



**STATE OF MISSISSIPPI**

DEPARTMENT OF CORRECTIONS

**CHRISTOPHER B. EPPS**  
COMMISSIONER

June 28, 2013

Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Room TW-A325  
Washington DC 20554

**RE: Public Comments for Proposed Rules for GN Docket No. 13-111**

Dear Sirs:

On behalf of the Mississippi Department of Corrections (MDOC), I make the following comments in support of the proposed rules to encourage the development of multiple technological solutions to combat the use of contraband wireless devices in correctional facilities nationwide.

The fight against the proliferation of contraband wireless devices in prisons has been a struggle to say the least. The Mississippi Department of Corrections has been at the front of this fight for several years. MDOC has studied or implemented almost every possible tool that has been proposed to combat this problem. The safety of MDOC employees, inmates and the general public dictate that we do everything possible to control the influx of contraband wireless devices in our prison system. The cornerstone of safety is control. Control over inmate movement, inmate communication and inmate information must be maintained. The introduction of contraband wireless devices threatens that control. Through the use of contraband wireless devices, inmates are able to communicate and organize in a way that threatens public safety.

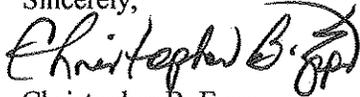
I support the proposed rule to streamline authorization of leases for managed access systems for use in correctional facilities. Mississippi was the first state to utilize a managed access system to control contraband wireless devices. Through a contract with Global Tel\*Link (GTL), MDOC installed a Tecore managed access system at its Parchman facility. MDOC has also installed a managed access system developed by Corrections.Com at the South Mississippi Correctional Institution. MDOC is currently in the process of placing a managed access system at the Central Mississippi Correctional Facility. Obtaining spectrum leases from the commercial wireless network for these systems created significant delays in getting the systems operational. Any measures to streamline the process for authorizing the spectrum leases would be beneficial.

I further support a proposed rule to require wireless providers to terminate service to a contraband wireless device if an authorized correctional facility official notifies the provider of the presence of the contraband wireless device within the correctional facility. MDOC has made efforts to terminate the service of contraband wireless devices by seeking court orders to the wireless service providers to terminate service to specific contraband wireless devices detected to be operating within a correctional facility.

This has been done with the cooperation of the wireless provider. All wireless providers have not been cooperative and MDOC has not pursued a court order against those providers at this time. A rule by the FCC which requires the wireless provider to terminate the service of contraband wireless devices would save time and resources used in obtaining a court order.

As American Correctional Association President, I know that contraband wireless devices are a significant security problem for corrections officials nationwide. I know the stories from corrections executives across the nation of how contraband wireless devices have been used to initiate criminal activity from within the prison walls, to include inmates putting hits out on judges, legislators, correctional officers and others. These proposed rules are absolutely essential to help combat this problem.

Sincerely,



Christopher B. Epps  
Corrections Commissioner  
State of Mississippi

CBE/kg

Cc: David Scott, Special Assistant Attorney General  
File