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Date: 7/15/136
To: Federal Communications Commission
From: Victor Wanchena, Corrections Security Technology Manager
Re: FCC Proposed Rulemaking GN Docket No. 13–111

The Minnesota Department of Corrections is aware of the problem contraband cell phones pose to the security of correctional facilities. We support the Commission's willingness to investigate the issue and consider proposed rulemaking to address the problem.

Regarding the specific proposals of GN Docket No. 13–111, we offer the following comments:

1. Regarding access to spectrum for managed access systems, we support the proposed rulemaking. These systems are designed solely to control access to cellular systems. Any simplification of the licensing process speeds deployment, and ultimately has a positive impact on public safety. The proposed process changes are reasonable and acceptable to us.
2. Regarding detection of contraband cell phones, we support the creation of standards for detection equipment. The minimum standards should be enforced as a certification by the Commission. The standards should address: accuracy, sensitivity, what can be detected, operating requirements, and interference with LMR systems. We suggest they detect all communication protocols (voice, text, data), detect active phones (in use), detect inactive phones (powered on in standby mode), be accurate enough to locate a phone to within 1 meter, provide location in 3 three dimensions, and provide no interference to public safety LMR systems.
3. Regarding termination of service to devices identified by correctional officials, we support rulemaking that facilitates a simple process for this. We suggest a nationally standardized protocol for identification of the device, identification of the requesting agency, and process for notifying the carrier. This standardized procedure would require agencies to designate authorized agents for each facility. We suggest a new process be developed because of the unique requirements of the correctional facilities.

4. Regarding other possible rulemaking, we do not support any use of jamming equipment to block cellular communication. While jamming could work for blocking the use of contraband cell phones, the potential problems with jamming outweigh its value.

In conclusion, we thank the Commission for taking action on this matter. We support and streamlining of the licensing process for managed access systems. We also support establishing standard for detection systems and service terminations. We do not support any use of signal jamming.