

**ROWAN COUNTY DETENTION CENTER**

Received & Inspected

AUG 25 2009  
FCC Mail Room

**Donald K. Hall, Jailer**  
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Morehead, KY 40351  
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August 19, 2009

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

RE: WC Docket No. 09-144, In the Matter of Securus Petition for Declaratory Ruling

Dear Ms. Dortch:

As a correctional officer in charge of operating a secure jail, I would like to submit this letter in support of the Securus Petition for Declaratory Ruling.

Companies that take calls away from our jail and route them to unknown destinations, which Securus calls "call diversion," are a real security threat. These schemes can endanger lives. Rowan County cannot allow this activity to go on, and as I understand it, the only way to ensure that calls are not stolen this way is to block calls from being dialed to the local numbers that are being used in these schemes.

As I understand it, blocking inmate calls to those local numbers is no different than blocking access to 1-800-COLLECT. Any service provider that allows an inmate to get outside the security features of inmate phones presents a danger to public safety, and we have always requested that inmates be barred from using such services. Call diversion is just another form of circumventing the system.

Actually, call diversion is much worse. These companies operate "underground" – they do not bid on contracts, they do not announce themselves to us as a service provider, and the local numbers they give out are not requested. I do not understand why companies like this are permitted to provide phone service.

The Securus Petition should be granted so that I, and other correctional authorities, can get back control over the calls that inmates place. We have to know where inmate calls

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are going and prevent inmates from calling protected persons. Schemes that try to mask call destinations must therefore be stopped. Please allow Securus and the other inmate phone providers to prevent these fraudulent schemes and to continue to provide the safe and secure service that we need.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Donald K. Hall". The signature is written in a cursive style with a large, prominent initial "D".

Donald K. Hall  
Rowan County Jailer