

WC Docket No. 12-375, FCC 12-167
Federal Communications Commission: Rates for Interstate Inmate Calling Services
Comment on Proposed Rulemaking

Summary of Comment:

The public benefit to children of increased regular communication between children and their incarcerated parents should be considered in any cost-benefit analysis of the proposed ICS rate cap.

Introduction:

Noting the difficulty of quantifying the costs and benefits of the proposed lower rates for interstate long distance calls from prison, the notice of proposed rulemaking on “Rates for Interstate Inmate Calling Services” sought specific comments on the cost and benefits of the proposals of ICS rate caps. This comment seeks to raise the specific issue of the benefit of cheaper interstate phone calls to children of incarcerated parents. Any cost-benefit analysis of ICS rate cap proposals should include not only the benefit of reduced recidivism of prisoners, but also the significant benefit to children of increased communication with their incarcerated parents.

ICS Rate Caps Will Benefit Children of Prisoners:

Expensive long distance calls have a considerable negative impact on children of prisoners. On any single day, 1.5 million children in the United States have a parent in prison.¹ Studies show that separation because of a parent’s incarceration can have “profound consequences” for children.² Parental incarceration can have both immediate and long-term effects on children, including “impaired ability to cope with future stress or trauma, disruption of development, and intergenerational patterns of criminal behavior.”³ Studies also show, however, that “an important determinant” of whether children adjust to having an incarcerated parent is the amount of contact.⁴ In fact, “facilitating contact has been shown to reduce the strain of separation and increase the likelihood of successful reunification.”⁵

Despite the fact that contact between a child and their incarcerated parent can have a long term impact on the wellbeing of the child, families face significant barriers to in-person visitation. Across the United States, women are housed an average of 160 miles from their minor children, and men are housed an average of 100 miles from their minor children.⁶ Visitation hours are often incredibly limited and inconvenient, usually occurring during the hours that a child’s caregiver would be at work.⁷ Because of these and other barriers, 54% of mother’s in state prison

¹ JOAN PETERSILIA, WHEN PRISONERS COME HOME 43, (Oxford University Press, 2nd ed. 2009).

² JEREMY TRAVIS, ELIZABETH CINCOTTA MCBRIDE, AMY L. SOLOMON, FAMILIES LEFT BEHIND 1 (Urban Institute, 2nd ed. 2005).

³ *Id.* at 2.

⁴ JOAN PETERSILIA, WHEN PRISONERS COME HOME 44, (Oxford University Press, 2nd ed. 2009).

⁵ JEREMY TRAVIS, ELIZABETH CINCOTTA MCBRIDE, AMY L. SOLOMON, FAMILIES LEFT BEHIND 6 (Urban Institute, 2nd ed. 2005).

⁶ *Id.* at 1.

⁷ JOAN PETERSILIA, WHEN PRISONERS COME HOME 44, (Oxford University Press, 2nd ed. 2009).

have no visitation with their child.⁸ Therefore, contact through long distance phone calls is a particularly important means for contact between families.

The high cost of long distance calls decreases the amount of contact that children can have with their incarcerated parents. Families of prisoners often cite prohibitively expensive collect calls as one reason that contact between prisoners and their children decreases significantly over time.⁹ Because it will increase the ability of children to remain in regular contact with their parents while they are incarcerated, and because of the benefit that regular contact with their parents provides to children, the ICS rate cap proposal will provide substantial benefit to the children of prisoners.

Conclusion

The FCC should consider the benefit to children of prisoners in the cost-benefit analysis of any rate cap proposal.

⁸ *Id.*

⁹ *Id.*