



January 19, 2015

By Electronic Filing

Comment

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
WASHINGTON, D.C. 20554

Re: WC DOCKET NO. 12-375 - Comment

Dear Ms. Dortch:

Secured Perimeters International welcomes the opportunity to provide comment on the recent Third Further Notice of Proposed Rulemaking as it relates to promoting completion for Inmate Calling Services (ICS), video visitation, rates for international calls, data reporting mandates and other areas of concern in the ICS industry. We are pleased that the FCC continues to provide the public forum for comments and are in agreement with the steps that the FCC and Commissioners have ruled thus far.

We believe it will please the Commission members as well as many of the Communities served to know, that very soon, products will be available:

1. The Wright Choice TM – Automated Auditor: Interprets ICS call/communications data into logical report formats, i.e. ., raw call detail records, to benefit each Facility in understanding their gross call volumes, taxes and surcharges from their ICS provider, video provider or any other communications provider. It will also provide communications data reconciliation reports which can be used by any ICS, Video, or Communications Providers as a sanity check to their revenue, tax, tariff reports, LATA tables, etc. It too will provide governing bodies such as the FCC, State Public Service Commissions, USAC, and State Revenue Departments with secure access of data as a comparison to ICS mandated facility reports.
2. The Wright Choice TM offers each Facility a managed calling/communication solution which incorporates multiple Call Vendor Choices to the Inmate for communications products such as video as well as standard inmate calling, and other communication/educational products. Inmates will choose and quickly ascertain which Call Vendor's rate & service most benefits their calling/communication needs, rather than a single contracted ICS Provider. This process will not require multiple RFPs or ITBs from different ICS Providers and it will not add additional procurement burdens or staff requirements to municipalities. The Wright Choice TM – Automated Auditor, as described in option 1, is included and will streamline procedures for approved facility/municipality staff. This solution will also provide automated reconciliation. Reporting capabilities will incorporate rates, taxes, fees, call types, communication types, USAC, etc., and will quickly identify errors.



For the family members or called parties there will be a learning curve to the aforementioned. However, detainees learn quickly and so do their loved ones. We plan to work with interested organizations to explain these upcoming communication choices in an attempt to be proactive and educate everyone on their new options.

The call data belongs to the facility/municipality. For the facility/municipality, both these options will be very beneficial and seamless to deploy and improve their ability to interpret future needs of their inmate community, monitoring officers and cost of ICS operations.

We, at Secured Perimeters, and our partners, are working diligently to complete testing of these models to provide all the benefits as foreseen by this Commission. Keep up the good work!

Respectfully submitted,

Secured Perimeters International

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