

MAR 26 2013

From: Robert Lattarulo - KL-7332 FCC Mail Room 3/18/13  
 SCI - Somerset  
 1600 Walters Mill Rd.  
 Somerset, PA. 15510

TO: Marlene H. Dortch  
 Fed. Communication Com.  
 445 12<sup>th</sup> St, SW; RM TW-B204  
 Washington, DC. 20554

Greetings Secretary Dortch:

This is a public comment for WC Docket Number 12-375. I am originally from the New York state area, with a lot of family & friends in the New Jersey area as well. Plainly put the long distance phone charges are so outrageous at \$20/25 plus a call that, that descriptive adjective doesn't even do it justice! The state of Penn. & the DOC should get Criminal Charges for extortion for what they are doing to inmates to talk to their

families on any kind of regular basis. For us that are calling long distance it is a real hardship to pay a \$100 plus

a month for ONE phone call a week. With a total airtime of 15 minutes a call, that's \$100 plus for an hour, ONE hour worth of communication a month for a \$100 is as I said a crime!

Please help us stop this travesty of justice. With ailing parents & kids of my OWN it's a huge psychological hardship for myself + others NOT to be able to afford to stay in contact at any greater level. And NOT only for my sense of peace of mind but more importantly my families. If there is any more that I can do to help you help us please let me know. Thank you for all of your time & careful heartfelt consideration in this matter.  
Have a Blessed Day.

P.S. If you need to write me back please make sure you include my inmate ID# KL7332 ON your mailing, or I won't get it.

Yours Truly  
Robert Jattarulo

Kendrick Lee #234426

Lakeland Correctional Facility

141 First Street

Coldwater, MI. 49036

Received & Inspected

MAR 26 2013

MS. MARLENE H. DORTCH, SECRETARY  
FEDERAL COMMUNICATION COMMISSION  
445 12TH STREET, SW; Room TW-B204  
WASHINGTON, DC 20554

FCC Mail Room

*March 19, 2013*

Subj: Public Comment For WC Docket No. 12-375

Dear Secretary Dortch:

I am writing to urge the FCC to implement a rule that would restrict and or limit the obscene rates being charged by local jails and both U.S. and state prisons for inmate phone calls.

I have been incarcerated by the state of Michigan for about 8 years and experienced three different phone rates for in and out-of-state calls to my family. Initially the MDOC and it's phone provider (sprint), from 1995 until about 2008 charged a \$3.00+ connect fee plus a \$1.00 per minute rate. Then due to Political/Legislative lobbying by MI-CURE, inmates families and other prisoner rights groups around 2008 the MDOC contracted with Embarq and inmate phone rates dropped to .10¢ per minute. These lower rates lasted three years and were then doubled to .23¢ per minute when the MDOC contracted with it's current provider PCS Metro Media. This was done after protracted lobbying by the MDOC on the legislative correction budget committee, which set up a special Slush Fund for unspecified MDOC acquisitions Funded through phone rates surcharge kickbacks. We live in fear of what rates we will be required to pay with no limits or restrictions on the MDOC's ability to inflate the phone rates with every new contract. Please Help!!!

It should be noted that prisoner wages in Michigan have not been raised since 1987 and the bulk of the population either has no job or receives about \$15.00 a month. We are then required to buy hygiene and health items from an over priced inmate store that is providing kickbacks to the MDOC in addition to trying to make phone calls to our families with inflated phone rates.

Thus, I do not call my children or brother and sisters more than once a month because at our current rates that comes to \$12.00 for four 15 minute calls. However, I have and would call them more often with reasonable and lower phone rates. A larger portion of inmates mothers, fathers, aunts and uncles etc. are on fixed incomes themselves and can't afford the collect call rates.

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Your support for the FCC adopting a sensible rule to limit the arbitrary and capricious gouging of prisoners and their families would be a service and appreciated by all of us. In fact we are a segment of the population that is least able to afford excessive phone rates.

Respectfully submitted and requested,

3/19/13

Kendrick Lee #234426



## FCC Mail Room

Many people who are incarcerated come from families who have lower to middle incomes. The extra burden placed upon families of paying exorbitant amounts of money for a fifteen-minute telephone call is excessive and unjust.

There is a trend nationally for reduction in telephone rates that are charges to prisoners. This trend is reflected by the actions taken by the introduction of a bill in the United States Congress to ensure more reasonable rates.<sup>1</sup> The American Bar Association has also passed a resolution in support of the creation of fair and reasonable telephone rates for prisoners and their families. The Bar is in favor of creating the lowest rates possible for prisoners and their families.<sup>2</sup>

The Michigan Department of Correction's phone service for prisoners is provided by Sprint. The \$67,500,000.00 contract with Sprint runs from July 7, 2001 through July 6, 2006.<sup>3</sup> The Prisons and Corrections Section has been invited to give input on the criteria for the new contract. This policy position presents six major recommendations that the Section believes should be made a part of the new contract.

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<sup>1</sup> **Federal Legislation: H.R. 4466: Family Telephone Connection Protection Act of 2005; Sponsor: Rep Rush, Bobby L. [IL-1] (introduced 12/7/2005) Cosponsors (None)**

Family Telephone Connection Protection Act of 2005 - Amends the Communications Act of 1934 to direct the Federal Communications Commission (FCC) to consider the following types of regulation of inmate telephone service: (1) prescribing a maximum uniform per-minute rate (paid to telephone service providers); (2) prescribing a maximum uniform service connection or other per-call rate; (3) prescribing variable maximum rates depending on factors such as carrier costs or the size of the correctional facility; (4) requiring providers of inmate telephone service to offer both collect calling and debit account services; (5) prohibiting the payment of commissions by such providers to administrators of correctional facilities; and (6) requiring such administrators to allow more than one service provider at a facility so that prisoners have a choice. See Library of Congress <http://thomas.loc.gov/cgi-bin/bdquery/z?d109:HR04466:@@D&summ2=m&>

<sup>2</sup> Language of the ABA's Recommendation, "Resolved, that the American Bar Association encourages federal, state, territorial and local governments to afford incarcerated people every reasonable opportunity to maintain telephonic communication with the free community consistent with the constraints of sound correctional management principles, and to offer the broadest possible range of telephonic services and pricing options in the correctional setting at the lowest possible rates."

<sup>3</sup> An extension was recently granted to take the contract through July 6, 2006.

### **Problem 1—Commission Rates**

Currently, prisoners' families, friends, and attorneys are charged the following rates every time a prisoner makes a collect telephone call for fifteen-minutes:<sup>4</sup>

Local Collect: \$2.00  
IntraLATA Collect: \$4.10  
InterLATA Collect: \$7.83  
InterState Collect: \$17.34

The DOC incurs a commission from the gross revenue that is collected by Sprint. This commission rate is 50.99% and results in a revenue stream of \$13.5 M in commission dollars.

### **Recommendation 1—Reduction and Elimination of Commission Rates**

The commission rate should be set so that no one makes money off of prisoners' calls. Ideally, a commission would not exist at all; however, if it is necessary the commission rate could be adjusted to cover MDOC operating costs. The commission rate could be phased out over a period of five years.

### **Problem 2—Debit Call Rates**

In 2005 the MDOC amended the current Sprint contract so that prisoners would be able to make debit calls from prison. Prisoners now have the choice to put money into a pre-paid account. The burden of payment then falls on the prisoner rather than on his/her family, friends, or attorney. However, the rates of a debit call are exactly the same rates as a collect call. "Michigan is the only state that provides debit calling at the same rate as collect calling."<sup>5</sup>

This is not the case in other States that use both collect calling and debit calling. At least 12 states and the federal system offer debit calling at reduced rates (CO, KS, MD, MN, NE, ND, NM, OR, PA, SD, TN, VT).

Out of 45 states that the Campaign to Promote Equitable Telephone Charges was able to maintain rate data from, MI has the 12<sup>th</sup> highest rates for both debit and collect calls in the Nation.<sup>6</sup>

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<sup>4</sup> LATA definitions: Local Access and Transport Area (LATA)—A geographic area established for the provision and administration of communications service. It encompasses one or more designated exchanges, which are grouped to serve common social, economic and other purposes.

IntraLATA—Communication within a LATA

InterLATA—Communication between two different LATAs

Intrastate—Communication to and from locations within a state

Interstate—Calls from one state to another.

<sup>5</sup> From The Campaign to Promote Equitable Telephone Charges, <http://www.etccampaign.com/etc/national.php>

<sup>6</sup> From The Campaign to Promote Equitable Telephone Charges, <http://www.etccampaign.com/etc/national.php>

**A Sampling of Collect Call Rates Versus Debit Call Rates in 7 States:**

	MI	CO	NM	MD	MN	LA	NE
Local Collect	\$2.00	\$2.46	\$2.15	\$0.85	\$1.75	na	\$1.00
IntraLAT A Collect	\$4.10	\$5.11	\$4.38	\$7.05	\$4.95	na	\$1.80
InterLAT A Collect	\$7.83	\$6.60	\$4.38	\$7.05	\$6.45	na	\$2.25
InterState Collect	\$17.34	\$17.30	\$10.50	\$7.20	\$11.75	na	\$3.75
Local Debit	\$2.00	\$1.25	\$1.80	\$0.50	\$0.35	\$2.00	\$0.80
IntraLAT A Debit	\$4.10	\$4.00	\$3.60	\$4.50	\$5.10	\$4.85	\$1.50
InterLAT A Debit	\$7.83	\$4.10	\$3.60	\$4.50	\$5.10	\$5.68	\$1.80
InterState Debit	\$17.34	\$4.10	\$7.50	\$4.50	\$5.10	\$7.50	\$3.00

***Rates in Chart from The Campaign to Promote Equitable Telephone Charges***

In the MDOC/ Sprint contract, Sprint asserts that the debit management system, "Eliminate[s] the need for an inmate to use administrative phones to place collect calls to attorneys and others who do not accept collect calls, and afford a lower calling rate to the inmate and the called party. Sprint will offer the same premise fee to the State for debit-based calls as for collect calls, but will also be open to offering further reduced rates for the calls in lieu of a portion of the premise fee to the State (Contract 54)."

The State has chosen to not reduce the rates for debit calls.

**Recommendation 2—Reduction of Debit Call Rates**

The MDOC should reduce the rates of Debit Calls so that the rates are fair and reasonable and comparable to Debit Call rates in the free-community. There should be no mark up on Debit Calls.

**Problem 3—Phone Blocking caused by Discrepancies with Billing**

Currently, if a family member, friend, or attorney does not use a telephone provider that is compatible with Sprint via Evercom, he or she must provide pre-payment into an account. The minimum amount that must be in the account is \$50.00.<sup>7</sup> The loved one or attorney is given telephone announcements that provide the amount of

<sup>7</sup> According to the *Sprint Telephone Service Guide: General Instructions and Debit* (in this case debit refers to the pre-payment account for non-Sprint compliant phone company users) *Management System*, "The account is established with a minimum payment of \$50.00 required in a guaranteed form such as Western Union, Cashier's Check, or Money Order. Sorry, no personal checks accepted."

money left in the account, but he or she is never provided with an actual written statement regarding the status of the account.

If there is not money left in the account the person's phone is blocked. There are times when prisoners' loved ones' phones are blocked for no apparent reason.

### **Recommendation 3—Removal of Phone Blocks caused by Discrepancies with Billing**

Phones should only be blocked for security reasons or if a person receiving phone calls has failed to pay for prior phone calls from a prisoner. People should not be penalized for failure to pre-pay on an account that they do not receive billing statements. Furthermore, the RFP for the new contract should clearly state that the company who is chosen must have a consistent billing service that recognizes all major phone service providers in the nation. People should not be forced to use Sprint as their phone provider, so that the billing process runs more smoothly.

### **Problem 4—No Calls Allowed to Cell Phones**

Currently, prisoners are not allowed to make calls to cell phones. Many people have chosen to use cell phones as their primary phones, because cell phone rates are often lower than landline rates. The current contract does not mention problems with technology; it simply states that prisoners cannot complete calls to cell phones.

### **Recommendation 4—Allow Prisoners to Make Calls to Cell Phones**

Absent a showing of legitimate security issues, prisoners should be able to make telephone calls to cell phones. If there are technical alterations that must be made in order to implement a Department wide policy for calls to cell phones, this should be negotiated in the contract.

### **Problem 5—Excessive Branding for Attorneys**

While talking to a prisoner on a collect call or a debit call, a brand (a electronic statement issuing a warning about where the calls is originating from) comes through the telephone at least 3 times. These brands cut seconds off of an already expensive fifteen-minute call. An attorney who accepts a call from a client is well aware that he or she is speaking to a prisoner (as are most people who accept calls from prisoners).

### **Recommendation 5—Remove Brands for Attorneys**

The branding on attorney calls has now been eliminated. It is recommended that the practice of not branding on attorney calls be continued.

### **Problem 6—20 Minute Time Limit on Calls to Attorneys**

Calls to attorneys are limited to 20 minutes. This time is too short for legal calls. Generally, this short period will result in one or two more calls back to that attorney.

### **Recommendation 6—Calls to Attorneys**

The time limit for each call to an attorney should be increased to thirty minutes. If more phones are needed on the premises as a result of the increased length of attorney calls, more phones should be added.

## Summary

In Summary, the Prisons and Corrections Section recommends that the State of Michigan and the Department of Corrections make every attempt to negotiate a telephone provider contract that provides fair and reasonable rates for prisoners and their families, friends, and attorneys. Furthermore, the contract should consider the needs of this specific population. The telephone is a major tool for prisoners to stay connected to their support networks and prepare for eventual reintegration back into the community. Therefore, efforts should be made to make the process of calling loved ones smooth and affordable. The six recommendations listed above will help facilitate a more equitable telephone system for prisoners, and the recommendations help to support the important work of the MDOC's re-entry initiative.

The text (may be provided by hyperlink) of any legislation, court rule, or administrative regulation that is the subject of or referenced in this report:

N/A

### **RECOMMEND STATE BAR ACTION ON THIS ISSUE:**

Arguments against the position (if any):

None reported

If the State Bar currently has a position on this subject matter, state the position, and an analysis of whether the recommended position and the current State Bar position are in conflict.

To date, the State Bar of Michigan does not have a position on this matter.

Fiscal implications of the recommended policy to the State Bar of Michigan:

None to the State Bar of Michigan.

### **FOR LEGISLATIVE ISSUES ONLY:**

This position falls within the following Keller-permissible category:

The regulation and discipline of attorneys

The improvement of the functioning of the courts

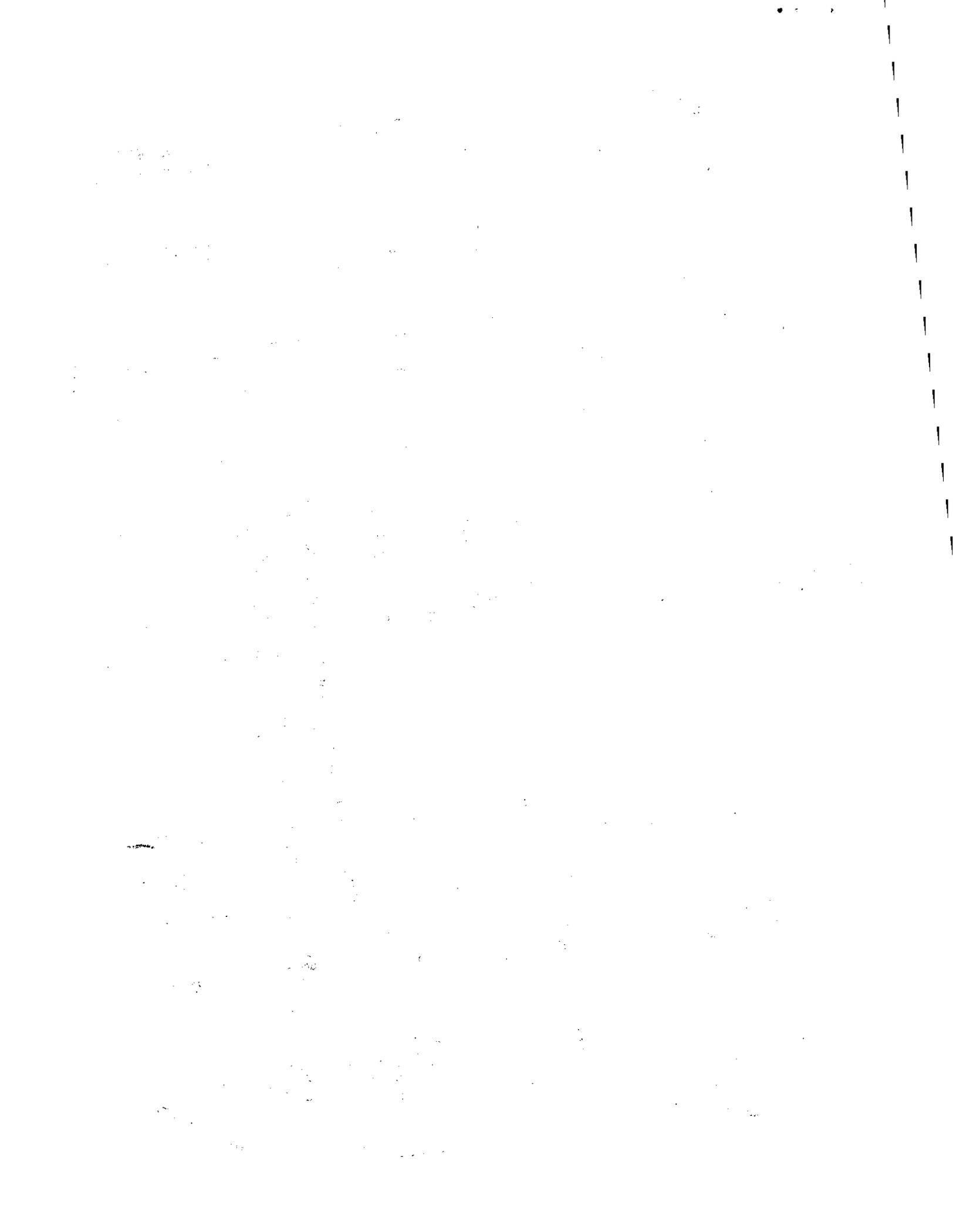
The availability of legal services to society

The regulation of attorney trust accounts

The regulation of the legal profession, including the education, the ethics, the competency, and the integrity of the profession.

Keller-permissible explanation:

This does not impact on any of those listed above.



## Rates by State

		Cost of a 15-Minute Phone Call by Call Type							
		Collect				Debit or Prepaid			
State	Telephone Company	Local	IntraLATA	InterLATA	Interstate	Local	IntraLATA	InterLATA	Interstate
AK	Securus Technologies	\$0.00	\$2.16	\$4.23	\$17.30	n/a	n/a	n/a	n/a
AL	Securus Technologies	\$2.85	\$2.85	\$5.25	\$14.15	n/a	n/a	n/a	n/a
AR	Global Tel*Link	\$4.80	\$4.80	\$4.80	\$10.70	n/a	n/a	n/a	n/a
AZ	Securus Technologies	\$1.84	\$4.50	\$5.40	\$7.80	\$1.60	\$4.20	\$5.10	\$7.50
CA	Global Tel*Link	\$1.45	\$1.45	\$2.03	\$6.65	n/a	n/a	n/a	n/a
CO		\$6.20	\$6.20	\$6.20	\$17.30	\$3.20	\$3.20	\$3.20	\$4.60
CT	Global Tel*Link	3.55	\$5.20	\$5.20	\$17.30	\$2.66	\$3.90	\$3.90	\$12.98
DC	Inmate Telephone Inc.(ITI)	\$1.75	\$1.75	\$1.75	\$1.75	\$1.30	\$1.30	\$1.30	\$1.30
DE	Pay Tel	\$4.95	\$4.95	\$4.95	\$9.45	n/a	n/a	n/a	n/a
FL	Securus Technologies	\$0.50	\$1.82	\$1.82	\$1.82	\$0.50	\$1.82	\$1.82	\$1.82
GA	Global Tel*Link	\$2.70	\$4.85	\$4.85	\$17.30	n/a	n/a	n/a	n/a
HI		(We have not been able to gather this information.)							
IA	Public Communications Service	n/a	n/a	n/a	n/a	\$2.00	\$4.85	\$5.68	\$7.50
ID	Public Communications Service	\$3.60	\$3.60	\$3.60	\$15.60	\$3.40	\$3.40	\$3.40	\$14.65
IL	Consolidated Communications Public Services, Inc.	(We have not been able to gather this information.)							
IN	Global Tel*Link & Securus Technologies	\$2.95	\$6.75	\$5.00	\$5.00	\$2.95	\$3.75	\$3.75	\$3.75
KS	EMBARQ	\$2.61	\$3.80	\$8.11	\$7.70	\$2.19	\$3.21	\$6.97	\$6.55
KY	Global Tel*Link	\$1.85	\$4.50	\$4.50	\$6.50	n/a	n/a	n/a	n/a
LA	Global Tel*Link	\$0.98	\$5.58	\$5.30	\$7.05	n/a	n/a	n/a	n/a
MA	Global Tel*Link	\$2.36	\$2.36	\$2.36	\$13.35	\$1.78	\$1.78	\$1.78	\$10.05
MD	Securus Technologies	\$0.85	\$7.05	\$7.05	\$7.20	\$0.50	\$4.50	\$4.50	\$4.50
ME	(Owned by Department of Corrections)	\$5.30	\$5.30	\$5.30	\$13.35	\$4.50	\$4.50	\$4.50	\$4.50

## Rates by State

		Cost of a 15-Minute Phone Call by Call Type							
		Collect				Debit or Prepaid			
State	Telephone Company	Local	IntraLATA	InterLATA	Interstate	Local	IntraLATA	InterLATA	Interstate
*MI	EMBARQ	\$1.80	\$1.80	\$1.80	\$2.25	\$1.50	\$1.50	\$1.50	\$1.80
MN	Global Tel*Link	\$1.75	\$4.95	\$6.45	\$17.30	\$0.35	\$4.80	\$4.80	\$4.80
MO	Public Communications Service	\$2.50	\$2.50	\$2.50	\$2.50	\$1.50	\$1.50	\$1.50	\$1.50
MS	Global Tel*Link	\$2.60	\$4.90	\$4.90	\$13.35	n/a	n/a	n/a	n/a
MT	Public Communications Service	\$5.75	\$5.75	\$5.75	\$5.75	n/a	n/a	n/a	n/a
NC*	Global Tel*Link	\$1.05	\$3.65	\$3.75	\$17.30	n/a	n/a	n/a	n/a
ND	Securus Technologies	\$5.13	\$5.13	\$6.06	\$6.06	\$0.75	\$0.75	\$5.10	\$5.10
NE	Global Tel*Link	\$1.00	\$1.80	\$2.25	\$3.75	\$0.80	\$1.50	\$1.80	\$3.00
NH	Inmate Communication Solutions	\$2.20	\$2.70	\$2.70	\$2.70	\$1.50	\$2.25	\$2.25	\$2.25
NJ	Global Tel*Link	\$2.50	\$4.75	\$7.75	\$15.10	\$2.09	\$4.04	\$6.59	\$12.89
NM	Public Communications Service	\$2.15	\$4.38	\$4.38	\$10.50	\$1.80	\$3.60	\$3.60	\$7.50
NV	Global Tel*Link	\$1.46	\$4.27	\$5.03	\$17.30	\$1.46	\$4.27	\$5.03	\$17.30
NY	Value Added Communications	\$0.72	\$0.72	\$0.72	\$0.72	\$0.72	\$0.72	\$0.72	\$0.72
OH**	Global Tel*Link	\$1.14	\$3.94	\$5.87	\$16.97	\$0.91	\$3.15	\$4.69	\$13.58
OK	Global Tel*Link	\$3.60	\$3.60	\$3.60	\$3.60	n/a	n/a	n/a	n/a
OR	Global Tel*Link	\$2.35	\$4.14	\$14.30	\$17.30	\$1.75	\$2.81	\$9.10	\$10.60
*PA	Securus Technologies	\$2.20	\$5.00	\$6.55	\$12.61	\$2.20	\$5.00	\$5.55	\$9.75
RI	Securus Technologies	\$0.70	\$0.70	\$0.70	\$5.80	\$0.63	\$0.63	\$0.63	\$5.22
SC	EMBARQ	\$1.15	\$4.91	\$7.95	\$8.20	\$0.92	\$3.93	\$6.36	\$6.56
SD	Securus Technologies	\$2.71	\$6.30	\$9.60	\$11.00	\$1.25	\$3.60	\$3.80	\$3.80
TN	Global Tel*Link	\$1.00	\$3.35	\$4.64	\$14.30	\$0.90	\$3.02	\$4.18	\$12.87
TX	Embarq/ Securus Technologies	\$3.90	\$3.90	\$3.90	\$6.45	\$3.45	\$3.45	\$3.45	\$5.85

Boymah Traub CJ-0593  
175 Progress Drive  
Waynesburg, PA 15370

Received & Inspected

MAR 26 2013

FCC Mail Room

March 20, 2013

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

This letter is a public comment for WC Docket Number 12-375

Dear Secretary Dortch:

I am sending you this letter in order to enlighten you as to my experience with these exuberant phone rates. I will be brief and to the point addressing every issue that is relevant to me. Starting first with the pricey cost of my phone calls. I am from Philadelphia, incarcerated at S.C.I. Greene in Waynesburg, PA which is about 5½ hours from Philadelphia. I pay \$5.15 for a 15 minute call, and this is for a pre-paid account card that I purchase here at the Commissary, when I call my family collect, which I can no longer do, the calls cost almost \$6.70. We are unable to call our families collect even if they do have long distance because Global Tel.Link's system has prevented collect calls from being made unless our family set up an independent account, separate from their already existing long distance, with them exclusively for inmates calling from State Prisons. These exuberant rates has been burdensome for my family as well as myself. If I were to call my mother, the children and siblings my family and I would be paying well over \$200.00 dollars a month. I am only paid .42¢ an hour. My monthly income at .42¢ an hour is \$61.74. Therefore, I definitely do not have the money to shell out every month. I still have to purchase the pre-paid phone cards in order that I maintain communication with my family. I am well aware that my actions placed me in this situation but I thought after one is tried and convicted then the rehabilitation begins, not that one is punished after having been punished. And my family is also being punished. I was convicted of committing a crime not them. So where's the justice and fairness in that?

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As for experiencing dropped calls; I experience these dropped calls every so often. Here at this institution the procedure is different; instead of a dropped call the call is cut short by the automated announcement "three-way call alert", but there's no one making or using a three-way call. After I make the initial connection with my family which is \$2.55 for acceptance and I'm on the phone for about 7½ minutes and I get cut off by the infamous "three-way call alert", if I call back then I won't be able to call them the next week because I would not have enough left to get a full phone call. I have a mother who lives alone and children who like to inform me about the progress in school, report cards and the likes. It's frustrating because I can't use the phone as often as I would like. Yes if the rates were lower I would be able to communicate more frequently with my loved ones enabling me to maintain the ties that I holding on to and rebuild family ties that have been broken due to the lack of communication and my distance from city.

In closing, I hope that there will be some change made for the better of us as inmates and family members who are struggling to maintain the bonds of kinship. Submitted by one who seeks reform, not just for self but for the system.

Sincerely,

A handwritten signature in cursive script that reads "Boymah Traub". The signature is written in black ink and has a long, horizontal flourish extending to the right.

Boymah Traub

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Date: 03-15-2013

From: M. Garrett  
MDOC 580170  
Lakeland C.f.  
141 First Street  
Coldwater, MI 49036

Received & Inspect

MAR 26 2013

FCC Mail Room

To:

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

Subject: Public comment WC Docket# 12-375

To whom it may concern:

The phone rates for prisoners are too high esp. int the state of Michigan ( MDOC ). Prison phone rates are unreasonably high and this mainly hurts the prisoners family members. There are too many dropped calls for such high rates. Please help.

Sincerely ,

Garrett



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MAR 26 2013 3-19-2013

Dear Secretary Doatch,

My name is James Carlson #6004081 <sup>FCC Mail Room</sup> Inmate in Lansing Correctional Facility in Kansas (KDOC).

March 1<sup>st</sup> 2013 my phone calls went from \$1.96 for a 2 hour phone call to \$21.60 for 2 hours of phone calls. Phone calls went to .18¢ a minute. It was a flat rate before. They know that they can charge what ever they wish and we can't do anything about it. It's called priced gouging and our families who pay the bill are the victims - they don't pay phone rates with any phone company that outrageous - it clearly shows that we are being ~~to~~ priced upon by these phone rates.

We and my wife no longer can afford to do Bible Study daily.

I can't be a father to my son due to the cost of calls now. It is separating families, distancing loved ones and severing ties to our family who we need to bond with, they are what we ~~connect~~ need to put together Release plans, to find jobs to Repair our pasts so we can be successful upon our Release.

If we could talk to our families we would be better people. Have better Release strategies. We could have spiritual connections, be fathers be apart of our kids lives. We have 3 connections - phones, visits & e-mail. They sever what makes us better people - our ties to our families. Our kids will

never get to know us. Prisoners need their families, phone companies know this and will destroy our families before giving up a profit.

I went from years of calling daily for \$1.96 a call - 2 calls a day sometimes more, that's approx. 7,200 minutes a month to 653 minutes approx. destroying our family, relationships - they are making profits and that's all that matters !!.

They are victimizing us? Our families! On top of that our families pay extremely high rates to put money on the phone. Something like \$6<sup>00</sup> - \$10<sup>00</sup> to put money on the phone!!! So they victimize all the way around due to our hardships. If only one phone company existed in society and they could charge whatever they wanted... (\$21.60 for 2 hours there would be major consequences because of the public out cry but is hear who do we air our grievances to??? We are trapped and easy prey. So we must accept being their victims, our families too.

Please HELP!

P.S. Someone or "someones" in power in KDOC gets paid to let them victimize us. How do we find out where the "profits" go? Who's paid, how much etc.? It's criminal! If the power of KDOC didn't get kick backs they wouldn't increase the rates so drastically.

James Carlson  
James Carlson

Received & Inspected

MAR 26 2013

FCC Mail Room

Dear Secretary Dortch,

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

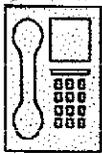
Hello my name is Connie Bramblett. I have used Securus Billing Services for several years now. It has been everything but pleasant. I have spent thousands of dollars over the years and the customer service is awful. I keep money on the phone weekly because I have had several health scares and so has my mother. We stay in contact with my husband on a daily basis. At the beginning of March the institution my husband is at tried to decrease the rates to save the inmates and their family's money. They changed the rates from \$2.04 for a 20min call to \$1.35 to connect and .15 a minute which came out to \$4.81 a call. No one was made aware of this change, and until there was no more money on the phone we didn't know. I called Frankfort and it was changed back. We have so many dropped calls and interruptions that end as drop calls for third party. I asked Securus about this because I have been charge three calls this month for calls that were less than a minute for that reason. Their response is that the machine can pick up on a dog barking, the TV, any outside noise and it thinks there is a third party. When you call customer service, which is in Mexico and Texas it is very difficult to speak to someone who speaks English. The hold times are 20 minutes or better most of the time. I understand our loved ones are incarcerated and most consider them to be a burden on society as well. Most of the people on the outside are single families that are struggling to make ends meet. Being in contact with our loved ones is very important to us and the only communication some have. I beg you to reconsider using some other company with more customer friendly service, not to mention less problems overall. They don't reimburse dropped calls, the service constantly has dropped calls, and it makes a difficult situation more difficult.

No. of Copies rec'd 0  
List ABCDE

Sincerely

Connie Bramblett  
10607 Charlene Drive  
Fairdale, KY 40118  
502-938-1966

# Prison-phone-justice



## CAMPAIGN FOR PRISON PHONE JUSTICE

**MAG-NET**

**WORKING NARRATIVES**

**HUMAN RIGHTS  
DEFENSE CENTER**

### JOIN THE CAMPAIGN FOR PRISON PHONE JUSTICE!

After nearly a decade, the Federal Communications Commission (FCC) has finally issued a "Notice of Proposed Rulemaking" to lower the cost of prison phone calls! The FCC is now seeking input regarding problems with the prison phone system and how to make phone rates "just and reasonable."

You have until [REDACTED] to submit public comments to the FCC. Even if you have sent comments before, you can resubmit them or submit new information. Please write to the FCC, addressing any of the following topics:

- **Costs and Experience:** How much do you and/or your family pay in prison phone bills per month? What has been your experience with collect calls, debit calls and/or prepaid accounts?
- **Call Charges:** How much do you or your family pay in connection charges and per-minute rates for phone calls? Do you and/or your family have to pay extra fees to make or accept calls, such as costs to set up, add money to or cancel an account?
- **Dropped Calls:** How often are calls dropped or disconnected? Does it happen on a regular basis? Do you pay connection fees twice if the call is dropped and you call right back?
- **Call Frequency:** How often do you use the prison phone system to communicate with loved ones? Would you talk with them more often if the phone rates were lower?
- **Free Calls:** The FCC is seeking comments on whether they should mandate a certain amount of "free calling" time per prisoner each month. How would that impact you, your family and/or children?
- **Disabilities Access:** What type of access do prisoners who are deaf and hard of hearing experience while incarcerated? Are the rates for TTY calls the same as for regular prison phone calls?

Comments sent through the U.S. Postal Service should be mailed to:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Address the letter to "Prison Phone Justice", and please speak from your own personal experience. You must state the following at the top of the letter: "[REDACTED]". Your comments will be made part of the public docket.

We also need your help organizing on the outside. Ask your family members to sign up for the Campaign for Prison Phone Justice at [REDACTED]. They can also register their comments online, directly with the FCC, at [REDACTED].

Only with your support will we end the abusively high costs of prison phone calls. Encourage others to join us in this struggle!

Received & Inspected

MAR 26 2013

Received & Inspected **FCC Mail Room**

MAR 26 2013

**FCC Mail Room**

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

RE: This is a public comment for WC Docket Number 12-375

Dear Ms Dortch:

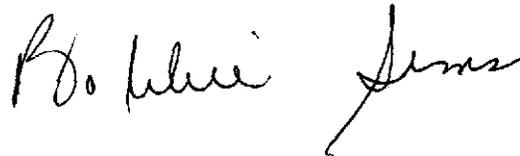
I am writing to express my outrage and disapproval of the exorbitant rates the "for profit prison phone industry" has on me and my family. Interstate calls range from \$9.20 to \$12.00 per fifteen minute calls and intrastate calls range from \$5.15 to \$7.00 per fifteen minute calls. By no stretch do I come from a family of means, so such rates put communication by phone all but out of reach for me. Dropped calls are a common theme with no easy source for reimbursement, particularly if the call is placed by the prisoner using purchased phone time through the commissary. At this prison there is also no access for prisoners with disabilities to place calls, particularly hearing impaired prisoners. My inmate pay is only pennies per hour but I am forced to pay phone rates that are 100% more than those charged in the free society.

State sanctioned monopolies for prison telephone companies encourage exorbitant phone rates for incarcerated persons, their families and friends. High prison phone rates -effectively regressive taxes - reduce communication between incarcerated persons, their families and friends.

Research undeniably demonstrates that increased communication with family and friends during incarceration reduces the risk that incarcerated persons will re-offend following their release. Neither prison phone companies nor state prison systems have an incentive to lower prison telephone rates. As a result, incarcerated persons, their families, friends, and the public suffer while prison phone companies, and the government agencies they contract with, profit.

Government regulation of this predatory industry is the best solution. The FCC should set price caps on interstate prison phone rates by approving the Wright Petition. State governments should refuse to engage in the collusive and pernicious practice of accepting kickbacks from prison phone companies. In sum, federal regulation of this industry is imperative.

Sincerely,



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SECRETARY MARLENE H. DORTCH

Received & Inspected

FEDERAL COMMUNICATIONS COMMISSION

MAR 26 2013

445 12<sup>TH</sup> STREET, S.W. ROOM TW-8234

FCC MAIL ROOM

WASHINGTON, DC, 20554

MARCH 20, 2013

DEAR SECRETARY DORTCH, THIS IS A PUBLIC COMMENT FOR WC-DOCKET NUMBER 12-375 THE FOLLOWING IS A LIST OF A FEW TO HELP INMATES KEEP IN CONTACT WITH THEIR FAMILIES.

- ① THAT WE INMATE IN PENNSYLVANIA DON'T MAKE A LOT OF MONEY - 19¢ A HOUR MOST IS 41¢ HOUR AND THOSE WHO DON'T WORK RECEIVED \$15.90 A MONTH TO THEY CAN GAIN EMPLOYMENT THROUGH THE D.O.C. AFTER BUY HYGIENE MATERIALS SO CAN'T AFFORD ANYTHING ELSE. ESPECIALLY PHONE CALLS FOR \$5.40 OR MORE. SO SOME PEOPLE'S CAN'T TALK TO THEIR FAMILIES FOR MONTHS SOME-TIMES YEARS.
- ② ONCE I CALL AND IF MY FAMILY HAVE A IN COMING CALL, WITH ANSWERING THE CALL THE PHONE WILL CLICK OFF AND I HAVE TO CALL BACK WITH A NEW RECONNECTIONS FEE.
- ③ ONLY CERTAIN PHONE SYSTEMS HAVE COLLECT CALLS, MY FAMILY THEM PHONE BILLS AND THEY STILL WON'T LET THEM ACCEPT COLLECT CALLS. ON BEHALF OF ALL THE INMATE WE APPRECIATE IT IF YOU CAN MAKE THESE CHANGES FOR US TO MAKE IT WHERE WE CAN CALL OUR FAMILIES AND COMMUNICATION WITH OUR LOVE ONES THANK YOU FOR YOUR TIME AND CONSIDERATION.

HARRY PUGH KCG909

1000 FALLS ROAD

DALLAS TX 75242

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

Marlene H. Dortch,  
Secretary Federal Communications Commission  
445 12<sup>th</sup> St., SW, Room TW-B204  
Washington, DC 20554

Received & Inspected

MAR 26 2013

FCC Mail Room

Dear Secretary Dortch:

My name is Monica Williams and my younger brother has been incarcerated for the last 13 years. In that time I have learned that there are lots of entities willing to take advantage of inmates and their families. The fact that your family member is incarcerated is hard enough but having people take advantage of that fact is unconscionable. Families have no choices regarding phone carriers and we have to pay outrageous prices to talk to our loved ones. We are prohibited from looking at cheaper options because we have no options. I do not remember what the exact amount of surcharges were back when the phone companies billed us but I know the cost of a phone call was more expensive than a regular call to someone else it was even itemized differently on our bill.

Now, we have to go through Global Tel-Link and pay via credit card or check via mail and keep track of our own account balance. Having to pay in advance and not having access to how much per minute a call costs me is frustrating. I asked Global Tel Link how much each call would cost me because every call is limited to the same amount of time by the prison and Global Tel Link told me they couldn't tell me how much it would cost. Global Tel-Link said that I have to call a specific number each time I want to know how much money I have left on my account and if I do not have enough money on the account already pre-paid my brother's phone call is denied. I mailed a check to Global Tel Link two weeks ago and the money still has not been applied to my account. Furthermore, we pay more money per minute to talk to our loved ones and Global Tel Link won't even tell me how much I am being charged per call. That is my money and I feel I have a right to know how much I am spending per call and receive an itemized bill so I know when and where my hard earned money is going. However, this is another example of the unfair and unjust treatment we are forced to endure. The bottom line is I love my brother and the distance makes it hard to get to see him often so I have no choice at present but to pay WHATEVER the company demands. Just because my brother is incarcerated does not mean that the families of those incarcerated should be taken advantage of by outside entities looking to cash in on our misfortunes. Added to that these entities are legally allowed to prey upon and more than willing to take advantage of an unfortunate situation.

We have no voices because very few are willing to give either inmates or families of inmates the time or chance to voice concerns. The very nature of imprisonment has such a stigma related to it that no matter how hard or how long we shout no one listens. Imagine how it would feel to shout about a grievance where you justly grieved and have no one listen.

Sincerely,  
Monica M. Williams

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List # \_\_\_\_\_

0

John Daggett #1180614  
Buckingham Correctional Ctr.  
P.O. Box 430  
Dillwyn Va. 23936

March 20, 2013

Received & Inspected

MAR 26 2013

FCC Mail Room

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

Re: Public Comment for WC Docket Number 12-375

Dear Secretary Dortch,

I have been incarcerated in the Virginia Department of Corrections for seventeen and a half years. Yesterday was my sons eighteenth birthday. I called to talk to him for the first time in a year and a half. Nine minutes into the call the computer cut us off. I was literally sick to my stomach. I accept responsibility for my crime and am paying my debt to society for it. It is sad that I am being taken advantage of by greedy phone companies that been awarded dubious contracts that line the pockets of DOC and phone company officials with exorbitant rates.

It costs me fourteen dollars to call and talk to my son for twenty minutes. I pay the phone bill out of my meager prison wages because I resolutely take responsibility for my incarceration and cannot put any more burden on my former wife

No. of Copies rec'd 0

MAR 26 2013

This is a public comment For the Pocket  
Number 12-375

ECG Mail Room

Dear Secretary Dortch:

I call my mother, who is 83 years old, every Sunday and I have had nothing but problems from the phone service provided by GTL Tel\*Link. They recently forced everyone to prepay all of their phone calls and advertised that it would cost them less money to do so; yet my mom's rates are higher than mine. I also have my calls cut short on a regular basis. The situation is criminal by nature, do to the fact that they are overcharging and constantly taking advantage of the unsuspecting public. I cannot believe that there has not been a class action lawsuit to resolve this matter. I know that I speak for everyone who makes phone calls through the prison system, when I ask that serious consideration be given to resolve this matter and put an end to the injustice that we all endure, just to stay in contact with our families and loved ones.

Copies rec'd  
L12AS0DE

Sincerely,  
Brian K. Peteri  
Brian K. Peteri #1124573

TORRANCE A. GRAHAM SR 11507300  
LAKELAND CORRECTIONAL FACILITY  
141 FIRST STREET  
COLDWATER, MI 49036

Received & Inspected

MAR 26 2013

FCC Mail Room

MARCH 18, 2013

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW-Room TW B-204  
Washington, DC 20554

RE: WC Docket Number 12-375

Dear Secretary Dortch,

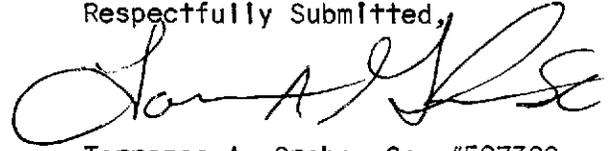
It is my sincere hope that after reading this letter you are inspired to enact law/rules that will reduce the cost of prisoners phone calls. Under the current phone contract with PCS, prisoners and their families pay .20¢ and 22¢ per minute respectively for local calls via the debit system for prisoners and collect calls for the families. Out of state calls are .25¢ and 28¢ per minute using the same debit and collect call format. PCS, also charges a \$6.00 set up fee to open a phone account with them. So for example if the prisoner's family wants to put \$25.00 in the account it costs them an additional \$6.00 plus tax to set up this account. The Michigan Department of Corrections (MDOC) only pays .04¢ per minute for the same phone calls. PCS/MDOC, justification for the additional .16¢/ 21¢ that they charge prisoners is done for no other reason than to create a profit and fund pet projects of the director and department. During the 9 years that I have been incarcerated I and my family have spent approx \$50,000.00 on phone calls. Phone calls have been my primary link to family and friends. Especially in light of the fact that I have been housed on average 150 miles away from my family and friends. And recently with the passing of my mother the maintaining of contact with my family is increasingly vital. Even moreso for my father, who will turn 81 later this year. The cost of my phone calls has at times forced him to choose between his monthly bills, medicine or other necessities needed by the elderly for everyday life.

Also the quality of service given for these exuberant prices is deplorable, calls are dropped with great frequency and for which there is no opportunity for prisoners or their families/friends to be reimbursed. The company does provide a complaint form but the complaint goes unanswered for prisoners and families are entangled in the proverbial system of red tape. Communication with my family is very important considering the fact that most of my family is older and sickly, and are unable to visit so our only form of communication is via the telephone. The fact that the calls cost so much has begun to sever some of my familial ties and life long friendships. PCS and the MDOC, would do prisoners and their family/friends a great service if they would extend their 1 minute one time only call to 5 minutes once a month. It is for the following reasons that I encourage all of those who have the ability to provide relief to prisoners and their families to do so. For such relief would go a long way in keeping prisoners and their loved ones with the support necessary to make it through this journey called life.

Thank you for your time and attention to this matter.

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Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Torrance A. Graham Sr.", written in a cursive style.

Torrance A. Graham Sr. #507300  
Lakeland Correctional Facility  
141 First Street  
Coldwater, MI 49036

MAR 26 2013

FCC Mail Room

Dear Secretary Dortch,

This is a public comment for WC Docket number 12-375 —

I've been incarcerated in the Virginia prison system for 13 yrs. I was in the Navy when I got into trouble. Already away from family in Georgia. Being incarcerated so far from home makes it too difficult for my elderly grandmother, who raised me, to come and visit.

The bulk of our contact is through the phone. And because of sky-high phone rates that contact has been kept to a minimum. PLEASE, end the abusively high phone rates today! I just want to be able to ask my grandmother about her day. Thank you.

Sincerely,

Baron Goldsberry # 1120006

Bland Correctional Center

256 Bland Farm Rd.

Bland, VA 24315

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MAR 26 2013

FCC Mail Room

Reginald Johnson  
Reginald Johnson

DT-9340

S.E.L. Huntington  
1100 Pike Street  
Huntington, PA 16654-1112

March 19, 2013  
March 19, 2013

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW; Room TW-B204  
Washington D.C. 20554

Dear Secretary Dortch:

"This is a public comment for Docket  
Number 12-375."

No. of Copies rec'd 0  
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① I've spent thousands of dollar on the prison phone system in just a matter of a year. The rate are too high. Because I experienced a problem with my fiancée and family. I needed to stay in contact in order to positively bring good resolution. thereby thousands of dollars were I say unfairly taken away from me. No monthly bill would have exceeded the cost spent by me, in the presence of the same emergency.

② I've never gotten a kick back for dropped or disconnected calls, basic connection fee here are in the area of \$3.00. Outside of emergencies I can afford to use the prison phone system. My family assists me with the wherewithals in emergencies.

③ "Calls for letters, to put it simply, should be free" with reasonable limitations.

④ Beg your assistance in this matter.

Johnson  
DT-9340