



February 8, 2016

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 once again welcomes the opportunity to provide additional comments on the recent Third Further Notice of Proposed Rulemaking as it relates to promoting completion for Inmate Calling Services (ICS), video visitation, data reporting mandates and other areas of concern in the ICS industry. Our biggest issue in the comments we have seen is in relation to the confusion which appears to exist concerning regulation vs deregulation of video visitation, along with other technologies which have shown emergence in the industry. These include kiosks, tablets and other handheld or wall mounted SIP/VoIP devices. We are pleased that the FCC continues to stand strong, in the wake of opposition to the principles on which the Wright Petition began.

If successful, the Wright Petition will help create a level playing field for all vendors, will help reduce recidivism by offering multiple communication methodologies, and will allow all of the technology currently available without compromising the security of the inmates or the facilities, despite what many have been told. All of this can be done at a fair and reasonable price without gouging the public or the facilities, and the Vendors will continue to make a reasonable profit, *if the FCC regulates these items*. **Fear should not be with regulation; it should be with deregulation.**

Secured Perimeters International agrees with the National Sheriff's Association that the FCC should not prohibit exclusive contracts with ITS Providers. We also agree that the NSA should be allowed to take 6 months to learn more about new technology such as Video Visitation, Kiosks, and the many different revenue generating modules. However, we feel that it is imperative for the Sheriff's Offices to gain a better understanding of the traditional inmate telephone systems' call data records (CDRs) and revenue reconciliation processes in the regulated ITS environment. *The unedited charges for records of all electronic communications originated by an inmate, or received by an inmate, should be available to the correctional facilities from the ITS or Communication Providers.*

It is apparent from reading some of the comments, that there are ITS and/or Communication Providers who continue to use scare tactics when discussing this order and new technology with the Sheriff's Departments and Associations. Some of these same ITS Providers continue to fight to get commission abolished and there are those who do not even provide sufficient reconciliation data for their traditional inmate telephone systems. These comments are not intended to be negative towards the Sheriffs or Associations. Our intent is to help point out revenue reconciliation problems regarding the existing technology, which has been installed for more than two decades, before attempting to learn about new technology from some of the same companies that have been involved in fee gouging, and were the perpetrators that required the need for The Wright Petition in the first place.



Secured Perimeters International looks forward to communications with the various Sheriff Departments, Sheriff's Associations, applicable Public Service Commissions, the FCC, and any other interested companies.

Inmate Telecom Regulated versus Deregulated

FCC Docket 12-375 is necessary. It is being implemented and challenged during another telecom or communications transitional period. Technology is liquid and forever changing. This is especially true in the communications and computing industries which includes corrections.

The wording in the traditional telecom industry can be confusing and is no longer applicable to most of the inmate telephone contracts. It is more important than ever for facilities to understand the language used and the revenue generating modules implemented in the new communication contracts, including telephone, kiosks, video visitation or anything which could be attached to an inmate or loved one's prepaid money. What regulation really means is protection for the items above.

It may appear that many correctional facilities are only using traditional inmate telephones. However, in the past several years, capital expense for VoIP/SIP technology has already been paid for, and the infrastructure is currently installed at most of the correctional facilities. This technology has been subtly intertwined with most of the traditional POTS lines (analog phones) which now work with digital equipment for most ITS Providers at the different Facilities. The newly evolved communications protocol (centralized platform) is cheaper, easier to administer, brings more free security features, etc. The advantages are too many to mention. The return on investment for equipment and man hours during this transitional period should have been realized within the first year, due to the savings in traditional telecom analog pricing for most of the ITS Providers. You might be thinking by now, what does all of this have to do with Regulated versus Deregulated?

The technology has also introduced new communication products to correctional facilities that are most helpful with Investigations. Remote visitation is a growing trend for a lot of Facilities and Visitors. Inmate Email and Messaging modules are now competing with traditional inmate phone calls. Inmate families sharing pictures with Inmates and leaving Voice Mail are just a normal part of many of today's correctional facilities.

The transition for ITS Providers from analog to digital was rapid, due to the cost savings associated with digital broadband, VoIP, SIP, etc.

Regulated Inmate Telecom:

In an attempt to explain what *Regulated Inmate Telecom* is, without drawing a picture, it occurs anytime a phone call leaves a correctional facility from a traditional inmate telephone that hangs on the wall (analog) and is actually connected to a called party, who accepts the call through their home telephone (analog-home phone, PSTN), and pays monthly service fees to a traditional phone company; i.e. AT&T, Century Link, etc. *A Collect Call would be an example.*



Deregulated Inmate Telecom:

For Deregulated Inmate Telecom, replace the traditional inmate telephone with a Video Visitation Unit, a Tablet, a Kiosk or a Handheld Device or a retrofitted traditional Inmate Telephone Set that hangs on the wall with an Ethernet Connector, and the called party can either be on their traditional house phone, a SIP phone, a tablet, a laptop or any variation of a cellular phone. The bottom line is, almost all of today's household communication devices would be considered deregulated, because they do not have to physically connect to a wired line (traditional phone company/analog/PSTN).

The Regulatory Authorities are not disputing the need or transition for newer technology in corrections. They are trying to safeguard the citizens from fee gouging and protect the correctional facilities, by requiring sufficient revenue reconciliation reporting efforts from the Providers for new revenue generating modules.

Additionally, the FCC is not attempting to ban exclusive Inmate Calling Services (ICS) contracts. They are seeking Comments to find out if there is additional technology which will provide a Multiple Provider Solution without compromising security or investigative items at a Facility level. They are also working to ensure that new revenue generating technology is correctly identified and reconcilable in facility contracts.

Secured Perimeters International wishes to thank Lee Petro on behalf of the Wright Petitioners, the AL PSC, and the FCC for their diligence in ensuring that there will finally be justice for Martha Wright et al. We applaud the ICS companies who have not participated in the fee games of the past and have and will continue to provide secure telecom services and technology without compromising ethics.

Respectfully submitted,

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AL Sheriff's Association
National Sheriff's Association
AL Commissioner's Association
FL Public Service Commission
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