



Clackamas County Sheriff's Office

CRAIG ROBERTS, Sheriff

April 18, 2013

TO: The Federal Communications Commission – FCC

REGARDING: WC Docket No 12-375, FCC 12-167; Federal Communications Commission: Rates for Interstate Inmate Calling Services Comment on Proposed Rule Making

I am writing to you as the Sheriff of a large county in the suburban area of Portland Oregon. Our Sheriff's Office operates a 434 bed jail. Today I am writing to urge the FCC to not impose a rate cap on, or eliminate our ability to receive commissions from the inmate communication system. Doing so would impair our ability to provide a secure environment within our jail, reduce public safety, and impair our county's finances.

The Clackamas County Sheriff's Office supports the principle that phone rates for inmate telephone calls should be reasonable. We know that inmates do better – both while incarcerated and once released – when they can remain in contact with their friends and family members, and hence, we recognize the importance of inmates' communications with the outside. Exorbitant phone rates do help us reach our goals of promoting inmate communications.

At the same time, we assert that prison telephone service is not the same as service offered in the community. Any rule passed to regulate phone call costs must take into consideration the unique nature of corrections and the important need to balance security needs and family contact. The cost structure currently in place in Clackamas County strikes that balance. The proposed \$0.07 per minute cap would drastically impair our ability to keep that balance in place. If such an unreasonable rate cap were imposed it would be detrimental to the security of our facilities and to the lives of our inmates.

The technology that our current inmate telecommunication provider offers has been a tremendous asset to the Clackamas County Sheriff's Office and to many other law-enforcement agencies. One of the great advantages of our current inmate communication system ("ICS") is the ability to monitor and record all calls going into or out of the jail. Subsequently, all of those calls can be quickly and easily shared. Other law enforcement agencies with whom we partner rely heavily upon the technology. As a result, we have been able to drastically improve our ability to increase the security of the facility and to public safety outside of it.

To demonstrate how our jail, outside agencies, and the public have benefitted from the technology offered by our inmate communication system, we highlight the following.

- The recording of all calls and the voice verification that must be completed prior to each has reduced the amount of witness tampering and violations of no-contact orders. When such threatening calls have been placed, the offenders are much more easily prosecuted.
- By monitoring and reviewing phone calls, a "hit" that had been placed on an inmate was successfully averted.
- The ICS has a toll-free PREA hotline. This has been very helpful in reducing violence within our facility.

"Working Together to Make a Difference"

Because of the significant public safety benefits the technology our ICS offers, we are extremely concerned about the proposed rate ceiling. Our view is that it will be terribly detrimental. We will no longer be able to pay for the system we currently have, or, at the very least, we will not have access to all of the features that have proven so helpful in preventing and prosecuting crime.

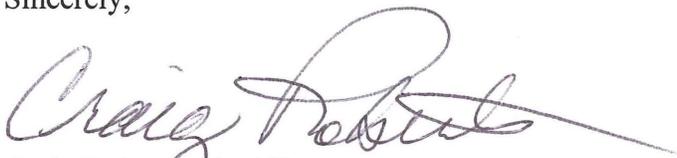
Of primary concern to the Sheriff's Office about the proposed rate cap is that no provider of inmate telecommunication services could offer the types of technological advances and free services that have been so effective in the prevention and prosecution of crimes. Without the technologies to which we have grown accustomed, everyone involved with our detention facilities will suffer in some way. The only ones to benefit are those people involved in criminal activity, as preventing and prosecuting their crimes will become much more difficult.

We also oppose the proposed elimination of commissions to prisons. These revenues are extremely important to us, inasmuch as they are used to pay for programs designed for the inmates' benefits. These programs are aimed at improving the inmates' parenting skills, life-skills, anger management, and earning their GED. Because of the commissions we receive, the costs associated with running these important programs do not come out of the County's general operating fund. I believe eliminating our ability to receive a commission from the inmate telecommunication system would be detrimental to the County and its residents. Indeed such a reduction in our revenues would almost certainly lead a to reduction in the programs offered to the inmates.

We would urge the Commission to not impose a rate cap on, nor eliminate our ability to receive commissions from the inmate communication system.

Thank you for considering my recommendations.

Sincerely,

A handwritten signature in cursive script, appearing to read "Craig Roberts", with a long horizontal flourish extending to the right.

Craig Roberts, Sheriff
Clackamas County Sheriff's Office

cc: Mike Alexander, Captain