

vital it is that we use them as part of our support system but, in the majority of cases, this is not possible due to the lack of funds.

I, personally, do not have a bond with my family any longer. Throughout time and very minimal contact with my family our bond, that we once shared deteriorated, they will not be there when I am released.

I am not writing this letter on behalf of myself because even if phone call prices were lowered to one dollar today, I have no one to call.

I am, however, writing this letter on behalf of the countless of other inmates that still have the chance to maintain and save the bond with their families, friends and loved ones.

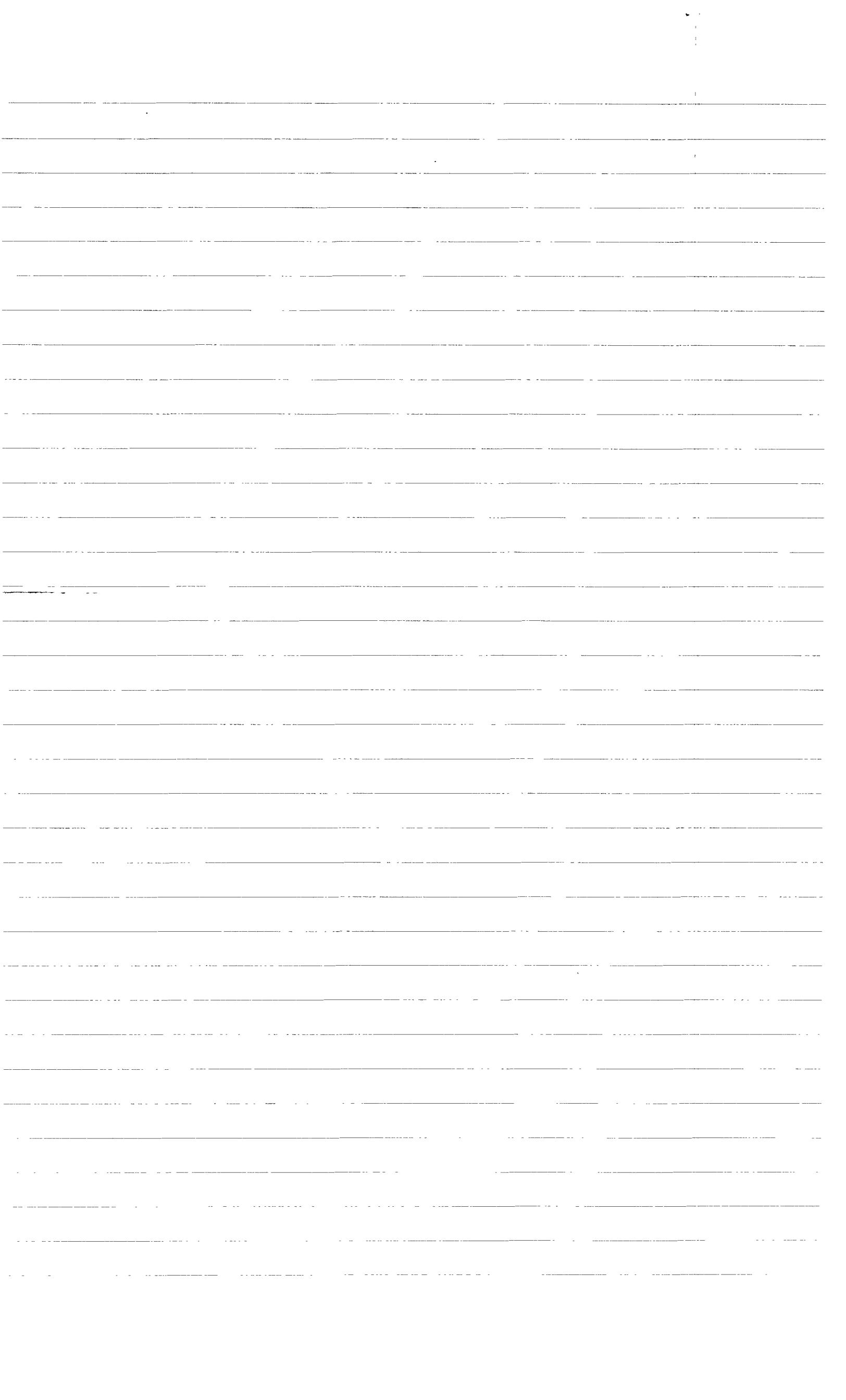
I cannot put into words how very important it is that inmates be able to keep in daily contact with family. Not only for positive encouragement and emotional support throughout their incarceration but, also, for their reintegration back into society.

I hope and pray that you put a stop to Tel link taking advantage of inmates and their families. Money should not be a factor about which inmates are able to keep bonds with their family and which one's can't. It's time to stop tearing families apart all in the name of greed.

Thank you so very much for your time and attention to this very serious matter at hand. I look forward to seeing a lot of changes in the telephone system very soon.

Sincerely,

Keith Connor



This is a Public Comment for **WC Docket Number 12-375**.

MAR 04 2013

FCC Mail Room

Dale C. Shackelford  
64613 / ICC  
P.O. Box 70010  
Boise, ID 83707

February 25, 2013

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW; Room TW-B204  
Washington, DC 20554

Dear Secretary Dortch:

I am an Idaho prisoner held in Idaho's only privately managed prison. Prior to my transfer to the Idaho Correctional Center (ICC), I spent a decade on Death Row at the Idaho Maximum Security Institution (IMSI).

At both IMSI and ICC, (inmate) pre-paid local and interstate telephone calls are billed at a flat rate of \$3.40, while collect calls to out-of-state numbers are charged both a \$3.60 connection fee, and 80¢ per minute. Calls to Canada all have a connection fee and a per minute rate of 80¢. Because the collect call rates to both interstate and Canadian numbers is identical, it is only logical that pre-paid calls to Canada should be the same rate as pre-paid interstate calls. This means that billings for all calls to Canada (and Mexico) are pure profit for the telephone company and the IDOC.

All Idaho prisons, be they state or privately managed, are all under the same contract to provide inmate telephone services. This contract with Public Communications Systems (PCS), in association with Global Tel\*Link has a documented (contractual) provision that the Idaho Department of Correction will receive a minimum \$2.86M annually in the "turn-key" operation of the telephone system.

It is further troublesome that prisoners at ICC, literally across the street from IMSI, are subjected to (effective) telephone rates 33% higher than those prisoners housed at IMSI. This is because while the RATES are the same for pre-paid flat rate calls, IMSI prisoner telephone calls automatically "time out" after 45 minutes, where all other Idaho prison telephones (privately or state managed) time out after only 30 minutes. This is the difference between paying 11.3¢ per minute and paying 7.5¢ for the exact same call. It is unclear where the money from these variances goes, or even if such funds are accounted for.

With no internet/email access, limited postal delivery and the many other restrictions placed on prisoners, their families and even attorneys, telephones are a vital part of both prison and society. Allowing prison telephone fees to remain as high as they are, with no end in sight to the proposed increases, this matter is certainly against public policy, and I would ask, on behalf of myself, my family and friends, and the millions of others affected by this issue to consider promulgating rules which would curtail these abuses.



\_\_\_\_\_  
Dale C. Shackelford



***This is a public comment for WC Docket 12-375***

David K. Hudson Bey #A179401  
Lakeland Correctional Facility  
141 First Street  
Coldwater, Michigan 49036

Received & Inspected

MAR 04 2013

FCC Mail Room

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW; Room TW-B204  
Washington, DC 20554

Dear Secretary Dortch,

My family and I have been suffering extreme hardship for the past 18 years for lack of close communication and family ties as a result of the exorbitant phone rates, surcharges, and management fees added to the regular cost of prisoner phone calls in Michigan.

The phone contracts the Michigan Department of Corrections enter into has mandatory hidden and added fees which increases the cost of each prisoner's collect and debit calls. A 30% Special Equipment Fee is presently being tacked on and billed to prisoners and their families by PCS. There is no justification for these fees.

In previous contracts entered into by the Michigan Department of Corrections the charges associated with "management" cost of doing business (plus taxes and other fees) were incorporated into the base per-minute rates, but the contract presently with PCS its a totally separate added cost. The MDOC calls it *holdback fees* to cover the vendor's expenses associated with the cost of transporting, processing and billing prisoner's telephone calls. But there is absolutely no accountability or reimbursement for the fees not used.

Being housed hundreds of miles from my family leaves phone calls as the primary means of communication and contact with my 8 year old granddaughter, daughter, and siblings. My mother and two older brothers have passed away during the time of my incarceration over the past 29 years. I have very little immediately family remaining and keeping in touch by phone with all the added management fees is causing my family and I undue hardship. My family has limited income and the prison administration does not pay me enough in prison wages to afford regular phone calls at reasonable rates. Although the MDOC offer unlimited access to phone usage, I cannot afford to use the phone regularly due to excessive rates.

PCS charges 9.9¢ per call but with the added fees I am billed 12¢ per call. I have enclosed a detailed news article as an exhibit in support of regulation and cheaper phone rates for prisoner calls.

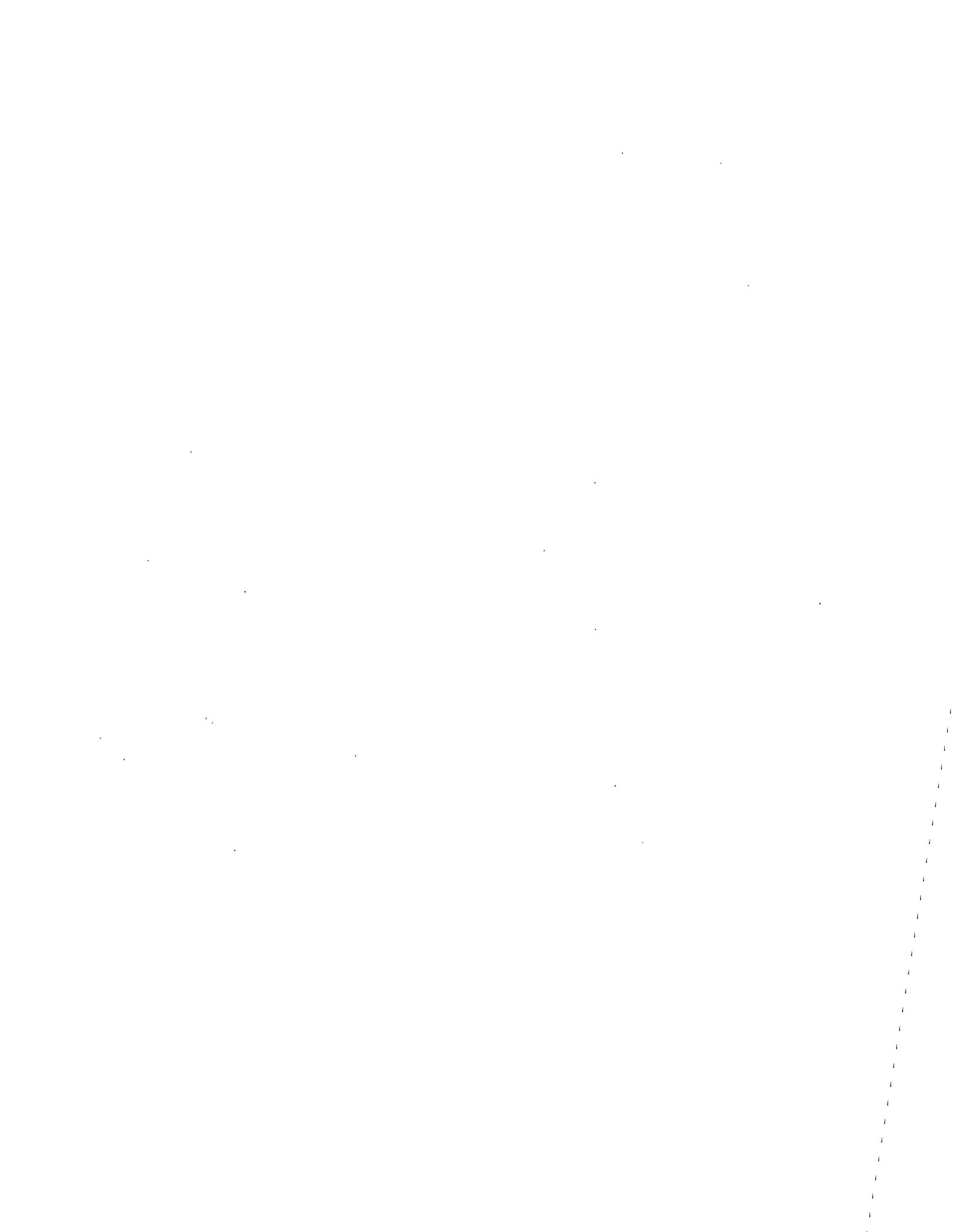
I ask that you start Regulating and Monitoring Prison Phone Calls and eliminate any burdensome added management fees or administrative cost hidden or separate.

Thank you for giving the opportunity to address these concerns.

Respectfully,



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MAR 04 2013





# MI-CURE NEWS

A QUARTERLY PUBLICATION OF  
MI-CURE, PO BOX 2736, KALAMAZOO, MI 49003-2736 (269)383-0028 February 2013

## UPDATE ON MICHIGAN PRISON PHONE SYSTEM

After months of waiting, the MDOC has finally provided us with information on what we understood was a management fee (30% of the Special Equipment Fund) being paid to the phone company PCS. In a letter dated January 10, 2013, Russ Marlan explains, "(T)he 30% 'management fee' you cite in your letter is not a management fee. It is a holdback to cover the vendor's expenses associated with the cost of transporting, processing and billing inmate telephone calls. For example, in the inmate telephone industry, many individuals accept calls, but never pay the phone bill. This leads to a fairly high rate of bad debt and uncollectible calls."

In previous contracts, the charges associated with the above costs of doing business (plus taxes and other fees) were incorporated into the base per-minute rates, rather than handled as a separate item. With this new understanding in mind, we performed a comparison of the per-minute rates for the previous (Embarq) contract and the current PCS contract. To do that we calculated the per-minute rate of PCS calls to include the base rate listed in the contract + the word search charge + 30% of the SEF fee + taxes and fees that are added. Taxes and fees vary based upon the nature of the call and the locations involved, so we calculated a minimum per-minute cost and a maximum per-minute cost. The comparisons are shown in the table below.

	PCS Max Rate	PCS Min Rate	Embarq Rate
Intrastate Collect	10.4¢	9.9¢	12¢
Interstate Collect	13.7¢	11.7¢	15¢
Intrastate Debit	9.3¢	8.9¢	10¢
Interstate Debit	11.3¢	11.2¢	12¢

In every case, the per-minute charge being paid to PCS is slightly less than the per-minute charge received by EMBARQ under the previous contract.

It remains unclear why it took so long for the MDOC to provide us with an explanation of the fee. What is crystal clear is the fact that we need to focus on the use of the Special Equipment Fund to ensure that the expenditures are justified, quantified, and end as soon as possible.

We all need to be asking legislators to demand that the department justify all of the planned expenditures. Below is a summary of the proposed purchases and some of our concerns.

The department has had personal protection systems for years.

What failures have occurred with the current system? What problems resulted from those failures? Why must they now spend \$16.4 million on integrated personal protection systems? How would the new system have prevented previous problems?

What are the weaknesses with the current camera and perimeter lighting systems? Within the past few years, the MDOC has reduced perimeter surveillances of its facilities, arguing that those were unnecessary. Why then, must we spend \$9 million for integrated camera/perimeter lighting in 18 prisons?

The Department is proposing to spend \$2.5 million for cameras at the Reformatory. Why are we spending that much money to place cameras in an old facility when we have closed newer facilities in Detroit (Mound) and Standish?

Why have we spent even \$1 on Tasers, let alone the \$1 million proposed by the MDOC? Prior to the introduction of these weapons, the MDOC relied on staff to de-escalate conflicts and resolve problems. That was apparently working. On January 27, 2011, MDOC administrator Russ Marlan was asked by a member of the House Judiciary Committee whether prison wardens believed that a good time system helps to manage prisoners. Marlan reported that the state had managed its population fine without good time credits for more that 10 years. (We would add that they managed the population fine without Tasers since the system was established.) He testified that there is an expectation that prisoners will behave themselves and follow the rules laid out by the department. If that system has worked so well, why do we need Tasers? We should be seeking ways to reduce tension in the system. All Tasers should be removed immediately.

The MDOC has notably confiscated very few contraband telephones. With universal visitor searches and random staff searches, this has simply not been a significant problem. Why then, is the department proposing to spend \$1.95 million on cell phone detection equipment?

The department is also proposing to purchase ballistic vests at a cost of \$1 million. Citizens of the state are not expecting corrections officers, parole agents, or probation agents to perform as police officers. Why are we spending \$1 million for this equipment?

Why must incarcerated persons and their loved ones purchase \$900,000 worth of equipment to ensure that officers are performing their rounds as required?

You, our readers, have a role here. Please check out our "Help Wanted" Section.

## THE IMPORTANCE OF VISITATION

In November 2011, the Minnesota Department of Corrections published the report, "The Effects of Prison Visitation on Offender Recidivism." The report was based upon a study of the effects of prison visitation on recidivism among 16,420 offenders released from Minnesota prisons between 2003 and 2007.

"Using multiple measures of visitation (any visit, total number of visits, visits per month, timing of visits, and number of individual visitors) and recidivism (new offense conviction and technical violation revocation), the study found that visitation significantly decreased the risk of recidivism.... The results also showed that visits from siblings, in-laws, fathers, and clergy were the most beneficial in reducing the risk of recidivism, whereas visits from ex-spouses significantly increased the risk. The findings suggest that revising prison visitation policies to make them more 'visitor friendly' could yield public safety benefits by helping offenders establish a continuum of social support from prison to the community."

The study concluded that...

- Any visit reduced the risk of recidivism by 13% for felony reconvictions and 25% for technical violation revocations.
- There is a decreased risk of recidivism with more frequent and more recent visits.
- The more sources of social support, the lower the risk of recidivism.

The study also cites recommendations from a 2008 study of Florida prisoners by W.D. Bales, and D. P. Mears, ("Inmate Social Ties and the Transition to Society: Does Visitation Reduce Recidivism?") on ways to foster greater visitation. Those recommendations include the following:

1. placing inmates in facilities as close to their home communities as possible
2. encouraging community service agencies and organizations to visit inmates
3. ensuring parking is available for visitors
4. expanding visiting hours to evenings and weekends to accommodate visitors who are employed or have to travel long distances
5. decreasing bureaucratic barriers to visitation
6. increasing the cultural sensitivity of staff members
7. making sure that visitation rooms are clean, comfortable, and hospitable.

The study also noted that nearly 40 percent of the individuals studied received no visits. They suggested that the system should do more to encourage visits by clergy, mentors, and other volunteers for these individuals.

Recognizing that some of these policy changes will require increased investment. The study authors conclude that the benefits in public safety will likely outweigh those costs.

*Source: "The Effects of Prison Visitation on Offender Recidivism," Minnesota Department of Corrections, November 2011*

## SPEAKING TO LEGISLATORS

On January 14, MI-CURE Director Kay Perry was among a group of individuals invited to speak with current and incoming legislators about the state of Corrections. Kay spoke about a variety of issues that concern incarcerated persons and their loved ones. With only 10 minutes to speak, Kay discussed the following issues:

Instead of paying 4¢-5¢ per minute for phone calls, those calls are costing 18¢-23¢ per minute because of the Special Equipment Fund. Despite months of effort, we still do not have details on the equipment to be purchased or when the collections for the fund will cease.

Decisions by the MDOC have arguably increased the cost of health care. For example, the \$5 co-pay for medical visits causes some individuals to delay seeing a doctor. That may expose others to infection and may mean that a disorder is not treated at an early stage when the cost of treatment is less.

The MDOC brags about feeding individuals on less than \$2 per day. The result is a reduction in the quantity and quality of food. Hungry individuals are likely eating more junk food from the commissary. The fact that some hungry individuals can afford commissary food and some cannot may well result in more tension between the "haves" and "have-nots." It is hard to conceive of added tension leading to a healthier environment.

Facilities are overcrowded as a result of premature facility closings. In addition to increasing the risks of sharing illnesses, the mental and emotional strain of living in such close quarters does not promote good health. Sanitary facilities designed for smaller populations add to the stress and challenge.

In June 2011, the MDOC reduced visiting hours in all prisons by 20%. The change places stress on the social support networks that have proven to be essential to one's successful transition from prison to the free world.

The prison phone contract that has resulted in much more expensive phone calls also places a strain on social support networks.

The department closed one Detroit prison and repurposed the other. Roughly 2,000 people were dispersed throughout the state – far from the loved ones that constituted their social support network.

The MDOC has shifted the cost of incarceration to persons who are incarcerated and their loved ones. Incarcerated persons make pennies an hour and have seen no wage increase in more than 25 years. Some have even seen pay cuts. Receiving wages that don't come close to meeting reasonable needs simply adds to the sense of hopelessness and helplessness.

MAR 04 2013

2-23

FCC Mail Room

Dear Secretary Dorch

This is a Public Comment

For WC-Docket number 12-375

My family is four and half hours away. This makes it hard for them to visit. The only outlet or way of communication is on the phone. Phone cards cost \$10 with a \$3.20 connection fee.

190 an hour is what I make coming to about forty dollars a month. A wife and two growing young girls with older parents, having the burden of sending hard earned money makes it damn near impossible to maintain any kind of long distant relations.

Every city or house divided against itself shall not stand"

Food, cosmetics, + cable fee monthly coupled with outrageous phone expenses [over please]

doesn't seem like rehabilitation  
but separation, what I'm suggesting  
is no connection fee, 5c a  
minute, one (10) minute free  
daily phone call

what's right is right.  
Thank you for your  
time!

Patrick Horgan Hu4405  
1100 Pike Street  
16654-1112 Huntingdon PA

Received & Inspected

MAR 04 2013

FCC Mail Room

2/22/13

Leonardo Mas #UG 1109  
1100 Pike St.  
Huntingdon PA 16654

Dear Secretary Dorch.

This is a public comment for WC-Docket  
number 12-375. Well I'm an inmate held  
in Huntingdon PA, 4 hours away from family  
and friends. There for I rarely get the  
chance to hear their voices. I only make  
19¢ an hour and I have to pay for my cosmetic  
Medical Co-pay, and several other expenses I  
cant afford, let alone trying to save enough  
money to make one \$5.45 phone call.

I have a family at home, a wife raising  
5 kids alone. Unfortunately I was the "breadwinner"  
and she was forced to apply for government assistance.  
There's no way she can help me. My wife & kids  
write me all the time, and they always asking  
when am I going to call. It's heart breaking &  
stressful.

I know there's a solution, and I believe you  
the only one that can help me, other families, and  
most importantly "the kids". I also believe that

our calls can be reduce to 3¢ a minute, with no connection fees. It would be really appreciated if you can find a way for those inmates that are unable to "work" to receive one (10) minute phone call per week.

thank you!  
Sincerely  
Lemardo May



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MAR 04 2013

FCC Mail Room

## Cost And Experiences: (collect Calls)

This state has set in place, that we (inmates) have to go through there phone provider when over families can get a better deal. We're only making 19¢ to 42¢ max. <sup>for collect calls</sup>

## CALL ~~and~~ Charges:

I can't afford to call that much to have a phone bill \$9.20 every time I call. For <sup>15</sup> minutes. ~~to~~  
I don't get a word in.

Dropped Calls: The call always drops. Then you have to pay a second fee for a connection.

Call Frequency: I used the phone once every 5 or 6 months.

Free Calls: The free calls, to contact our attorney and once a day. That would cover the family and children.

Disabilities Access: The disability inmates have the same problems and worst. This don't have the TTY Program phone service.

The system won't go through on a collect unless its there provider. They take a ~~call~~ connection fee and more money if you only talk for a minute. ~~The same fee~~ for collect and regular call ~~are~~ almost \$3.00