

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.20554**

NETWORK COMMUNICATIONS INTERNATIONAL CORP. *
(“NCIC”) * GN Docket No. 13-111

In Re: Contraband Wireless devices

COMMENTS ON NOTICE OF PROPOSED RULEMAKING

NOW COMES Network Communications International Corp. (hereinafter “NCIC”) who files these Comments in response to the Commission Notice of Proposed Rulemaking – Contraband Wireless Devices (hereinafter “NPRM”) put forward by the Federal Communication Commission (hereinafter the “FCC”) in this matter.

NCIC is a privately owned inmate service provider with operations in almost every state in the US. NCIC supports the Commission’s proposed rulemaking which would support detection methods of contraband wireless devices to be present within correctional facilities as well as rule modifications requiring CMRS providers be responsible for suspending service to the detected device upon notification from an authorized correctional facility official. However, NCIC proposes alternative, less expensive and time consuming options be considered during this rulemaking process. NCIC also requests that specific regard be given to those in which they deem “authorized” to provide information to CMRS providers. Perhaps

the Inmate Service Provider for the facility, along with authorized staff at the facility be considered “authorized”.

Per the Commission’s request for comments regarding managed access and detection technologies, NCIC responds with the following comments:

NCIC has found Managed-Access Systems to be a cost-prohibitive (about \$1,000,000 in total for the average 500 bed jail) solution for most county and city governments and nearly impossible to manage without hiring an additional full-time employee to run the system. Simply detecting the contraband is only ½ of the solution; requiring staff to physically search and retrieve the contraband presents its own circumstances, thus costing the facility staff time and expense.

Recently, the country of Honduras implemented legislation that required the mobile phone providers to create “Dead Zones” in their own network around prison facilities. By forcing the cellular providers to block the signals from prisons, you eliminate the cost (and tax burden) of purchasing and managing systems within government entities and pass the expense to the handful of CMRS providers in our country. Require the CMRS providers to block the signal at their local tower servicing the particular jail or purchase and manage the Managed-Access Systems, which they could do at a lower cost than each government entity.

Additionally, low-powered jamming technologies from Israel and China have been decreasing in expense and should be permitted for use in jails located in rural areas that are more than a mile from any residential or business areas.

In Conclusion, NCIC fully supports the Commission's proposed rule in establishing a process for eliminating contraband wireless device use within correctional facilities.

Respectfully submitted,

/s/ William L. Pope

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