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By ECFS
Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: *Rates for Interstate Inmate Calling Services*
WC Docket No. 12-375

Dear Ms. Dortch:

On June 26, 2013, the FCC released a public notice requesting additional information regarding “certain fees relating to inmate calling services (ICS).”¹ In particular, the FCC requested additional information regarding “fees that appear ancillary to making calls, such as account setup fees, account replenishment fees, account refund fees, and account inactivity fees.”² The Public Notice indicated that parties submit this information by July 17, 2013.

Previously, undersigned counsel, on behalf of Martha Wright, et al (the “Petitioners”), had submitted information regarding these fees in this proceeding. In particular, comments submitted on March 25, 2013, provided a detailed breakdown of these fees.³ Subsequently, the Prison Policy Initiative published a comprehensive report regarding ancillary fees, and filed it with the FCC in this proceeding on May 9, 2013.⁴

Thus, despite the fact that the ICS providers have declined to provide information previously requested by the FCC, a significant amount of information regarding the ancillary fees charged inmates and their families has already been placed into the docket. However, to ensure that the record is complete, the Petitioners have prepared the attached summaries and are providing the underlying tariffs filed by the ICS providers covering both the interstate charges, as well as the fees that are imposed on intrastate and local calls. While the FCC had requested that this information be provided by the ICS providers themselves, on numerous occasions, the Petitioners wanted to ensure that the FCC has a complete record of the excessive fees that are imposed on inmates and their families before (and after) they call their loved ones.

¹ *More Data Sought on Extra Fees Levied on Inmate Calling Services*, Public Notice, WC Dkt. 12-375, DA 13-1445 (rel. June 16, 2013).

² *Id.*

³ *Comments of Martha Wright, et al.*, submitted March 25, 2013, pg. 24-25, Exhibit H.

⁴ *See Please Deposit All of Your Money: Kickbacks, Rates, and Hidden Fees in the Jail Phone Industry*, filed May 9, 2013, <http://apps.fcc.gov/ecfs/comment/view?id=6017338922>.

As should be clear from even a cursory review of the attached information, inmates and their families and friends are charged highly excessive fees, in addition to the outrageous per minute rates documented previously. Simply put, the Ancillary Fee data provided by the Petitioners and other parties in this proceeding establishes, without question, that “charges, practices, classifications, and regulations” of the ICS providers are unjust and unreasonable.

Should there be any questions regarding this submission, please contact undersigned counsel.

Respectfully submitted,



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