

PRISON POLICY INITIATIVE

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

Dear Commissioners and Staff:

We write to provide brief comments to the Commission and to submit a copy of our report released yesterday, “Please Deposit All of Your Money: Kickbacks, Rates, and Hidden Fees in the Prison Phone Industry.”

This report is a follow-up to our September 2012 policy report “The Price to Call Home: State-Sanctioned Monopolization in the Prison Phone Industry,” and to the 36,690 comments submitted with SumOfUs in support of the Wright Petition in November 2012.

This new report is relevant to the Commission’s further inquiry into the prison telephone industry. The report contains extensive updated data regarding the industry, as requested in Paragraph 43 of the Notice of Proposed Rulemaking. In particular, the empirical data contained in the report focus almost exclusively on local jail facilities. We believe it is important to focus on such facilities because telephone contracts for such facilities often have the highest commissions and consequently the highest calling rates.

Additionally, our new report is particularly relevant to a claim made by the Commission in Paragraph 2 of the Notice of Proposed Rule Making. There, the Commission stated that “[d]ebit calling (charges are deducted from an inmate’s account) typically incurs a per-minute charge only.” Our new report includes powerful evidence that this claim is not true. Prepaid and debit calling almost always incurs account-based fee charges. Although this increase in cost may not be reflected in per-minute rates, these fees drive up the *real* cost of prison telephone service.

Our report finds that meaningful regulation of the prison phone industry must stem from a comprehensive analysis of the

customers' whole bills, rather than limiting the discussion to addressing the high per-minute calling rates alone.

Consequently, we respectfully urge the Commission to consider these additional fees when crafting regulation to end profiteering in the prison phone industry.

Respectfully,

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Peter Wagner
Executive Director

A handwritten signature in black ink, appearing to read 'Drew Kukorowski', written in a cursive style.

Drew Kukorowski
Consultant

A handwritten signature in black ink, appearing to read 'Leah Sakala', written in a cursive style.

Leah Sakala
Policy Analyst