including video visitation. The *3rd FNPRM* seeks additional information regarding video visitation, including whether the FCC should adopt caps on rates and ancillary fees charged for video visitation

¹⁶ *Id.*, at 12,902 (“should the Commission, as suggested, first adopt rate and ancillary service charge reform and then determine if additional steps are necessary and perhaps revisit the idea of intra-facility competition then.”).

¹⁷ *Id.* at 12,901 (citing 47 U.S.C. § 276).

services.¹⁸ The FCC notes that it has already determined that its authority to regulate ICS is technology neutral, and seeks comments on whether regulation is necessary.¹⁹

The *3rd FNRPM* raises a variety of questions for which the answers could only come from the service providers and/or the correctional facilities. For ease of reference, the Petitioners prepared a table to document the questions to which that providers and correctional authorities must respond if the FCC is to obtain a full record.²⁰ As discussed below, the Petitioners and other organizations have sought to obtain detailed information from correctional authorities, but have run into substantial difficulties obtaining the requested information. Since the correctional authorities and the service providers have that information in their possession, the Petitioners are hopeful that they will respond to the questions posed in the *3rd FNRPM* and provide the FCC with the requested information.

Further, the Petitioners urge the FCC to vigorously review the cost data it requested from the ICS providers in the *3rd FNPRM* and adopt rules that prevent ICS providers from shifting the impact of the soon-to-be eliminated unjust, unreasonable and unfair ICS telephone rates and ancillary fees onto video visitation consumers. The record indicates that, much like current ICS telephone customers, video visitation consumers often do not have a choice of whether they can use the service, and certainly have no choice among service providers.²¹ Where correctional facilities have urged the elimination of in-person visits, the only way for families and loved ones to remain in contact is through the services offered by the ICS providers. Therefore, in light of

¹⁸ *Id.*, at 12,906.

¹⁹ *Id.* (citing *Second R&O*, 30 FCC Rcd at 12,884, and *First R&O*, 28 FCC Rcd at 14115).

²⁰ See Exhibit A.

²¹ There is also evidence that new requests for proposal issued by correctional authorities seek both video visitation and telephone service. See, e.g., *Douglas County Sheriff's Office (Jail Telephone and Video Visitation, RFP No. 077, August 2015* (<http://tinyurl.com/gmc8zjm>). There is also evidence that existing agreements for ICS telephone service are being cancelled to make way for bundled services. See *Minutes Of Meeting Of The Commissioners Court Of Midland County, Texas*, pgs. 4-5, Sept. 28, 2015 (cancelling existing Inmate Telephone Contract with ICSolutions that paid 66.6% commission, and awarding a new telephone and video visitation contract to Securus, which would pay 80.3% commission on telephone and 50% on remote video visitation) (<http://tinyurl.com/h6zmlc>).

the lack of competition, and the apparent use of monopoly power by the ICS providers in the facilities they serve, the Petitioners support the review of the providers' cost data that was specifically requested by the FCC in the *3rd FNPRM*, and the adoption of a just, reasonable and fair cap on ICS video visitation rates and ancillary fees.

1. Video Visitation Availability and Rates.

The Petitioners have previously noted that it is very difficult to obtain rate and cost data for the services provided by the ICS companies. Other commenters have noted the same difficulty, and have highlighted steps taken by ICS companies to prevent the disclosure of rates, costs, and the executed contracts between providers and correctional authorities.²² The same difficulties exist for obtaining information regarding video visitation contracts. Because the rates and site commissions are established through the RFP process, third-parties seeking detailed information regarding these arrangements must go through the time-consuming and costly process of approaching each correctional facility and/or governmental unit to obtain the information.

With these difficulties in mind, the Petitioners have prepared the information as Exhibit B regarding the video visitation offerings of the various ICS providers. In particular, the Petitioners have researched and compiled service availability and rate information found on the Internet for video visitation services offered by Securus, JPay (now part of Securus), ICSolutions, and GTL (through its subsidiary Renovo Software).²³ Although not readily available on the ICS providers' websites, the Prison Policy Initiative has provided information regarding the ancillary fees that are added to the per-use fee.²⁴

²² See *HRDC July 30, 2015 Ex Parte Submission*.

²³ It is also not clear that the rates that are listed on the companies' websites reflect the rates in their contracts with the correctional authorities. According to the Prison Policy Initiative (<http://www.prisonpolicy.org/visitation/report.html>), ICS providers often charge promotional rates for unspecified periods of time which eliminates the consumer's ability to accurately predict how much they will be charged.

²⁴ *Id.* at Figure 8 and Exhibit 11.

What is obvious, though, is that the same divergent range of rates that existed in the ICS telephone service also exists in the ICS video visitation service. For example, Securus charges \$5.00 for a 20-minute remote session for friends and family located in Boone County, Illinois, but charges \$20 for that same length of time in Adams County, Illinois. ICSolutions also charges a range of rates for its service, as does JPay. GTL (through Renovo) does not make its rates available to the public on a consistent basis, so it is very difficult to provide similar information. The Petitioners expect that the providers respond to the FCC's request for detailed rate and cost information so the public (and the FCC) can thoroughly consider these issues. At first glance, though, it would appear that there does not seem to a standard rate charged by companies offering video visitation services, thus indicating that further FCC action will likely be necessary.

2. The FCC Must Regulate Video Visitation Rates and Fees.

The FCC correctly noted in the *3rd FNPRM* that close scrutiny of video visitation services will be necessary, especially if ICS providers are replacing “traditional” ICS telephone service and in-person visits with their suite of bundled services including video visitation services.²⁵ To the extent that providers are encouraging the elimination of in-person visits, and shifting the means by which inmates remain in contact with their family from ICS telephone to video visitation services – thus avoiding the caps on ICS rates and ancillary fees adopted in the *Second R&O* – the FCC must step in and ensure that the rates and fees charged for video visitation services are just, reasonable and fair. The Communications Act, as amended, provides ample authority for it to do so.

First, there is no question that the FCC has the authority to regulate interstate communications to ensure that “charges, practices, classifications, and regulations” are “just

²⁵ Examples of this practice of eliminating in-person visitation at the insistence of ICS providers were documented by the Prison Policy Initiative (Texas) and Illinois Campaign for Phone Justice (Illinois). See *3rd FNPRM*, at 12,905. While the Texas Legislature passed legislation to require in-person visitation (HB 549), exemptions from the requirement have been sought by more than 25 counties (<http://tinyurl.com/gm8ad88>).

and reasonable.²⁶ Pursuant to Section 152(a) of the Communications Act, as amended, the FCC is authorized to regulate “all interstate and foreign communications by wire or radio.”²⁷ Thus, the US Court of Appeals has confirmed that “the Act confers broad powers on the FCC to regulate all aspects of the interstate telecommunications market.”²⁸

Moreover, the FCC has “broad authority to take actions that are not specifically encompassed within any statutory provisions but that are reasonably necessary to advance the purposes of the Act.”²⁹ In fact, the Supreme Court has affirmed the FCC’s use Section 201 of the Act to adopt rules affecting intrastate communications when it implemented the Telecommunications Act of 1996,³⁰ and has permitted the FCC to issue regulations where separating interstate and intrastate communications was impossible or impractical.³¹ The FCC does not need to wait for congressional action to preempt intrastate regulations when it acts “within the scope of its congressionally delegated authority,”³² and demonstrates that, absent preemption, “the state regulation negates a valid federal policy.”³³ Also, where interstate and intrastate services are bundled together, the FCC has authority to regulate the intrastate service as well.³⁴

²⁶ 47 U.S.C. § 201; *See also NARUC v. FCC*, 746 F.2d 1492, 1498 (D.C. Cir. 1984).

²⁷ 47 U.S.C. § 152(a).

²⁸ *NARUC*, 746 F.2d at 1498.

²⁹ *See Continental Airlines*, 21 FCC Rcd 13,201, nt. 112 (*citing, inter alia, AT&T Corp. v. Iowa Utils. Bd.*, 525 US 366 (1999)).

³⁰ *See AT&T Corp*, 525 US 366 (“Since Congress expressly directed that the 1996 Act, along with its local competition provisions, be inserted into the Communications Act of 1934, 1996 Act, §1(b), 110 Stat 56, the Commission’s rulemaking authority would seem to extend to implementation of the local-competition provisions.”)

³¹ *See Louisiana Public Service Commission v. FCC*, 476 US 355, 368-369 (1986).

³² *Id.*, 476 US at 369 (*citing Fidelity Federal Savings & Loan Assn. v. De la Cuesta*, 458 U.S. 141 (1982); *Capital Cities Cable, Inc. v. Crisp*, 467 U.S. 691 (1984)).

³³ *National Ass’n of Regulatory Utility Commissioners v. FCC*, 880 F.2d 422, 425 (1989).

³⁴ *Illinois Bell Telephone Co. v. FCC*, 883 F.2d 104, 112-113 (1990) (*citing Louisiana Public Service Commission v. FCC*, 476 US 355 (1986)).

Furthermore, the FCC also has “ancillary” jurisdiction under Section 4(i) of the Act, wherein the FCC is permitted to “perform any and all acts, make such rules and regulations, and issue such orders, not inconsistent with this chapter, as may be necessary in the execution of its functions.”³⁵ As stated in *American Library Association v. FCC*, in order for the FCC to invoke Section 4(i), it must demonstrate that:

(1) its general jurisdictional grant under Title I covers the subject of the regulations, and

(2) the regulations are reasonably ancillary to the Commission's effective performance of its statutorily mandated responsibilities.³⁶

The courts have found that the FCC’s use of its ancillary jurisdiction to promulgate rules is appropriate when it relies on “authority delegated to [it] by Congress,”³⁷ and that the rules are ancillary to its authority granted in “Title II, III or VI.”³⁸

In the case of video visitation services offered by the ICS providers, the FCC has the requisite authority to regulate the associated rates and ancillary fees under the authority delegated to the FCC in Section 201, 205 and 276. Specifically, as noted above, Section 201 affords the FCC the authority to find unlawful any “charge, practice, classification, or regulation that is unjust or unreasonable.”³⁹ Section 205 of the Act gives the FCC the authority to:

to determine and prescribe what will be the just and reasonable charge or the maximum or minimum, or maximum and minimum, charge or charges to be thereafter observed, and what classification, regulation, or practice is or will be just, fair, and reasonable, to be thereafter followed, and to make an order that the carrier or carriers shall cease and desist from such violation to the extent that the Commission finds that the same does or will exist.⁴⁰

Finally, Section 276(b)(1) grants to the FCC the specific authority to “take all actions necessary...to prescribe regulations that (A) establish a per call compensation plan to ensure

³⁵ 47 C.F.R. § 154(i).

³⁶ 406 F.3d 689, 692 (D.C. Cir 2005)(citing

³⁷ *Id.*, 406 F.3d at 691.

³⁸ *Comcast Corp. v. FCC*, 600 F.3d 642, 654 (2010).

³⁹ 47 USC 201(b).

⁴⁰ 47 USC 205(a).

that all payphone service providers are fairly compensated for each and every completed intrastate and interstate call using their payphone.”⁴¹ Section 276(c) grants to the FCC the authority to preempt “any State requirements [that] are inconsistent with the Commission’s regulations.”⁴² Congress defined “payphone service” to include “the provision of inmate telephone service in correctional institutions.”⁴³

Thus, Congress has delegated to the FCC expansive powers pursuant to Title II of the Communications Act to take steps to ensure that only just, reasonable and fair “charges and practices” are imposed on consumers of Inmate Calling Services. The FCC was given specific authority over both interstate and intrastate ICS in Section 276 of the Act, and was given the authority pursuant to Sections 201 and 205 of the Act to prescribe “just and reasonable charges” and to establish “just, fair and reasonable classifications, regulations and practices.” Moreover, to the extent that the FCC’s authority granted in Section 276 to “promote competition among [inmate telephone service] providers” is negated by intrastate concerns, the FCC is permitted to extend its authority over intrastate ICS as well.

Most important, the FCC may use its ancillary jurisdiction to adopt rules that address the charges, classifications, regulations and practices of video visitation service providers where such practices prevent the FCC from effectively performing its statutory duties. As noted above, ICS providers have taken steps to (i) bundle traditional ICS telephone service with video visitation; (2) remove ICS telephone service in favor of video visitation; and (3) charge ICS consumers rates and ancillary fees in excess of their costs.

Because the actions of ICS providers undermine the FCC’s statutory obligation to both (i) “promote the widespread deployment of [inmate] services to the benefit of the general public,”⁴⁴ and (ii) ensure that “just and reasonable” “charges, practices, classifications and regulations” are

⁴¹ 47 USC 276(b)(1).

⁴² 47 USC 276(c).

⁴³ 47 USC 276(d).

⁴⁴ 47 USC 276(b)(1).

implemented by ICS providers, the FCC may utilize its ancillary statutory authority to address this marketplace failure.⁴⁵

The Petitioners and other parties have provided substantial evidence that the FCC's statutory goals and obligations are being undermined by ICS providers, and the FCC has appropriately requested specific information from the ICS providers and correctional authorities so that it can determine whether further action with respect to ICS video visitation services is necessary. While it is likely that the ICS providers will argue that the FCC does not have jurisdiction to regulate those services,⁴⁶ those arguments should be rejected, and the FCC must take the appropriate steps to ensure that ICS customers do not experience unjust, unreasonable and unfair rates and ancillary fees.⁴⁷

Finally, the FCC should amend Section 64.6060(a) of its rules to require an additional certification with respect to video visitation. Specifically, the annual certification provided by the ICS providers must include the following:

64.6060(a)(8): Confirmation that the reporting Provider has not executed an agreement with a Correctional Facility, local, state, or federal governmental agency, or provided any inducement to the Correctional Facility, local, state, or federal governmental agency through the payment of Site Commissions or otherwise, that results in the reduction or elimination of in-person, face-to-face visitation at the Correctional Facility. In the event that the Provider cannot make this certification, the Provider shall submit a letter signed by the warden or confinement facility administrator indicating that any restrictions on in-person, face-to-face visitations cited in the agreement are the facility's request. To the extent that the Provider has previously executed an agreement that prevents it from making this certification, the Provider shall amend the agreement with 30 days to eliminate the offending provisions, or the Provider shall submit the required documentation from the warden or confinement facility administrator.

⁴⁵ Securus has supported the use of the FCC's ancillary authority to "ban an anticompetitive practice that distorts competition and leads to excessive rates for ICS." *See Lipman Ex Parte Submission*, April 8, 2015, pg. 6.

⁴⁶ *See, e.g., GTL Second FNPRM Comments*, pgs. 42-44.

⁴⁷ *See North American Telecommunications Association v. FCC*, 722 F.2d 1282, 1292 (7th. Cir. 1985) ("Section 4(i) empowers the Commission to deal with the unforeseen – even it that means straying a little way beyond the apparent boundaries of the Act – to the extent necessary to regulate effectively those matters already within its boundaries.")

The record demonstrates that certain ICS providers have required correctional facilities to eliminate live, face-to-face visitation in favor of video visitation so that the providers can charge for visitation. As discussed in more detail below, the FCC has the authority to review agreements pursuant to Section 211(b) to ensure that the FCC's rules and policies are not being undermined,⁴⁸ and additional authority under Section 201(b) to eliminate unjust and unreasonable practices. Therefore, the FCC must use the authority granted to it by Congress in light of substantial public interest in maintaining live, face-to-face visitation.

III. THE FCC SHOULD CONTINUE TO RECEIVE DATA FROM ICS PROVIDERS.

The first Mandatory Data Collection from the ICS providers provided a treasure trove of insight into the ICS industry. By reviewing the cost data, interested parties and the FCC were able to determine that the costs to provide ICS were substantially less than what had previously been disclosed through voluntary disclosures. Even though there were substantial inconsistencies in the way ICS providers reported their cost data,⁴⁹ the information that was provided directly led to the adoption of the ICS rate and ancillary fee caps in the *Second R&O*.

The *3rd FNPRM* requests comment on whether the FCC should adopt rules to make the mandatory data collection an annual requirement.⁵⁰ The Petitioners whole-heartedly support this proposal. As the FCC is well aware, there is substantial turn-over of ICS contracts, and ICS providers are aggressively pursuing new service agreements. The Petitioners support the *Second R&O* decision to require a mandatory data collection on the second anniversary of OMB approval of the data collection.⁵¹

However, in so far as the first Mandatory Data Collection occurred in August 2014, and reported data from 2012 and 2013, the Petitioners are concerned that the next data collection

⁴⁸ See *Southwestern Bell Telephone Co. v. FCC*, 19 F.3d 1475, 1483 (1990).

⁴⁹ See *Petitioners Ex Parte Submission*, Sept. 17, 2014 (providing analysis of cost data by Dr. Coleman Bazelon).

⁵⁰ *3rd FNPRM*, 30 FCC Rcd at 12,908.

⁵¹ *Second R&O*, 30 FCC Rcd at 12,862.

will not occur until 2nd or 3rd quarter 2018. By delaying the next mandatory collection until 2018, the FCC will not be in a position to analyze the impact of the *Second R&O* on a timely-basis, and will not be able to ensure that ICS consumers are being charged just, reasonable and fair ICS rates. This is especially true when, as noted above, the ICS providers are bundling their offerings to correctional authorities. Without timely, accurate cost data, the Petitioners are concerned that the FCC's efforts to date will be undermined.

Just as important as the timing of the next mandatory data collection is establishing a more comprehensive and uniform format to collect the data. As noted in the *Second R&O*⁵² and by the Petitioners,⁵³ ICS providers submitted inconsistent data in the first mandatory data collection.⁵⁴ In future mandatory data collections, the Petitioners urge the FCC to revise its *Inmate Calling Services Mandatory Data Collection Form and Instructions* to address the cited deficiencies. Moreover, the Petitioners strongly suggest that the FCC collect audited financial statements (Profit/Lost, Balance Sheets, Annual Audit Reports) so that the requested cost data can be considered properly in light of the ICS provider's revenue.

In sum, the Petitioners propose that the FCC (i) require a mandatory data collection no later than March 17, 2017 (one year after the effective date of the *Second R&O*), (ii) revise the Mandatory Data Collection Form and Instructions, and (iii) expand the collection to include granular revenue information. In light of the "suite" of services offered to correctional authorities, this data must not be restricted solely to that which is associated with the ICS

⁵² See *Second R&O*, Section IV(c) – "Evidence that the Mandatory Data Collection Likely Overstates Providers' Costs, 30 FCC Rcd at 12,798-12,801.

⁵³ See *Petitioners Second FNPRM Comments*, at Exhibit A. See also *Petitioners Ex Parte Submission*, Aug. 14, 2015.

⁵⁴ See *Second R&O*, 30 FCC Rcd at 12,800, nt. 223 (citing *Petitioners Second FNPRM Comments*, at Exhibit A - "Issues identified with the data submissions include: "Inconsistent and inaccurate allocation of costs between ICS and other services; Inconsistent categorization of costs into equipment, telecom, security, and other ancillary fees with limited or no justification or description; Incorrect calculation of financing charges; Inconsistent categorization of costs as direct or common; Inconsistent and inappropriate allocation of common costs with limited or no justification or description; Incorrect calculations for return on capital; and Incomplete description and justifications.").

provider's "traditional" ICS phone service, but must cover all aspects of the services delivered to a correctional facility to ensure that any cross-subsidization among the various services are properly taken into account.

IV. THE FCC MUST REQUIRE SUBMISSION OF ICS CONTRACTS.

This proceeding began with a simple proposition – the contracts between private prisons and ICS providers led to unjust and unreasonable ICS rates. Over the proceeding 12 years, the Petitioners and other organizations such as the HRDC, CURE and Prison Policy Initiative worked tirelessly to substantiate our arguments with evidence derived from the ICS contracts – evidence that ultimately led to the adoption of the comprehensive reform of ICS in the *Second R&O*.⁵⁵ With over 3,500 correctional authorities that have contracted for ICS, these efforts were time-consuming and costly.

In light of these concerns, the *3rd FNPRM* proposes to make the submission of ICS contracts to the FCC mandatory pursuant its authority set forth Section 211(b).⁵⁶ In particular, Section 211(b) gives the FCC the authority "to require the filing of any other contracts of any carrier."⁵⁷ The FCC has used this authority to monitor the behavior of carriers,⁵⁸ including the ability to "scrutinize a carrier's use of offerings by private contract [in order] to promote just, reasonable, and nondiscriminatory charges for common carrier services."⁵⁹ The obligation of filing contracts pursuant to Section 211(b) has been seen a critical method for the FCC to ensure that its Title II authority to regulate carriers is not undermined.⁶⁰

⁵⁵ See *3rd FNPRM*, 30 FCC Rcd 12,908–12,910.

⁵⁶ *Id.*, at 30 FCC Rcd 12,910.

⁵⁷ 47 USC § 211(b).

⁵⁸ See *Amendment of Sections 43.51 et al. of the Commission's Rules To Eliminate Certain Reporting Requirements*, Report and Order, 1 FCC Rcd 933, 934 (1986).

⁵⁹ See *Special Construction of Lines and Special Service Arrangements Provided by Common Carriers*, Notice of Proposed Rulemaking, 97 FCC 2d 978, ¶ 15 (1984).

⁶⁰ See *Southwestern Bell Telephone Co. v. FCC*, 19 F.3d 1475, 1483 (1990).

As one can imagine, the Petitioners strongly support the FCC's proposal to have new ICS contracts and recently signed amendments, submitted within 30 days of execution. The submission of these contracts and amendments into a ECFS docket would be the most efficient approach, and would aid efforts to monitor the ICS industry's compliance with the rules adopted in this proceeding. The FCC must take steps to ensure that ICS providers are not permitted to redact information that is not proprietary. In this context, proprietary should not include the services that are being offered, payments that are being made to the correctional authority (*i.e.*, site commissions, technology funds, contract management fees), or the rates that are being charged to the public. In the event that there is a dispute as to whether certain information is proprietary, the FCC should reserve the right to demand the submission of contracts under seal, and make a determination within an established period, *i.e.*, 30 days. Moreover, if there is evidence that ICS providers are not timely submitting ICS contracts and amendments, or routinely attempt to withhold non-proprietary information, the FCC should establish a process for referral to the Enforcement Bureau for further investigation.

Finally, the Petitioners urge the FCC to require each ICS provider to include the required information set forth in Section 64.6060 for Fiscal Year 2015 with their first Annual Reporting and Certification filed with the FCC. The FCC indicated that the first report will include only the previous year's information. In order to serve as a proper baseline to measure the call stimulation and other effects of the rules adopted in the *Second R&O* and as the result of the *3rd FNPM*, the FCC will need to review the data set forth in 64.6060 for the year prior to the implementation of the new rates and ancillary fees. Therefore, the first Annual Reporting and Certification filing should include the required information for both FY 2015 and FY 2016.

As noted above, these requirements are necessary because the ICS industry does not compete to serve ICS consumers. Instead, they compete to obtain exclusive control at a correctional facility in order to provide bundled ICS offerings to inmates and their families. ICS providers are directly analogous to dominant landline carriers of yesteryear. In light of their

monopoly control, the FCC must utilize its statutory authority to ensure just, reasonable and fair ICS rates and ancillary fees.

V. THE FCC MUST REGULATE INTERNATIONAL CALLING RATES.

The Petitioners agree with the FCC that it has the requisite authority to regulate the rates and fees charged for international ICS calls,⁶¹ and we share the FCC's frustration that ICS providers failed to "separate out costs for international calls from costs for the provision of interstate and intrastate calls,"⁶² despite clear instructions to do so.⁶³

The *3rd FNPRM* seeks confirmation that it has authority to regulate international ICS calls, and what rate caps should be adopted. Initially, there is no question that the FCC has the authority to regulate international ICS. Starting with Sections 152 and 201 of the Act,⁶⁴ through to the implementation of Telecommunications Act of 1996,⁶⁵ the FCC's authority to regulate international ICS to ensure just, reasonable and fair rates should not be controversial.

With the FCC's authority firmly in place, the Petitioners support the FCC's proposal to extend the rate and fee caps adopted in the *Second R&O* to international calls as well. The ICS

⁶¹ See *3rd FNPRM*, 30 FCC Rcd at 12,912.

⁶² *Id.*

⁶³ *Instructions for Inmate Calling Services Mandatory Data Collection*, at pg. 1 ("the Commission requires providers to include a list by state and call type (i.e., local, state intra-LATA, state inter-LATA, interstate, and international inmate calling services) of all ancillary charges or fees it charges to ICS consumers and account holders. ICS providers must also include the level, the costs, and the demand for each charge or fee, and indicate whether each charge or fee applies to jails or to prisons or to both.")

⁶⁴ 47 C.F.R. § 152 (granting FCC authority over "all interstate and foreign communication by wire or radio and all interstate and foreign transmission of energy by radio, which originates and/or is received within the United States, and to all persons engaged within the United States in such communication or such transmission of energy by radio, and to the licensing and regulating of all radio stations as hereinafter provided."). 47 C.F.R. § 201(a) (applying Title II regulation to "every common carrier engaged in interstate or foreign communication by wire or radio.").

⁶⁵ See *3rd FNPRM*, 30 FCC Rcd at 12,912 (citing *Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*, Report and Order, 11 FCC Rcd 20541, 20569, para. 54 (1996) (concluding that the Commission has authority under sections 4(i) and 201(b) of the Act to ensure that payphone service providers are fairly compensated for international as well as interstate and intrastate calls and finding "no evidence of congressional intent to leave these calls uncompensated under Section 276.").

providers have not supplied any information to justify that the cost to provide international ICS is higher than the costs to provide domestic ICS. Absent that information, which can only be provided by the ICS providers, the FCC must assume that the costs are the same.⁶⁶

Moreover, the Petitioners urge the FCC to adopt rules to require that international ICS is available in all correctional facilities. A significant number of immigrant detainees are being held in local and county jails, and not in detention facilities maintained by the U.S. Immigration and Customs Enforcement (ICE). Absent information from correctional authorities or ICE submitted in response to the *3rd FNPRM* justifying the adoption of different rules, rates and ancillary fees, the FCC should use its statutory authority to ensure that international ICS is subject to the same rate and ancillary fee caps.

VI. THIRD PARTY FINANCIAL TRANSACTION FEES

The *3rd FNPRM* correctly raises additional questions regarding the financial transactions directly associated with ICS calls and paid for by ICS consumers. The *Second R&O* addressed certain elements of these financial transactions, but more work is necessary to ensure that ICS consumers are not charged unjust, unreasonable and unfair fees in connection with their use of ICS.

It is noteworthy that the *3rd FNPRM* cites two ICS providers (CenturyLink and ICSolutions) who have gone on record urging the FCC to correct existing abuses associated with financial transaction fees, while Securus and GTL have defended these practices.⁶⁷ The Alabama PSC and Prison Policy Initiative have provided evidence of these revenue-sharing agreements.⁶⁸ This raises the significant question as to whether (and for how long) ICS consumers have been paying mark-up fees relating to revenue sharing agreements between ICS providers and third parties. It also indicates that the FCC must take an affirmative role in ensuring that ICS

⁶⁶ *Id.* (“a payphone performs similar functions, regardless of the destination of the call.”).

⁶⁷ *3rd FNPRM*, 30 FCC Rcd at 12,914-12,915.

⁶⁸ *Second R&O*, 30 FCC Rcd at 12,850, nt. 667.

customers are not charged unjust, unreasonable and unfair ancillary fees – either by the ICS provider, or because the ICS provider (who is not chosen by the ICS customer) has elected to maximize its revenue by entering into agreements with third parties that split up the proceeds earned from excessive fees charged to ICS customers.

The FCC most certainly has the authority to take these steps. As noted above, the FCC is vested with statutory authority to ensure that “[a]ll charges, practices, classifications, and regulations for and in connection with such communication service, shall be just and reasonable, and any such charge, practice, classification, or regulation that is unjust or unreasonable is declared to be unlawful.”⁶⁹ Moreover, as noted above, the FCC has the authority to confirm that ICS providers receive only “fair” compensation,⁷⁰ which means that it must be fair for both parties to the transaction.⁷¹ Finally, when necessary to ensure that its statutory authority and goals are not undermined, the FCC may use its ancillary authority under Section 4(i) of the Act.⁷² In the instant case, the FCC has clear evidence that ICS customers are being charged unjustly, unreasonably, and unfairly due to the pass-through of third-party transactions connected with revenue-sharing agreements over which the ICS consumer has no control.

ICS is fundamentally different than in other communication services regulated by the FCC. In other services, the FCC has stated that it would not regulate fees “when marketplace forces appear adequate to keep [the fees] at a reasonable level.”⁷³ Moreover, the FCC has noted

⁶⁹ 47 USC 201(b).

⁷⁰ 47 USC 276(b)(1)(A).

⁷¹ *Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*, Fifth Order on Reconsideration and Order on Remand, 17 FCC Rcd 21274, 21302-03, para. 82 (2002) (holding that “fair” compensation under section 276 “implies fairness to both sides”).

⁷² *See North American Telecommunications Association v. FCC*, 722 F.2d 1282, 1292 (7th Cir. 1985) (“Section 4(i) empowers the Commission to deal with the unforeseen – even if that means straying a little way beyond the apparent boundaries of the Act – to the extent necessary to regulate effectively those matters already within its boundaries.”)

⁷³ *In the Matter of Replacement of Part 90 by Part 88 to Revise the Private Land Mobile Radio Services and Modify the Policies Governing Them and Examination of Exclusivity and*

that, in the absence of competition, there is an incentive to charges fees when there is a likelihood that the provider will not “lose many customers.”⁷⁴ In the instant case, the ICS provider may lose a few ICS consumers because they may no longer be able to afford to receive calls from their loved ones, but the competitive fear that the ICS consumer will take its business elsewhere simply does not exist due to the complete lack of competition in the ICS marketplace.

Therefore, the Petitioners urge the FCC to invoke its statutory authority to prohibit the pass-through of ancillary fees that only serve to inflate the profits of ICS providers and their vendors. These ancillary fees have been shown to be the product of side-deals whereby the ICS consumers pay excessive fees, and then the ICS provider and the vendor divvy up the proceeds. If this sounds familiar, it should. ICS providers have similar side-deals with the correctional authorities – site commissions – which were shown to drive up the rates and ancillary fees charged to ICS consumers. The FCC has taken steps to reduce the impact of excessive ICS rates and ancillary fees, and the FCC must close the loop to eliminate the other approaches to gouge ICS consumers.

VII. COST/BENEFIT ANALYSIS OF PROPOSALS.

Finally, in response to the *3rd FNPRM*, the Petitioners incorporate the arguments presented in their previous submissions.⁷⁵ There is no doubt that increased contact between inmates and their loved ones reduces recidivist behavior by the inmate. There is no doubt that

Frequency Assignment Policies of the Private Land Mobile Services, Second Memorandum Opinion and Order, 14 FCC Rcd 8642, 8653 (Apr. 6, 1999).

⁷⁴ *In the Matter of Preserving the Open Internet*, Notice of Proposed Rulemaking, 24 FCC Rcd 13064, 13092-3 (Oct. 22, 2009) (“If content, application, and service providers were able to pass these fees on to users, then arguably competition might limit the fees by inducing users to switch from broadband Internet access service providers that charged a fee. As a practical matter, however, this appears unlikely in general, since for many applications, the content, application, and service providers do not charge users for access; and it is not clear that it would be practical for providers who do charge for their content, applications, and services, to pass these charges on to users and to explain the reason for this pass-through.”).

⁷⁵ *See e.g., Petitioners Comments*, filed March 25, 2013, pgs. 30-39. *See Petitioners Reply Comments*, filed April 22, 2013, pgs. 27-30. *See Petitioners Further NPRM Comments*, filed Dec. 20, 2013, pgs. 18-20.

increased contact between inmates and the 2.7 million children with at least one incarcerated parent benefits the child as well. The Petitioners have noted that even a small reduction in the recidivism rate would save communities hundreds of millions of dollars.⁷⁶ Additionally, the Petitioners have shown that excessive ICS rates and fees imposed on them by ICS providers have had enormous costs. Once the FCC received the ICS providers' costs, it learned to what extent ICS rates and ancillary fees were unjust, unreasonable and unfair.

Thus, while there may be costs associated with the adoption of the Petitioners' proposals contained herein, it should be clear that the steps taken by the FCC in the *First R&O* and *Second R&O* are incomplete. By addressing the issues discussed herein, the benefits associated with ICS consumers remaining in contact with their family and friends, along with the savings incurred by correctional agencies resulting from reduced recidivism costs, will offset any concern that ICS providers or correctional facilities may incur additional costs. In fact, as the FCC has acknowledged, lower rates and ancillary fees will increase ICS call volume, which may lead to any incurred costs being cancelled out by increase ICS revenue. Absent convincing proof to the contrary, any cost/benefit analysis must weigh in favor of ICS customers and the public interest.

CONCLUSION

The FCC has made tremendous progress in protecting ICS customers from unjust, unreasonable and unfair ICS rates and fees. As discussed above, by taking a limited number of additional steps, the FCC can satisfy the goals that guided the Petitioners – led by Ms. Martha Wright – to file the initial lawsuit in this matter. Martin Luther King, Jr. wrote that “justice too long delayed is justice denied.”⁷⁷ Through its efforts to remedy the remaining issues in the proceeding, the FCC can ensure that these lofty goals are met.

⁷⁶ See *Petitioners Comments*, filed March 25, 2013, pg. 36 (“if recidivism can be reduced by just 1%, the cost savings would be more than \$250 million per year, and a study by the Pew Center estimates that there would be a cost savings of \$653 million in one year if recidivism were to be reduced by 10%).

⁷⁷ See *Letter From a Birmingham Jail*, April 16, 1963.

Respectfully submitted,

By: 

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EXHIBIT A

VIDEO VISITATION QUESTIONS
3RD FNRPM - ¶¶ 298-307

FCC Question	Provider Supplied Information	Correctional Authority Supplied Information
We seek detailed information about the rates video visitation providers charge for these services.	X	X
Does the rate differ between prisons and jails?	X	X
Do video visitation providers bundle this service with traditional ICS or other services, and does that affect the rates users pay for video visitation?	X	X
We seek comment on how common conditions, such as eliminating in-person visits, are to offering video visitation services.	X	X
Does the practice of eliminating or reducing in-person visitation differ between jails and prisons? What are the consequences if such quotas are not met? How frequently are such conditions included in video visitation contracts? Are there other requirements like this that video visitation providers include in their contracts?	X	X
For the inmates and families that do use video visitation, how frequent is their use?	X	X
What is the comparative percentage between video visitation usage and traditional ICS usage?	X	X
Are inmates and their families more apt to use video visitation in jails or prisons, or is there no notable difference based on the type or size of facility?	X	X
The record indicates that some ICS providers offer tablet computers and kiosks that allow inmates to access games, music, educational tools, law library tools and commissary ordering.	X	X

FCC Question	Provider Supplied Information	Correctional Authority Supplied Information
What is the compensation mechanism for access to these offerings?		
What are ICS providers' rates for such services, including both service-specific rates and "all-you-can-eat" plans?	X	X
We also ask commenters to provide data on the minutes of use for video calls and whether and how these minutes of use have grown over the last few years.	X	X
How are these rates established?	X	X
How much, if at all, do the rates for video visitation fluctuate based on the type or size of the facility?	X	X
If there is a difference between charges for facility type or size, what are the reasons for the difference?	X	X
Are the rates for these services different from the rates for traditional ICS? If so, what is the justification for the difference?	X	X
If there are strictly video visitation providers who do not provide other forms of ICS, do their rates differ from those set by traditional ICS providers?	X	X
Does the end-user rate fluctuate by call volume or technology used?	X	X
Do providers pay site commissions on video calls?	X	X
If so, we ask commenters to file information on the magnitude of these payments.	X	X
"If commissions on phone services are restricted, providers could include with the phone services a video visitation system and, as an incentive to select them, offer to charge for on-site visits while offering a large commission on the consumer paid visitation services to compensate for commissions restricted on the inmate phone calling." Is this a practice that	X	X

FCC Question	Provider Supplied Information	Correctional Authority Supplied Information
occurs, or is likely to occur in some facilities offering video visitation?		
In facilities that offer both video visitation and traditional ICS, what percentage of inmates and their families utilize video visitation?	X	X
Finally, we seek comment on how prevalent VRS is in correctional institutions.	X	X
What is a typical rate charged for video visitation?	X	X
What cost savings do institutions experience, if any, by moving away from in-person visits?		X
To the extent that video visitation providers are charging rates that exceed our interim caps, have those providers been able to explain why their services are not a form of ICS that is not subject to those caps?	X	
Are the ancillary service charges for video visitation comparable to those of traditional ICS?	X	
Certain ICS providers that also provide video visitation charge different amounts for credit card transaction fees depending on the technology used by the inmate. Is this typical for ancillary fees and charges in general?	X	
We seek general comment on the costs to providers of video visitation.	X	
Are there additional costs to ICS providers in developing, provisioning, or offering video visitation services?	X	
Are there costs to the correctional facilities for provisioning video visitation services?	X	
Do ancillary service charges and site commissions affect video visitation rates? If so, how?	X	
What other kinds of advanced services are available to inmates?	X	
Are they available commonly in most	X	

FCC Question	Provider Supplied Information	Correctional Authority Supplied Information
facilities, or only in certain ones?		
What is the demand for these services and what rates and fees are charged?	X	
What are ICS providers' rates for other services such as email, voicemail or text messaging?	X	
What range of bandwidths and broadband speeds are currently provided or planned for video call systems?	X	
What bandwidth and broadband speed are the minimum necessary for effective video communications between ASL users?	X	
What types of video technology are currently used in video call systems?	X	
To what extent are video call systems interoperable with the video communications systems used by VRS providers? Should such interoperability be required?	X	

EXHIBIT B

**Securus Video Visitation
Facilities and Pricing**

State / Jail	Remote Friends and Family		Remote Attorney		Onsite Friends and Family		Onsite Attorney	
ALABAMA								
Elmore County Jail	20 mins. / \$7.99		20 mins. / \$7.99		20 mins. / \$0.00		20 mins. / \$0.00	
Russell County Sheriff's Office – Prentiss L Griffith Det. Ctr.	20 mins. / \$5.00 40 mins. / \$10.00		20 mins. / \$5.00 40 mins. / \$10.00		20 mins. / \$0.00		15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00	
ARIZONA								
Apache County Sheriff's Office	20 mins. / \$5.00		20 mins. / \$5.00		15 mins. / 0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00		15 mins. / 0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00	
Cochise County Jail	20 mins. / \$5.00 40 Mins. / \$10.00		20 mins. / \$5.00 40 Mins. / \$10.00		20 mins. / \$0.00		20 mins. / \$0.00	
Maricopa County	20 mins. / \$7.99		20 mins. / \$7.99		20 mins. / \$0.00 40 mins. / \$0.00		20 mins. / \$0.00 40 mins. / \$0.00	
CALIFORNIA								
Butte County Jail	20 mins. / \$7.99 40 Mins. / \$13.99		20 mins. / \$7.99 40 Mins. / \$13.99		20 mins. / \$0.00		20 mins. / \$0.00	
NAPA County	20 mins. / \$5.00 40 mins. / \$10.00 60 mins. / \$15.00		20 mins. / \$5.00 40 mins. / \$10.00 60 mins. / \$15.00		20 mins. / \$5.00		20 mins. / \$0.00	
San Diego County - Facility 8	30 mins. / \$5.00		30 mins. / \$5.00		30 mins. / \$0.00		30 mins. / \$0.00	
San Diego County - Las Colinas Detention & Reentry Facility	30 mins. / \$5.00		30 mins. / \$5.00		30 mins. / \$0.00		30 mins. / \$0.00	

State / Jail		Remote Friends and Family		Remote Attorney		Onsite Friends and Family		Onsite Attorney	
COLORADO									
Arapahoe County Detention Facility		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Chaffee County Jail		20 mins. / \$5.00 40 Mins. / \$10.00	15 mins. / \$0.00 30 mins. / \$0.00	20 mins. / \$0.00 40 mins. / \$0.00	20 mins. / \$0.00 40 mins. / \$0.00	20 mins. / \$0.00 40 mins. / \$0.00			
Jefferson County		30 mins. / \$8.99	20 mins. / \$0.00	20 mins. / \$0.00	30 mins. / \$0.00	30 mins. / \$0.00			
La Plata		25 mins. / \$5.00	25 mins. / \$0.00						
Moffat County		20 mins. / \$7.99	10 mins. / \$0.00	10 mins. / \$0.00	15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00	15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00			
Montezuma County Jail		20 mins. / \$5.00	20 mins. / \$0.00						
Montrose County Jail		20 mins. / \$5.00	10 mins. / \$0.00	10 mins. / \$0.00	15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00	15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00			
Pueblo County Detention Center		45 mins. / \$10.00	20 mins. / \$0.00						
Routt County Jail		20 mins. / \$12.99	10 mins. / \$0.00						
Summit County Jail		20 mins. / \$10.00 40 Mins. / \$20.00	20 mins. / \$0.00 40 Mins. / \$20.00	20 mins. / \$0.00 40 Mins. / \$20.00	20 mins. / \$0.00 40 mins. / \$0.00	20 mins. / \$0.00 40 mins. / \$0.00			
FLORIDA									
Collier County Jail - Naples		20 mins. / \$5.00	20 mins. / \$0.00						
Columbia County Detention Facility		30 mins. / \$9.95	30 mins. / \$0.00 60 mins. / \$0.00 90 mins. / \$0.00 120 mins. / \$0.00	30 mins. / \$0.00 60 mins. / \$0.00 90 mins. / \$0.00 120 mins. / \$0.00	30 mins. / \$0.00 60 mins. / \$0.00 90 mins. / \$0.00 120 mins. / \$0.00	30 mins. / \$0.00 60 mins. / \$0.00 90 mins. / \$0.00 120 mins. / \$0.00			
Marion County Jail		15 mins. / \$5.00 30 Mins. / \$10.00	15 mins. / \$0.00 30 Mins. / \$10.00	15 mins. / \$0.00 30 Mins. / \$10.00	15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00	15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00			
Okaloosa County Department Of		20 mins. / \$5.00	20 mins. / \$0.00						

State / Jail	Remote Friends and Family		Remote Attorney		Onsite Friends and Family		Onsite Attorney	
Correctional Services			40 Mins. / \$0.00				40 Mins. / \$0.00	
GEORGIA								
Barrow County Sherriff's Office	15 mins. / \$5.00		15 mins. / \$5.00		15 mins. / \$0.00		15 mins. / \$0.00	
Bibb County Jail	30 mins. / \$7.99		30 mins. / \$7.99		40 mins. / \$0.00		40 mins. / \$0.00	
Catoosa County Jail	20 mins. / \$7.99		20 mins. / \$7.99		20 mins. / \$0.00		20 mins. / \$0.00	
DeKalb County Sheriff's Office	30 mins. / \$5.00		30 mins. / \$5.00		30 mins. / \$0.00		30 mins. / \$0.00	
Fayette County Jail	20 mins. / \$7.99		20 mins. / \$7.99		20 mins. / \$0.00		20 mins. / \$0.00	
	40 Mins. / \$15.98		40 Mins. / \$15.98					
Fulton County Jail	30 mins. / \$5.00		30 mins. / \$5.00		30 mins. / \$0.00		30 mins. / \$0.00	
Gwinnett County Jail	30 mins. / \$5.00		30 mins. / \$5.00		20 mins. / \$0.00		20 mins. / \$0.00	
					40 Mins. / \$0.00		40 Mins. / \$0.00	
Rockdale County Sheriff's Office	N/A		N/A		N/A		N/A	
Tift County Law Enforcement Center	20 mins. / \$5.00		20 mins. / \$5.00		15 mins. / \$0.00		15 mins. / \$0.00	
					30 Mins. / \$0.00		30 mins. / \$0.00	
Troup County Sheriff's Office	20 mins. / \$7.99		20 mins. / \$7.99		20 mins. / \$0.00		20 mins. / \$0.00	
	40 Mins. / \$13.99		40 Mins. / \$13.99				45 mins. / \$0.00	
Walker County Sheriff's Department	20 mins. / \$5.00		20 mins. / \$5.00		20 mins. / \$0.00		20 mins. / \$0.00	
					40 Mins. / \$10.00			
ILLINOIS								
Adams County, IL	20 mins. / \$20.00		20 mins. / \$20.00		15 mins. / \$0.00		15 mins. / \$0.00	
	40 Mins. / \$40.00		40 Mins. / \$40.00				30 mins. / \$0.00	
Boone County Jail	20 mins. / \$5.00		20 mins. / \$5.00		15 mins. / \$0.00		15 mins. / \$0.00	
	40 Mins. / \$10.00		40 Mins. / \$10.00				45 mins. / \$0.00	
Henry County	20 mins. / \$20.00		20 mins. / \$20.00		20 mins. / \$0.00		20 mins. / \$0.00	
	40 Mins. / \$40.00		40 Mins. / \$40.00				60 mins. / \$0.00	

State / Jail	Remote Friends and Family		Remote Attorney		Onsite Friends and Family		Onsite Attorney	
Jackson County Sheriff's Office	30 mins. / \$7.99	30 mins. / \$7.99	30 mins. / \$7.99	30 mins. / \$0.00	30 mins. / \$0.00	30 mins. / \$0.00	30 mins. / \$0.00	30 mins. / \$0.00
Kankakee County Jail	20 mins. / \$20.00		20 mins. / \$20.00		15 mins. / \$0.00	15 mins. / \$0.00	15 mins. / \$0.00	
					30 mins. / \$0.00	30 mins. / \$0.00	30 mins. / \$0.00	
					45 mins. / \$0.00	45 mins. / \$0.00	45 mins. / \$0.00	
					60 mins. / \$0.00	60 mins. / \$0.00	60 mins. / \$0.00	
Kankakee County Jerome Combs Detention Center	20 mins. / \$20.00		20 mins. / \$20.00		15 mins. / \$0.00	15 mins. / \$0.00	15 mins. / \$0.00	
					30 mins. / \$0.00	30 mins. / \$0.00	30 mins. / \$0.00	
					45 mins. / \$0.00	45 mins. / \$0.00	45 mins. / \$0.00	
					60 mins. / \$0.00	60 mins. / \$0.00	60 mins. / \$0.00	
Knox County Jail	20 mins. / \$6.99	20 mins. / \$6.99	20 mins. / \$6.99	20 mins. / \$0.00	20 mins. / \$0.00	20 mins. / \$0.00	20 mins. / \$0.00	
Lake County Adult Correctional Facility	30 mins. / \$5.00	30 mins. / \$5.00	20 mins. / \$5.00		30 mins. / \$0.00	30 mins. / \$0.00	15 mins. / \$0.00	
Logan County Jail	20 mins. / \$0.00		20 mins. / \$11.95		15 mins. / \$0.00	15 mins. / \$0.00	15 mins. / \$0.00	
					30 mins. / \$0.00	30 mins. / \$0.00	30 mins. / \$0.00	
					45 mins. / \$0.00	45 mins. / \$0.00	45 mins. / \$0.00	
					60 mins. / \$0.00	60 mins. / \$0.00	60 mins. / \$0.00	
Perry County Jail	20 mins. / \$6.99	20 mins. / \$6.99	20 mins. / \$6.99	20 mins. / \$0.00	20 mins. / \$0.00	20 mins. / \$0.00	20 mins. / \$0.00	
St. Clair County Sheriff's Department	30 mins. / \$7.99	30 mins. / \$7.99	30 mins. / \$7.99	20 mins. / \$0.00	20 mins. / \$0.00	20 mins. / \$0.00	20 mins. / \$0.00	
Tazewell County Justice Center	20 mins. / \$20.00	20 mins. / \$20.00	20 mins. / \$20.00	20 mins. / \$0.00	25 mins. / \$0.00	25 mins. / \$0.00	25 mins. / \$0.00	
Whiteside County Jail	20 mins. / \$7.99	20 mins. / \$7.99	20 mins. / \$7.99	20 mins. / \$0.00	20 mins. / \$0.00	20 mins. / \$0.00	20 mins. / \$0.00	
	40 Mins. / \$13.99	40 Mins. / \$13.99	40 Mins. / \$13.99					
INDIANA								
Davess County Jail	20 mins. / \$5.00	20 mins. / \$5.00	20 mins. / \$20.00		25 mins. / \$0.00	25 mins. / \$0.00	15 mins. / \$0.00	
Elkhart County Correctional Complex	20 mins. / \$5.00						30 mins. / \$0.00	
							45 mins. / \$0.00	
							60 mins. / \$0.00	
							20 mins. / \$0.00	

State / Jail	Remote Friends and Family		Remote Attorney		Onsite Friends and Family		Onsite Attorney	
Floyd County Jail	40 Mins. / \$40.00	30 mins. / \$0.00	30 mins. / \$0.00	40 Mins. / \$0.00	30 mins. / \$0.00			
Gibson County Jail	20 mins. / \$5.00 40 Mins. / \$10.00	15 mins. / \$0.00 40 Mins. / \$10.00	15 mins. / \$0.00 40 Mins. / \$10.00	20 mins. / \$0.00 40 Mins. / \$0.00	20 mins. / \$0.00 40 Mins. / \$0.00			
Jefferson County Jail	20 mins. / \$5.00 40 Mins. / \$40.00	20 mins. / \$5.00 40 Mins. / \$40.00	20 mins. / \$5.00 40 Mins. / \$40.00	20 mins. / \$20.00 40 Mins. / \$40.00	15 mins. / \$0.00	15 mins. / \$0.00	20 mins. / \$0.00	40 Mins. / \$0.00
La Porte County Jail	20 mins. / \$7.99 40 Mins. / \$13.99	20 mins. / \$0.00	20 mins. / \$0.00	20 mins. / \$0.00	40 Mins. / \$0.00			
Montgomery County Sheriff's Office	20 mins. / \$5.00 40 Mins. / \$10.00	20 mins. / \$0.00	20 mins. / \$0.00	20 mins. / \$0.00	40 Mins. / \$0.00			
Porter County Sheriff's Department	20 mins. / \$7.99	20 mins. / \$0.00						
Pulaski County Jail	20 mins. / \$10.00 40 Mins. / \$20.00	15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00	15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00	15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00	15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00			
Vigo County Sheriff's Office	20 mins. / \$10.00 40 Mins. / \$20.00	20 mins. / \$10.00 40 Mins. / \$20.00	20 mins. / \$10.00 40 Mins. / \$20.00	20 mins. / \$10.00	20 mins. / \$0.00			
IOWA								
Pottawattamie County Jail	30 mins. / \$5.00	30 mins. / \$0.00	30 mins. / \$0.00	15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00	15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00			
Wapello County Jail	20 mins. / \$5.00 40 Mins. / \$10.00	20 mins. / \$0.00	20 mins. / \$0.00	15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00	15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00			
Woodbury County Jail	20 mins. / \$5.00	20 mins. / \$5.00	20 mins. / \$5.00	20 mins. / \$5.00 40 Mins. / \$10.00	25 mins. / \$0.00 50 Mins. / \$0.00	25 mins. / \$0.00 50 Mins. / \$0.00	15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00	15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00

State / Jail	Remote Friends and Family		Remote Attorney		Onsite Friends and Family		Onsite Attorney	
KANSAS								
Butler County Jail	20 mins. / \$5.00		20 mins. / \$5.00		20 mins. / \$0.00		20 mins. / \$0.00	
	40 Mins. / \$10.00		40 Mins. / \$10.00				40 mins. / \$0.00	
Ford County	20 mins. / \$5.00		20 mins. / \$5.00		20 mins. / \$0.00		20 mins. / \$0.00	
	40 Mins. / \$10.00		40 Mins. / \$10.00				40 mins. / \$0.00	
Saline County Jail	30 mins. / \$8.99		30 mins. / \$8.99		20 mins. / \$0.00		20 mins. / \$0.00	
	30 mins. / \$8.99		30 mins. / \$8.99		20 mins. / \$0.00		20 mins. / \$0.00	
Sedgwick County Detention Facility	30 mins. / \$10.00		30 mins. / \$10.00		20 mins. / \$0.00		20 mins. / \$0.00	
Shawnee County Adult Detention Center								
KENTUCKY								
Boyd County Detention Center	20 mins. / \$6.99		20 mins. / \$6.99		20 mins. / \$0.00		20 mins. / \$0.00	
	20 mins. / \$7.99		20 mins. / \$7.99		20 mins. / \$0.00		20 mins. / \$0.00	
Crittenden County Detention Center	40 Mins. / \$12.99		40 Mins. / \$12.99		25 mins. / \$0.00		25 mins. / \$0.00	
	20 mins. / \$5.00		20 mins. / \$5.00		25 mins. / \$0.00		25 mins. / \$0.00	
Pulaski County Detention Center	30 mins. / \$8.99		30 mins. / \$8.99		15 mins. / \$0.00		15 mins. / \$0.00	
	20 mins. / \$5.00		20 mins. / \$5.00		30 mins. / \$0.00		30 mins. / \$0.00	
Woodford County Detention Center	40 Mins. / \$10.00		40 Mins. / \$10.00		45 mins. / \$0.00		45 mins. / \$0.00	
					60 mins. / \$0.00		60 mins. / \$0.00	
LOUISIANA								
East Carroll Parish Female	30 mins. / \$5.00		30 mins. / \$5.00		20 mins. / \$0.00		20 mins. / \$0.00	
					40 mins. / \$0.00		40 mins. / \$0.00	
MAINE								
Somerset County Jail	20 mins. / \$5.00		20 mins. / \$5.00		20 mins. / \$0.00		20 mins. / \$0.00	
	40 mins. / \$10.00		40 mins. / \$10.00		40 mins. / \$0.00		40 mins. / \$0.00	

State / Jail		Remote Friends and Family		Remote Attorney		Onsite Friends and Family		Onsite Attorney	
MASSACHUSETTS									
BillERICA HOC (Middlesex)		N/A		Free for Attorneys		N/A		Free for Attorneys	
MICHIGAN									
Branch County Jail		20 mins. / \$5.00 40 mins. / \$10.00		20 mins. / \$5.00 40 mins. / \$10.00		20 mins. / \$0.00		20 mins. / \$0.00	
Genesee County Jail		20 mins. / \$10.99 40 mins. / \$17.99		20 mins. / \$10.99 40 mins. / \$17.99		20 mins. / \$5.00		20 mins. / \$5.00 40 mins. / \$10.00	
Ingham County Correctional Facility		25 mins. / \$5.00		25 mins. / \$5.00		25 mins. / \$0.00		15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00	
Isabella County Jail		20 mins. / \$5.00 40 mins. / \$10.00		20 mins. / \$5.00 40 mins. / \$20.00		20 mins. / \$0.00		20 mins. / \$0.00 40 mins. / \$0.00	
Midland County		25 mins. / \$5.00 50 mins. / \$10.00		25 mins. / \$5.00 50 mins. / \$10.00		25 mins. / \$0.00		25 mins. / \$0.00	
Newaygo County Jail		40 mins. / \$14.99		40 mins. / \$14.99		40 mins. / \$0.00		40 mins. / \$0.00	
Saginaw County Sheriff's Department		20 mins. / \$10.99 40 mins. / \$17.99		20 mins. / \$10.99 40 mins. / \$17.99		20 mins. / \$0.00		20 mins. / \$0.00	
Sanilac County Jail		25 mins. / \$5.00 50 mins. / \$10.00		20 mins. / \$5.00 40 mins. / \$10.00		25 mins. / \$0.00		25 mins. / \$0.00 50 mins. / \$0.00	
Van Buren County Sheriff's Office		20 mins. / \$5.00		20 mins. / \$5.00		20 mins. / \$0.00		20 mins. / \$0.00	
MINNESOTA									
Carver County Jail		20 mins. / \$5.00 40 mins. / \$10.00		20 mins. / \$5.00 40 mins. / \$10.00		15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00		15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00	
Goodhue Sheriff's Department		20 mins. / \$5.00		20 mins. / \$5.00		15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00		15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00	

State / Jail	Remote Friends and Family		Remote Attorney		Onsite Friends and Family		Onsite Attorney	
McLeod County Jail	20 mins. / \$4.00		20 mins. / \$4.00		60 mins. / \$0.00		60 mins. / \$0.00	
Ramsey County Adult Detention Center	20 mins. / \$7.99		20 mins. / \$7.99		15 mins. / \$0.00		15 mins. / \$0.00	
					30 mins. / \$0.00		30 mins. / \$0.00	
					45 mins. / \$0.00		45 mins. / \$0.00	
					60 mins. / \$0.00		60 mins. / \$0.00	
					20 mins. / \$0.00		20 mins. / \$0.00	
MISSISSIPPI								
Desoto County Sheriff's Department	20 mins. / \$5.00		20 mins. / \$5.00		20 mins. / \$0.00		20 mins. / \$0.00	
Jackson County Adult Detention Center	20 mins. / \$5.00		20 mins. / \$5.00		20 mins. / \$0.00		20 mins. / \$0.00	
MISSOURI								
Jefferson County Jail	25 mins. / \$8.99		25 mins. / \$8.99		25 mins. / \$0.00		25 mins. / \$0.00	
NEBRASKA								
Hall County Jail	20 mins. / \$5.00		20 mins. / \$5.00		55 mins. / \$0.00		15 mins. / \$0.00	
							30 mins. / \$0.00	
							45 mins. / \$0.00	
							60 mins. / \$0.00	
Saunders County	35 mins. / \$5.00		35 mins. / \$5.00		35 mins. / \$0.00		35 mins. / \$0.00	
NEVADA								
Lincoln County Jail	20 mins. / \$20.00		20 mins. / \$20.00		15 mins. / \$0.00		20 mins. / \$0.00	
NEW HAMPSHIRE								
Cheshire County DOC	20 mins. / \$5.00		20 mins. / \$5.00		20 mins. / \$0.00		20 mins. / \$0.00	
Coös County Department of Corrections	20 mins. / \$5.00		20 mins. / \$5.00		15 mins. / \$0.00		15 mins. / \$0.00	
	40 Mins. / \$10.00		40 Mins. / \$10.00		30 mins. / \$0.00		30 mins. / \$0.00	
					45 mins. / \$0.00		45 mins. / \$0.00	
					60 mins. / \$0.00		60 mins. / \$0.00	

State / Jail		Remote Friends and Family		Remote Attorney		Onsite Friends and Family		Onsite Attorney	
Rockingham County DOC		20 mins. / \$12.95 40 mins. / \$25.98		20 mins. / \$12.95		20 mins. / \$0.00		20 mins. / \$0.00	
NEW MEXICO									
Chaves County Adult Detention Center		20 mins. / \$5.00		20 mins. / \$10.00		20 mins. / \$0.00		20 mins. / \$0.00	
San Juan County Adult Detention Center		30 mins. / \$5.00		30 mins. / \$10.00		20 mins. / \$0.00		30 mins. / \$0.00	
NEW YORK									
Essex County Jail		30 mins. / \$5.00		15 mins. / \$5.00 30 mins. / \$5.00 45 mins. / \$45.00 60 mins. / \$60.00		15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00		15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00	
Livingston County Jail		15 mins. / \$5.00 60 mins. / \$40.00		15 mins. / \$10.00 45 mins. / \$45.00 60 mins. / \$60.00		15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00		15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00	
Niagara County Correctional Facility		N/A		N/A		N/A		N/A	
Ontario County Jail		30 mins. / \$5.00 60 mins. / \$10.00		15 mins. / \$5.00 30 mins. / \$5.00 45 mins. / \$10.00 60 mins. / \$10.00		15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00		15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00	
Westchester County Dept of Corrections		30 mins. / \$5.00 60 mins. / \$10.00		15 mins. / \$5.00 30 mins. / \$10.00 45 mins. / \$15.00 60 mins. / \$20.00		15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00		15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00	
NORTH CAROLINA									
Hoke County Detention Center		20 mins. / \$7.99 40 mins. / \$13.99		20 mins. / \$7.99 40 mins. / \$13.99		20 mins. / \$0.00 40 mins. / \$0.00		20 mins. / \$0.00 40 mins. / \$0.00	
Lincoln County Detention Center		20 mins. / \$20.00		20 mins. / \$20.00		15 mins. / \$0.00		20 mins. / \$0.00	

State / Jail	Remote Friends and Family		Remote Attorney		Onsite Friends and Family		Onsite Attorney	
OHIO								
Corrections Commission of Northwest Ohio	25 mins. / \$10.00	25 mins. / \$0.00						
Darke County Jail	20 mins. / \$20.00	20 mins. / \$0.00						
Licking County Justice Center	20 mins. / \$5.00 40 mins. / \$10.00	15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00	15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00	15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00	15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00			
Logan County Sheriff's Office	20 mins. / \$5.00	20 mins. / \$0.00						
Southeast Ohio Regional Jail	20 mins. / \$10.00 40 mins. / \$20.00	20 mins. / \$0.00 40 mins. / \$0.00						
OKLAHOMA								
Pittsburg County Jail	20 mins. / \$5.00 40 mins. / \$10.00	20 mins. / \$0.00						
Rogers County Jail	20 mins. / \$5.00	20 mins. / \$0.00						
OREGON								
Clatsop County Sheriff's Office	20 mins. / \$7.99	20 mins. / \$0.00						
Multnomah County Sheriff's Office	30 mins. / \$5.00	30 mins. / \$5.00	20 mins. / \$5.00	20 mins. / \$5.00	20 mins. / \$0.00			
PENNSYLVANIA								
Butler County Prison	20 mins. / \$5.00 40 mins. / \$10.00	15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00	15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00	15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00	15 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00 60 mins. / \$0.00			
Monroe County Correctional Facility	20 mins. / \$20.00 40 mins. / \$40.00	N/A	N/A	N/A	N/A			
SOUTH CAROLINA								
Aiken County Detention Center	20 mins. / \$5.00	30 mins. / \$0.00	30 mins. / \$0.00	20 mins. / \$0.00	20 mins. / \$0.00			

State / Jail	Remote Friends and Family		Remote Attorney		Onsite Friends and Family		Onsite Attorney	
	40 mins. / \$10.00		40 mins. / \$10.00		20 mins. / \$0.00		40 mins. / \$0.00	
Chesterfield County Detention Center	20 mins. / \$5.00		20 mins. / \$5.00		20 mins. / \$0.00		20 mins. / \$0.00	
	40 mins. / \$10.00		40 mins. / \$10.00		20 mins. / \$0.00		40 mins. / \$0.00	
Darlington County	20 mins. / \$7.99		20 mins. / \$7.99		20 mins. / \$0.00		20 mins. / \$0.00	
	40 mins. / \$13.99		40 mins. / \$13.99		40 mins. / \$0.00		40 mins. / \$0.00	
Lexington County Jail	35 mins. / \$10.00		35 mins. / \$10.00		20 mins. / \$0.00		15 mins. / \$0.00	
							30 mins. / \$0.00	
							45 mins. / \$0.00	
							60 mins. / \$0.00	
TENNESSEE								
Bradley County Justice Complex	30 mins. / \$8.99		30 mins. / \$8.99		30 mins. / \$0.00		30 mins. / \$0.00	
Carroll County Jail	20 mins. / \$20.00		20 mins. / \$20.00		60 mins. / \$0.00		60 mins. / \$0.00	
DeKalb County Jail	20 mins. / \$10.00		20 mins. / \$10.00		20 mins. / \$0.00		20 mins. / \$0.00	
	40 mins. / \$20.00		40 mins. / \$20.00		40 mins. / \$0.00		40 mins. / \$0.00	
Greene County Detention Center	20 mins. / \$5.00		20 mins. / \$5.00		20 mins. / \$0.00		20 mins. / \$0.00	
	40 mins. / \$10.00		40 mins. / \$10.00		40 mins. / \$0.00		40 mins. / \$0.00	
Hamilton County Jail	30 mins. / \$5.00		30 mins. / \$5.00		30 mins. / \$0.00		30 mins. / \$0.00	
Jefferson County	20 mins. / \$12.99		20 mins. / \$12.99		60 mins. / \$0.00		60 mins. / \$0.00	
	40 mins. / \$24.99		40 mins. / \$24.99					
Scott County Jail Bldg 2	30 mins. / \$7.99		30 mins. / \$7.99		20 mins. / \$0.00		20 mins. / \$0.00	
Sullivan Correctional Facility	N/A		N/A		40 mins. / \$0.00		40 mins. / \$0.00	
					N/A		N/A	
TEXAS								
Bastrop County Jail	20 mins. / \$20.00		20 mins. / \$20.00		20 mins. / \$0.00		20 mins. / \$0.00	
Dallas County George Allen Jail	20 mins. / \$5.00		20 mins. / \$5.00		20 mins. / \$0.00		20 mins. / \$0.00	
Dallas County Lew Sterrett North Tower	20 mins. / \$5.00		20 mins. / \$5.00		20 mins. / \$0.00		20 mins. / \$0.00	
Dallas County Lew Sterrett West Tower	20 mins. / \$5.00		20 mins. / \$5.00		20 mins. / \$0.00		20 mins. / \$0.00	

State / Jail	Remote Friends and Family		Onsite Friends and Family		Onsite Attorney
	Family	Remote Attorney	Family	Remote Attorney	
Dallas County Suzanne Kays Detention Center	20 mins. / \$5.00	20 mins. / \$5.00	20 mins. / \$0.00	20 mins. / \$0.00	20 mins. / \$0.00
Denton County Sheriff's Office	20 mins. / \$8.99	20 mins. / \$8.99	20 mins. / \$0.00	20 mins. / \$0.00	20 mins. / \$0.00
Harris County	20 mins. / \$0.00 40 mins. / \$0.00	20 mins. / \$0.00 40 mins. / \$0.00	20 mins. / \$0.00 40 mins. / \$0.00	20 mins. / \$0.00 40 mins. / \$0.00	20 mins. / \$0.00 40 mins. / \$0.00
Hays County Law Enforcement Center	25 mins. / \$7.99	25 mins. / \$7.99	25 mins. / \$0.00	25 mins. / \$0.00	25 mins. / \$0.00
Hopkins County Jail	20 mins. / \$5.00 40 mins. / \$10.00	20 mins. / \$5.00 40 mins. / \$10.00	25 mins. / \$0.00	25 mins. / \$0.00	20 mins. / \$0.00 40 mins. / \$0.00
Travis County Correctional Complex	25 mins. / \$10.00	25 mins. / \$0.00	25 mins. / \$0.00	25 mins. / \$0.00	25 mins. / \$0.00
Wilson County Jail	20 mins. / \$5.00	20 mins. / \$5.00	20 mins. / \$0.00	20 mins. / \$0.00	20 mins. / \$0.00
Wood County Sheriff Department	20 mins. / \$12.99	20 mins. / \$10.00	20 mins. / \$0.00	20 mins. / \$0.00	20 mins. / \$0.00
UTAH					
Beaver County Sheriff's Office	20 mins. / \$5.00	20 mins. / \$5.00	20 mins. / \$0.00	20 mins. / \$0.00	20 mins. / \$0.00
Davis County Jail	40 mins. / \$7.99	30 mins. / \$7.99	20 mins. / \$0.00	20 mins. / \$0.00	20 mins. / \$0.00
Iron County Jail	20 mins. / \$5.00 40 mins. / \$10.00	20 mins. / \$5.00 40 mins. / \$10.00	20 mins. / \$0.00 40 mins. / \$0.00	20 mins. / \$0.00 40 mins. / \$0.00	20 mins. / \$0.00 40 mins. / \$0.00
San Juan County Jail	30 mins. / \$5.00	30 mins. / \$5.00	30 mins. / \$0.00	30 mins. / \$0.00	30 mins. / \$0.00
Utah County Annex Jail	N/A	N/A	N/A	N/A	N/A
Utah County Jail	25 mins. / \$5.00	25 mins. / \$5.00	25 mins. / \$0.00	25 mins. / \$0.00	25 mins. / \$0.00
VIRGINIA					
Hampton Roads Regional Jail	20 mins. / \$5.00 40 mins. / \$5.00	20 mins. / \$5.00 40 mins. / \$5.00	20 mins. / \$0.00 40 mins. / \$0.00	20 mins. / \$0.00 40 mins. / \$0.00	20 mins. / \$0.00 40 mins. / \$0.00
Newport News Attorney	N/A	20 mins. / \$7.99	20 mins. / \$0.00	20 mins. / \$0.00	45 mins. / \$0.00
Newport News City Jail	20 mins. / \$7.99	N/A	20 mins. / \$0.00	20 mins. / \$0.00	20 mins. / \$0.00
Newport News City Jail Annex	20 mins. / \$5.00	20 mins. / \$5.00	20 mins. / \$0.00	20 mins. / \$0.00	20 mins. / \$0.00
Northern Neck Attorney	20 mins. / \$5.00	20 mins. / \$0.00 30 mins. / \$0.00 45 mins. / \$0.00	20 mins. / \$0.00	20 mins. / \$0.00	20 mins. / \$0.00



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Video	Fee
30 Min	\$9.95

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Video	Fee
30 Min	\$9.95

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30 Min	\$9.95



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State / Jail	Remote Friends and Family
Anoka County Sheriff's Office, MN	20 mins. / \$10.00
Ashland County Sheriff's Office, WI	20 mins. / \$10.00
Boulder County Jail, CO	30 mins. / \$9.00
Butler County Detention Center, MO	15 mins. / \$7.50
Camden County Adult Detention Center, MO	15 mins. / \$7.50
Carroll County Jail, MD	N/A
Champaign County Sheriff's Office, IL	20 mins. / \$10.00
Chesapeake Correctional Center, VA	30 mins. / \$15.00
Christian County Jail, MO	? mins. / \$20.00
Dane County Sheriff's Office, WI	N/A
Fayette County Jail, IL	15 mins. / \$
Graham County Sheriff's Office, AZ	30 mins. / \$20.00
Howard County Jail, MD	30 mins. / \$
Kane County Sheriff's Office, IL	N/A
Kings County, CA	30 mins. / \$
LaCledde County Sheriff's Office, MN	30 mins. / \$
Lamar County Jail, MS	30 mins. / \$
Larimer County Jail, CO	_ mins. / \$15.00
Livingston County Sheriff's Office, MI	20 mins. / \$
Macomb County Jail, MI	30 mins. / \$15.00
Marion County Jail, MO	20 mins. / \$10.00
Minnehaha County Jail, SD	30 mins. / \$10.50
Navajo County Jail, AZ	30 mins. / \$15.00
Onondaga Dept of Correction, NY	30 mins. / \$10.50
Osceola County Jail, FL	30 mins. / \$15.00
Pemiscot County Sheriff's Office, MO	20 mins. / \$10.00
Placer County Sheriff's Office, CA	30 mins. / \$15.00
Rogers County Jail, OK	20 mins. / \$10.00
Scotts Bluff County Detention Center, NE	30 mins. / \$15.00
Southwest Virginia Regional Jail Authority, VA	15 mins. / \$7.50
Summit County Jail, OH	25 mins. / \$12.50
Walworth County Jail, WI	30 mins. / \$

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State / Jail	Remote Friends and Family
ARIZONA	
Yavapai County Jail	N/A
CALIFORNIA	
Los Angeles County, CA	N/A
Naval Consolidated Brig Miramar, CA	25 mins. / \$12.50
City and County of San Francisco, CA	N/A
COLORADO	
Clear Creek County, CO	N/A
DISTRICT OF COLUMBIA	
Washington DC Dept of Corrections	N/A
FLORIDA	
Alachua County, FL	20 mins. / \$8.00
Escambia County, FL	N/A
Levy County, FL	N/A
Manatee County, FL	N/A
Orange County, FL	N/A
Palm Beach County, FL	N/A
Sarasota County, FL	N/A
St. Lucie County, FL	N/A
ILLINOIS	
Peoria County, IL	N/A
INDIANA	
Morgan County, IN	N/A
KENTUCKY	
Campbell County, KY	N/A
Pike County, KY	15 mins. / \$10.00
MAINE	
TWO BRIDGES REGIONAL JAIL, ME	25 mins. / \$10.00

State / Jail	Remote Friends and Family
MARYLAND	
Washington County, MD	N/A
MICHIGAN	
Kent County, MI	10 mins. / \$4.00 25 mins. / \$10.00 Additional On-Site Visits / \$15.00
MINNESOTA	
Douglas County, MN	N/A
Houston County, MN	N/A
Nobles County, MN	N/A
Ramsey County, MN	N/A
NEBRASKA	
Lancaster County, NE	N/A
Lincoln County, NE	N/A
NEVADA	
Clark County, NV	N/A
NEW JERSEY	
Ocean County, NJ	N/A
Passaic County, NJ	N/A
NEW YORK	
Orange County, NY	N/A
NORTH CAROLINA	
Buncombe County, NC	10 mins. / \$6.50 25 mins. / \$16.25 Extra On-Site Visits / \$9.75
Cabarrus County, NC	N/A
Davidson County, NC	25 mins. / \$20.00
Moore County, NC	20 mins. / \$10.00
UTAH	
Weber County, UT	25 mins. / \$20.00

State / Jail	Remote Friends and Family
VIRGINIA	
Meherrin River Regional Jail, VA	15 mins. / \$6.00 30 mins. / \$12.00
Riverside Regional Jail, VA	N/A
Rappahannock Regional Jail, VA	N/A
Virginia Beach, VA	N/A
WISCONSIN	
Eau Claire County, WI	10 mins. / \$5.00 25 mins. / \$12.50
La Crosse County, WI	N/A
Milwaukee County, WI	N/A