

Psalms 127:1
Except the Lord build the
house, they labor in vain that
build it.

C C I

Eshesians 4:28
let him who steal no
longer, but rather let him
labor...

B A C

January 27, 2012

VIA ECFS

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

Re: *Securus Petition for Declaratory Ruling, WC Docket No. 09-144*

Dear Marlene H. Dortch:

Corrections Concepts, Inc. (CCI) is a non-profit, faith-based, 501(c)(3) organization dedicated to turning offenders into citizens, restoring and reuniting families, and initiating a plan of successful, continuing habilitation and reintegration. CCI's Board is composed of former wardens, administrators, educators, vocational training specialists, personnel managers and ministers. Over the past twenty years, we have developed a program for the comprehensive treatment of inmates that shortly will culminate with the establishment of four, six-hundred bed corrections facilities for adult males, adult females, juveniles, and geriatric males. To advance our initiative, CCI has entered into agreements with the Wakita Economic Development Authority, the Town of Wakita, work-program providers, and other entities to build and operate these facilities. At this point in time, we have completed construction and engineering drawings, and obtained financing, and we are now assembling staff and finalizing inmate contracts.¹

A vital ingredient in our effort to habilitate and reintegrate offenders is the ability to keep families and friends in touch with inmates. We believe that ongoing dialogue between inmates and their outside lives is crucial to restoring and reuniting families, and to providing inmates with the familial support they need for a successful return to society. However, inmates and their families are often subjected to egregiously high per-minute phone rates, which hinder their ability to maintain contact. Therefore, we join Millicorp in urging the Federal Communications Commission (FCC) to deny the Securus Petition for Declaratory Ruling in the above-referenced proceeding. If the Securus petition were granted, Securus and other inmate telephone service providers could continue to prevent the friends and family of inmates from using modern technology to reduce the costs of staying in touch with their jailed loved ones. Such a result would impair efforts to habilitate and reintegrate offenders.

Impressed with Millicorp's ability to aid communication between inmates and their friends and family, we have partnered with Millicorp. By providing the families and friends of inmates with a local number, friends and families of inmates can avoid

¹ Further details are available at www.correctionsconcepts.org.

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expensive, and sometimes cost-prohibitive, long-distance rates, thereby mending and expanding relationships with the inmates. In addition, we found Millicorp's plan to introduce video-conferencing to the corrections facilities that we are developing to be innovative, cost-effective, and another useful habilitation tool. We are glad to have found a partner that can provide the cost-saving services and technology we believe necessary to maintain the relationships between inmates and their families and thus help to successfully reintegrate the inmates into society.

In contrast, we were disenchanted by meetings with Securus. CCI had an agreement with Evercom to provide telephone services to our planned facilities. After Securus acquired Evercom, we met with Securus senior staff to discuss renewing our agreement. We found Securus to be solely profit-driven and uninterested in, and unmotivated by, increasing the ease and affordability of communication between inmates and their families. Antithetical to our beliefs and efforts and divergent from our observations of Millicorp, Securus seemed to have no regard for family restoration and reunification.

In sum, we urge the FCC to deny the Securus petition and thereby facilitate cost-effective services that enable the restoration and reunification of families. Thank you for your consideration and please do not hesitate to contact me with any questions you may have regarding this matter.

Respectfully,

/s/ Bill Robinson

Bill Robinson
Chairman and Founder
CORRECTIONS CONCEPTS, INC (CCI)