



August 2, 2013

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

Re: Joint Ex-Parte Comment for CC Docket No. 12-375 ("Wright Petition")

Dear Secretary Dortch:

We are contacting you in reference to CC Docket No. 12-375 (known as the "Wright Petition"). Earlier today, members and allies of the Campaign for Prison Phone Justice met with staff from Commissioner Pai's office to discuss the pending order, (Reforming Rates for Interstate Inmate Calling Services) scheduled for a vote on Friday, August 9th.

In our meeting we were joined by Steven Renderos of the Center for Media Justice, Peter Wagner of Prison Policy Initiative, MA; Talila Lewis of Helping Educate to Advance the Rights of the Deaf (HEARD) Washington DC; Heather Rice-Minus of Prison/Justice Fellowship, Washington DC; and Keith DeBlasio of Advocare, VA.

In brief, participants shared the following:

- Talila Lewis: Unique impact of prison phone rates to prisoners with disabilities, specifically the added cost of connecting a relay operator, and the time differential in speaking vs. signing (for example it takes five times as long to sign as it does to speak) and the prohibitive cost barriers that are uniquely born by the deaf and hard of hearing.
- Heather Rice-Minus: Telephone calls from prison are vital in keeping families together and communities safer. Justice Fellowship and other partners on the right believe phone rate reform will lead to a reduction in recidivism and costs related to incarceration.
- Keith DeBlasio: Prison phone reform is central to criminal justice reform. In Virginia, there is support for the FCC's role in rate reduction from the state's Department of Corrections and among state legislators.
- Peter Wagner: The FCC should apply the same benchmark rate to both jails and prisons. He noted that the Federal Bureau of Prisons cites a profitable rate of .20/min and any benchmark higher than that would be "unreasonable" because it would eliminate the incentive for companies to further control costs.

Of particular note are two points of advocacy related to the question of rate regulation in jails, and the unique concerns of the Deaf and Hard of Hearing Community.

Jails vs. Prisons

Per the question of jail and prison regulation parity, Prison Policy Initiative share the following:

- Whether jails or prisons—a comprehensive approach to addressing the exorbitant costs necessarily includes addressing the commission payments
- Though ICS have tried to make the argument that jails and prisons should be treated differently (claiming its more expensive to operate in jails), no companies to have submitted data to justify this claim, with the very recent exception of Century Link who filed an ex parte ([Ex Parte filed by Century Link August 2, 2013](#)) which shared some comparative cost data and noted the differences were marginal.
- Many companies and sheriffs associations have made small jails, with fewer inmates, the focus of their argument for why jails should be treated differently. Mr. Wagner points out that the jails with 15 people or less is a tiny percentage of the overall prison and jail population. The bulk of the business for prison telephone operators is coming from larger facilities. Mr. Wagner submitted data related to the comparison of prisons and jails [in comments filed July 17, 2013](#).
- The FCC should do what it can to address the issues related to fees, which are profit driven and often have no relation to the cost of service. These fees are in addition to per-minute charges and do not contribute to the phone companies 'commissions payment' obligations to state and local agencies.

Deaf and Hard of Hearing

Per the unique needs of the deaf and hard of hearing community, HEARD shared the following information from their attached, previous filing:

Re: Length of time it takes to connect to a relay operator

The discussion related to length of time to connect to the relay operator can be found on page 5. The prisoner explains how this process takes "at least 5-8 minutes"

To start with here at [name of Florida facility deleted to protect the prisoner] they have their phone set up with a 15-minute time limit. This timer starts the second you pick up the phone and dial your number. You first have to call Florida relay operator at 1 800-955-8771. We have a 501 # number that forwards us to the 800 number listed above.

Once we reached the relay operator at that point we give the number that we are calling. Once we give the number to be dialed the relay operator puts us on hold to verify if the number you are dialing is set up to allow collect calls. Once the relay operator verifies that collect calls can be made to the number you are calling, the relay operator comes back online and tells you that collect calls can be made to that number and asks what your name is for the collect call. After you give the relay operator your name for the collect call the relay operator put you back on hold once again to see if charges will be accepted by the party at the other end of your call.

This process takes at least 5 to 8 minutes. This time is part of the 15-minute time limit that the Department of Corrections has on their timers for each call. Now keep in mind that a regular call costs a total of about \$2 but the relay service had a \$3.62 hook up fee, then so much per minute after that so you only get 5 to 7 min. and you have to call back and repeat this process.

The same prisoner explains the Deaf prisoner's experience with connecting to relay as follows:

If you are Spanish speaking and/or calling a Spanish-speaking person the way its set up here, you must first call for English-speaking relay then you have to beg, and I mean beg the operator to switch you over to Spanish relay. This takes at least 5 minutes itself, sometimes longer . . . Then once they get the Spanish relay taking 5 min. then they have to complete the whole process outlined [in No. 2] above for English calling parties so the only get about 3 or 4 minutes of calling time before they have to repeat this process to call back.

Footnote 13 on the same page, discusses additional fees being charged to deaf prisoners to connect to relay and the "forced long distance phone calls." It states:

Numerous deaf prisoners and their family members have reported to HEARD that they are being charged an additional fee (sometimes as much as \$8.00) to connect to the relay services from prison. HEARD has provided telephone bills as attachments to this comment. One bill indicates that a nine (9) minute Maryland to Maryland TTY-to-Voice phone call that cost the family member \$20.40. Hearing prisoners at the same facility make free "courtesy calls" to all local numbers. Deaf prisoners have to pay for every phone call they make—even local calls. While this Comment focuses on interstate telephone calls, the Commission should note that family members have been billed for local (intrastate) calls as though these calls are interstate phone calls because many ICSs force prisoners to use a relay services from different states.

Following our testimony we engaged in a brief discussion with Nicholas Degani regarding our collective concerns. Specifically, we restated our desire for interstate and intrastate parity, and our past filings citing a .7 per minute rate.

As sunshine rules go into effect, we urge the FCC--as the only agency with jurisdiction over all call rates--to bring just and reasonable rates to inmate calls at all correctional institutions.

Sincerely,



amalia deloney
Policy Director, Center for Media Justice



March 25, 2013

Marlene H. Dortch, Commission Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-B204
Washington, DC 20554

Re: *In the Matter of Rates for Interstate Inmate Calling Services, WC Docket No. 12-375, Paragraph 42, "Disabilities Access"*

Dear Commissioners:

Helping Educate to Advance the Rights of the Deaf ("HEARD")¹ hereby submits this comment responding to the Commission's request for information² about rates for and access to interstate Inmate Calling Service ("ICS") for deaf³ and disabled prisoners.

Specifically, HEARD submits this comment on behalf of three hundred and seventy-nine men and women in our Deaf & Deaf-Blind Prisoner Database,⁴ their family members, and countless deaf prisoners that we have yet to find in the labyrinth of prisons across this nation.

Meaningful family contact and consistent access to advocates and attorneys is paramount for deaf prisoners who customarily experience continuous discrimination, severe isolation, and horrendous abuse in the prison settings.⁵ Ironically, the expensive and inaccessible telephone systems that exist in prisons across the nation serve as extremely effective barriers to communication for most deaf prisoners.

Deaf, speech impaired, and hearing prisoners with deaf family members endure a greater financial burden with respect to telephone rates than hearing prisoners due to a number of factors, including (1) telephone rates being applied evenly to TTY and regular voice phone calls,

¹ HEARD is an all-volunteer nonprofit organization that advocates on behalf of deaf and deaf-blind prisoners across the nation. HEARD created and maintains the only national database of deaf and deaf-blind prisoners.

² *In the Matter of Rates for Interstate Calling Services, WC Docket. No. 12-375, Notice of Proposed Rulemaking. Paragraph 42, "Disabilities Access."*

³ Historically, "Deaf" has been used to refer to the Culture and Community of Deaf people collectively; while "deaf and hard of hearing" has been used to refer to the level of audiological function and hearing ability by any one individual. However, for the sake of this comment, "deaf" means: individuals with hearing levels that require auxiliary aids or accommodations.

⁴ This number includes four (4) prisoners who are hearing, but only communicate with their family through sign language. See HEARD's Map of Deaf & Deaf Blind Prisoners here: <http://bit.ly/RLySCI>.

⁵ Deaf prisoners experience extreme language deprivation, depressing solitude, and horrendous abuse in prisons. See McCay Vernon. *The Horror of being Deaf and In Prison*, American Annals of the Deaf, Vol. 155, No. 3 (2010).

the former of which is much more time-consuming; (2) failure of ICSs to install videophones, captioned telephones, and hearing aid-compatible telephone equipment; (3) “security” measures that either prevent deaf prisoners from calling relay operators or cause them to incur additional fees by requiring relay services;⁶ and (4) “security” measures that require deaf prisoners to only place collect calls or to only call long distance, even in instances where their hearing counterparts would be able to place a free phone call under the exact same conditions.

In short, ICSs are not providing equal telecommunication access to incarcerated individuals who are deaf, speech impaired, or who use sign language to communicate with their family. Those deaf and signing prisoners who do have telephone access in prison, pay disproportionately higher amounts solely based on their or a loved one’s disability.

SCOPE OF THE PROBLEM

On March 25, 2013, HEARD submitted nineteen (19) public comments from deaf men and women who are incarcerated at eighteen (18) different facilities in the United States. These narratives include copies of countless unresolved grievances about telephone/TTY access, some dating back several years; a TTY print-out that illustrates what deaf prisoners mean when they state that “words on the TTY come through incomprehensibly garbled”; and letters from Culturally Deaf individuals⁷ who make valiant efforts to communicate in English to convey communication access barriers to counselors, correctional officers, wardens, private prison companies, and ICSs alike. Each of these requests were ignored or denied, often without any explanation at all.

HEARD also included shorter statements regarding TTY/TDD access from more than forty prisoners as an attachment to this filing.⁸ Finally, as of March 22, 2013, the Commission had received thirteen public comments from deaf prisoners, three letters from family members and friends of deaf prisoners, and countless comments from Deaf Community members. We have faith that the Commissioners will read each statement to understand the full breadth and scope of the problem, reviewing these prisoners’ recommendations for how the Commission can ensure equal telecommunications access for deaf and hard of hearing prisoners.

Still, for the Commission’s benefit, HEARD selected eighty (80) prisoner surveys at random and assembled prisoners’ responses to two questions regarding telecommunications access at their facilities. These data are provided below.

⁶ Many hard of hearing prisoners could use their own voice and their residual hearing if telephone equipment was compatible with hearing aids or if ICS installed amplified telephones that were, neither of which require a relay telephone call.

⁷ These individuals only communicate in American Sign Language.

⁸ HEARD Public Comment in FCC WC Docket No. 12-35, Attachment A, Statements from Prisoners Regarding Telecommunication Access.

Survey Question No. 1: I have access to a TTY or TDD at my facility?

Response Options	Total No. of Responses
Yes	30
No	28
Sometimes	19
Do not need	1
Do not know	1
No response (individual did not respond to the question)	1

Survey Question No. 2: The TTY/TDD is in good working condition.

Response Options	Total No. of Responses
Yes	15
No	37
Sometimes	16
Do not need	1
Do not know (never gained access)	10
No response (individual did not respond to the question)	1

DISCUSSION

Over the past forty years, Congress has enacted legislation to protect the rights of people with disabilities and to ensure that this population has the same access to programs, activities, services, public facilities and other resources available to the general population.⁹ Regrettably, prisons, private prison companies, prison administrators, correctional officers, wardens, and directors of departments of corrections continue to ignore these laws.¹⁰

HEARD has worked for two years to document and respond to discrimination against deaf prisoners across the nation. Specifically, we have worked to correct and prevent abuse, isolation, and neglect of deaf prisoners. We have written hundreds of letters to correctional officers, unit managers, counselors, case managers, ADA coordinators, wardens, directors of departments of corrections, and legislators about the horrendous conditions of confinement for individuals with sensory disabilities. Yet still, inequities and abuse persist—often worsening after prisoners and advocates report these violations.

Here are issues related to telecommunication access that the Commissioners can consider when drafting regulations to address prisoner telephone rates and access:

⁹ The United States Supreme Court also has found that these laws extend to prisons.

¹⁰ Prisons tend to have policy manuals regarding the standards of procedures for deaf prisoners. These policies are rarely followed or enforced.

1. ASL, not English is the primary language for many deaf people.

Many Americans who grow up deaf use American Sign Language (“ASL”) as their primary or only method of communication. ASL is *not* a manual representation of English. It is its own language with a unique syntax and grammar that does not have a one-to-one correspondence with English. Consequently, many deaf individuals *require* sign language for effective communication, and can only communicate effectively through sign language.

Facial expressions and body language are key to conveying ideas and emotions in ASL, and for many deaf people it is the equivalent of spoken language to a hearing person. One Gallaudet Research Institute study revealed a median Reading Comprehension subtest score for deaf and hard of hearing high school seniors to be around a 4.0 grade level. Yet more research indicates that the average deaf prisoner’s reading comprehension is closer to a 2.0 grade level. While there is variation among members of the Deaf Community, as a whole, the English literacy level is much lower than it is for comparable hearing populations.¹¹

Simply put, the deaf prison population cannot rely on written English as an effective means of communication. Since TTY devices require the user to type out their communication, they prove to be an inadequate and ineffective means for Deaf prisoners to communicate with their families. Moreover, this mode of communication is especially ineffective for deaf prisoners who need to communicate with advocates and attorneys who need to convey complex information with complicated or specialized vocabulary.¹²

FACT: With the current prison telephone system, deaf prisoners in forty-seven states and the Federal Bureau of Prisons cannot communicate with their children or grandchildren if the child signs but cannot yet read.

2. TTY technology is antiquated and outmoded.

Paragraph 42 only mentions the Teletypewriter, or TTY/TDD (hereinafter “TTY”); but the Commission should note that most deaf individuals have long-since abandoned TTY technology for other practical and reliable forms of telecommunication – mainly those that allow communication through ASL.

A 2012 report from the Commission’s own TTY Transition Subgroup of the Emergency Access Advisory Committee indicates that TTY usage is decreasing by about 10% per year, and has cut in half over the past seven years. The same report indicates that TTY relay calls are only 12% of the total relay volume, and that 75% of all accessible calls made in the U.S. are made via videophone. Even still, videophones are installed only in *three* state prison systems – Vermont, Virginia, and Wisconsin.

¹¹ It is important to note that none of this is a reflection of the Deaf individuals’ intelligence or ability to learn. Rather, it is an indication of how difficult the task is to learn the written form of language when a person has little or no access to a spoken form and when the only language that she has accessed since birth is a visual language as opposed to a spoken one.

¹² HEARD invites the Commissioners to review HEARD’s American Sign Language version of this statement to better understand the visual nature of ASL: <http://bit.ly/13uLPXs>.

Having been developed in the 1960's as a basic mode of telecommunication for the deaf, the TTY has inherent limitations. The technology relies on typewritten words and an audio coupler to transmit signals to an operator or another TTY machine. Most TTYs use a language or "communication code" called Baudot to transmit signals over the phone lines at a speed of 45.5 baud, which is the equivalent of 25 words per minute. No matter how fast a person types, these signals are sent at the rate of 45 characters per minute. As such, conversations via TTY are *at least* four times slower than voice-to-voice conversations. This time estimation does not include the time it takes to connect to the operator. One deaf prisoner takes us through the process to remind us that connecting to the relay operator from prison can easily take at least eight minutes:

To start with here at [name of Florida facility deleted to protect the prisoner] they have their phone set up with a 15 minute time limit. This timer starts the second you pick up the phone and dial your number. You first have to call Florida relay operator at 1 800-955-8771. We have a 501 # number that forwards us to the 800 number listed above.

Once we reached the relay operator at that point we give the number that we are calling. Once we give the number to be dialed the relay operator puts us on hold to verify if the number you are dialing is set up to allow collect calls. Once the relay operator verifies that collect calls can be made to the number you are calling, the relay operator comes back online and tells you that collect calls can be made to that number and asks what your name is for the collect call. After you give the relay operator your name for the collect call the relay operator put you back on hold once again to see if charges will be accepted by the party at the other end of your call.

This process takes at least 5 to 8 minutes. This time is part of the 15 minute time limit that the Department of Corrections has on their timers for each call. Now keep in mind that a regular call costs a total of about \$2 but the relay service had a \$3.62 hook up fee, then so much per minute after that so you only get 5 to 7 min. and you have to call back and repeat this process.¹³

3. TTY technology is incompatible with modern telecommunication technology.

TTYs cannot connect to videophones.¹⁴ As previously stated, since most deaf people do not have TTYs in their homes, deaf prisoners with deaf family members cannot enjoy communication with family members. Some ICSs do allow TTY-to-TTY connections. However,

¹³ Numerous deaf prisoners and their family members have reported to HEARD that they are being charged an additional fee (sometimes as much as \$8.00) to connect to the relay services from prison. HEARD has provided telephone bills as attachments to this comment. One bill indicates that a nine (9) minute Maryland to Maryland TTY-to-Voice phone call that cost the family member \$20.40. Hearing prisoners at the same facility make free "courtesy calls" to all local numbers. Deaf prisoners have to pay for every phone call they make—even local calls. **While this Comment focuses on interstate telephone calls, the Commission should note that family members have been billed for local (intrastate) calls as though these calls are interstate phone calls because many ICSs force prisoners to use a relay services from different states.** See HEARD Public Comment in FCC WC Docket No. 12-35, Attachment C.

¹⁴ In a different Commission docket, the Commission decided that TTY-to-Videophone calls are illegal "double-billed" calls, so there currently exist no means of connecting the old (TTY) and new (videophone) technology.

since these calls take at least eight times longer than voice phone calls, and the charges are not reduced (in many cases they are more expensive), they also are cost prohibitive for most every family member.

FACT: Culturally Deaf District of Columbia prisoners are housed in federal prisons as far as Arizona, California & Florida. These prisoners have the support of signing family members, signing advocates, and signing attorneys. Since NO Federal Bureau of Prisons facility has installed a videophone, we cannot communicate with them.

4. Videophones are the preferred method of communication in the Deaf Community.

Videophones and captioned telephones are the better telecommunication option for many deaf people. As previously stated, typewritten communication is not the equivalent of voice communication for individuals who communicate in sign language. Also, prisoners with residual hearing can follow telephone conversations on their own with some assistance of amplifying devices or captioned telephones. With the advent of new technology and relay services, including internet-based relay services and videophone technology that allows sign language users to communicate in their native language, in real-time, most TTY users have migrated to other forms of communication to access the telephone network including text messaging, instant messaging, and video and Internet Protocol-relay.

To ensure equal access to telecommunications, some prison and jail systems have installed videophones for signing prisoners. Many prisons and ICSs use “security” as a justification for not providing videophones in prison (e.g., California, New York, Federal Bureau of Prisons, *inter alia*); but Vermont, Virginia and Wisconsin have proven that “security” and videophone access are not mutually exclusive. Prison facilities in each of these states record videophone and telephone conversations alike.

5. Prisons often limit access to TTYs and telephones.

Many ICSs block toll-free numbers for “security purposes,” thus preventing deaf prisoners from using relay altogether (e.g., Georgia, Maryland, Nevada). In addition, at many prisons, deaf prisoners must file written requests days in advance to use the TTY which is often stored in a counselor’s office (e.g., California, Delaware, Florida, Maryland, Ohio, Federal Bureau of Prisons). In states where rates are cheaper during the evenings and on the weekends, deaf prisoners cannot take advantage of these rates because staff is not present during those times.

6. ICSs utilize voice command phone systems.

Many ICSs utilize voice command phone systems.¹⁵ These systems require callers to *speak* into the phone in order to place a call, and to *hear* numerous prompts. Here again, deaf and speech impaired persons have no option but to rely on hearing prisoners to place a telephone call.

¹⁵ HEARD Public Comment in FCC WC Docket No. 12-35, Attachment B, Global Tel*Link Voice Command Telephone System.

7. Deaf Prisoners who communicate in Spanish are not able to connect to Spanish Relay Service.

Deaf prisoners who are Spanish-speaking or who have Spanish-speaking family members are barred from calling Spanish relay service. Most ICSs only allow deaf prisoners to call one phone number from the TTY. This number is almost always a traditional relay service with English-speaking operators.

For hearing prisoners, the first prompt is to “press 1 for English and 2 for Spanish.” This differs greatly for prisoners who need to use the TTY. One prisoner in Florida explains the dilemma this way:

If you are Spanish speaking and/or calling a Spanish-speaking person the way its set up here, you must first call for English-speaking relay then you have to beg, and I mean beg the operator to switch you over to Spanish relay. This takes at least 5 minutes itself, sometimes longer . . . Then once they get the Spanish relay taking 5 min. then they have to complete the whole process outlined [in No. 2] above for English calling parties so the only get about 3 or 4 minutes of calling time before they have to repeat this process to call back.

Deaf Spanish speakers’ access should be on par with that of hearing Spanish prisoners who have access with the push of a button. Florida has a Florida Spanish Relay Service, so the ICS responsible for providing telecommunications services should ensure that this number is not blocked.

8. Some videophone “security” systems are impractical for signers.

At least one facility with videophones has installed a “security” system that requires the individual who is called to press the record button nearly every thirty seconds. This literally requires the family member, advocate or attorney to sign with one hand while using the other hand to push a button every thirty seconds to ensure that the system is recording. When HEARD interviews prisoners at this facility, we require two volunteers--one presses the record button, while the other communicates in sign with the prisoner. This still does not amount to equal communication access.

Also, some prisons with videophones limit the amount of time that hearing prisoners with deaf family members can use on the videophone. This is unlawful discrimination as well. Hearing prisoners who communicate with deaf family members should have the same amount of time to communicate with their loved ones as deaf prisoners with deaf family members.

Finally, some facilities completely remove the TTY from the facility after installing videophones. Many hard of hearing or late-deafened individuals do not know sign language and may need to or prefer to use the TTY. Thus, TTYs should still be available at prisons with videophones.

IMPACT

Studies demonstrate that incarcerated individuals who maintain contact with family members and the community have fewer infractions in prison (thus improving staff safety), and that they have more success when they return to the community. For parents who are prisoners, the ability to keep in touch with their children means that their children have better outcomes. These studies show a positive correlation between prisoners maintaining contact with their communities and improved public safety. All of this holds true whether the prisoner is hearing or deaf.

In fact, the recidivism rate for deaf prisoners far exceeds that of hearing prisoners in large part because deaf prisoners can rarely fully benefit from the inaccessible programs and services in prisons and on the road to reentry. Inaccessible telecommunication increases the likelihood of recidivism because it weakens prisoners' ties with the community.

Prisons already are exceptionally lonely places for most deaf individuals. In many cases, deaf prisoners have absolutely no communication with prisoners or staff at these facilities.¹⁶ Accessible telecommunication truly is paramount for this population. Blocking access to telecommunication for this group not only further isolates these individuals from their families and the community, but makes them prime targets for abuse.

The current systems places deaf prisoners at even more risk of abuse because staff and prisoners know that they have very little recourse with respect to filing written grievances and obtaining outside support and advocacy.¹⁷ Deaf prisoners *must* have access to effective and affordable telecommunications so they can communicate with advocates and attorneys.

OTHER MINORITY POPULATIONS

The Commission should make note of the absence of comments from numerous minority prison populations, including women, juveniles, detainees, language minorities, and prisoners with physical disabilities. Please ensure that the Commission's regulations safeguard these groups' communication access rights as well.

¹⁶ See Public Comment in FCC WC Docket No. 12-375. Hearing prisoner Larry T. Hill, on behalf of deaf prisoner Eddie Henry states that staff at the facilities cannot communicate with deaf prisoners, that the TTY is never in working order, and asks the FCC not to charge deaf prisoners to use the TTY and to consider replacing the TTY with videophones so deaf prisoners can have accessible communication with their families.

¹⁷ Deaf prisoners are often punished for their failure to obey oral commands, for using sign language to communicate, for failure to follow rules and procedures that were never communicated to them, for missing counts that they were unaware of, and for filing grievances about these persistent inequities. Advocates and attorneys need to be able to communicate in sign language with most of these individuals to assist them with the grievance processes and to provide meaningful support.

RECOMMENDATIONS

For the foregoing reasons, HEARD suggests that the FCC mandate the following:

1. ICSs should be required to install videophones, captioned telephones, and other auxiliary aids for deaf, speech impaired and signing prisoners.
2. ICSs should be required to file with the FCC, rates for prisoners with and without disabilities.
3. All ICSs should be required to assemble and report data regarding the number of phone calls placed using TTYs and videophones.
4. ICSs should file with the FCC, periodic reports regarding *all* telecommunications access grievances filed by prisoners with sensory disabilities.
5. ICSs should reduce the rates charged for videophone and TTY calls to at least one half or one quarter, respectively, the charges for voice calls.
6. ICSs and prisons should extend limits on telephone calls for deaf and hearing prisoners who use videophones or TTYs accordingly.
7. All relay numbers, including Spanish relay numbers, should not be blocked and should immediately be added to each ICS's list of approved numbers.
8. No prisoner should pay additional fees to use relay service.

We thank you for the opportunity to comment on calling services for prisoners with disabilities. HEARD also thanks you in advance for your leadership in ensuring that telecommunication service is accessible and affordable for *all* prisoners and their loved ones.

We would be happy to provide more information and you should feel free to contact us if you have any questions regarding HEARD's comment.

Most Grateful,

/s/

Talila A. Lewis, Founder & President

Attachment A

Statements from Deaf Prisoners Regarding Telecommunications Access¹

Can't read. Need videophone.

-Delaware

I am not satisfaction with this. I want equal with all inmates that can make their phone calls at anytime, any day and any weekend/holiday, like they do. Why can't I be alike them?

-Federal Bureau of Prisons

Up untill Securos Phone Comp took over call I didn't have any problems with that TTY phone call and I was never charged for a phone call-Securos got TTY fixed one time-only one number-when through but my people got charged 4 the first time-in all these years-"I ask u why?"!!!

-Florida

can't get through to relay

-Georgia

I'm starting to file [grievance] for Video Phone soon.

-Federal Bureau of Prisons

Garbled all the time

-California

Us deaf or hard of hearing inmates have no cheaper cost to contact our loved ones over well hearing inmates. Cost us \$5 for 20 min. Also because we don't have a direct line for relay system for the collect phones we are forced to go through the social worker just to make phone calls.

-Wisconsin

really need the videophone installation right away before go home!

-New York

They are billing us too much to use the TTY phone.

-Florida

I am working on videophone case at federal civil court

-California

¹ Statements transcribed exactly as written to HEARD unless there are brackets [] to indicate otherwise.

there really need videophone cuz TTY is no longer now.

-Florida

I want to use videophone.

-Florida

can't get through TTY relay system. Since we cannot use TTY relay system, we want to use videophone. (Counselor says it's too expensive)

-Georgia

Deaf prisoners have to pay high collect call bills. No TTY in my dorm.

-Georgia

HELP.

-Florida

Impaired TTY

-Pennsylvania

for grievance for being denied the use of the TTY/TDD phone. Please help to advocate V.P. to my facility because their denies us access to the V.P.

-New York

we can't get through relay system.

-Georgia

This facility is not assessable to the Disabled!

-Illinois

the Warden of [name of facility removed to protect prisoner], don't care about our Rights! Also said go to the court for our Rights problems.

-Maryland

Please help me because I don't know what to do.

-Illinois

Need use videophone

-Georgia

It has not worked for 4 years since Securus phone co took over-call will not go through

-Florida

I complain/need to call parents

-Maryland

haven't been able to communicate by phone for over 8 mos.

-Nevada

in grievance mode at this time

-Oklahoma

Violation of Rights: Lack of adequate TTY. I am being denied access to TTY for the following reasons: [Maryland prison name deleted] has TTY, but that TTY does NOT allowed me to call 1-800-735-2258, which is Maryland Relay Service under the Securus phone system (dialed number restriction). This is a violation of the Americans with Disabilities Act, §504 of the Rehabilitation Act, and the DPSCS handbooks's equal access to programs and services.

-Maryland

Need to install a electric box to power TTY near the Secrus phone Thanks. No power outlet near phone!!!

-Maryland (same prisoner as above)

I want video phone

-Georgia

it has not worked for 4 yrs since Securus phone comp took over-call will not go through

-Florida

garbled all the time

-California

We can't get through to relay

-Georgia

Allow me to use it once, attempted call unsuccessful-unable to get outside line

-Federal Bureau of Prisons

Too many times garbled

-Indiana

I can't get through TTY relay

-Georgia

don't know never used it cause want \$5 for 15 min. out my account

-Wisconsin

Must careful – if more grievance or complaint, then more punishment or transfer me to other facility

-Federal Bureau of Prisons

Don't know Not gained access. been trying over 2 years, still no access this date 2/26/13
-Oklahoma

I try to use the TTY at [Florida prison facility], and I cant never talk too my family because they all have cell phone's the cheap one so I cant talk to them I hope you can help. God Bless
-Florida

[TTY] has been problem, have to repeat the words lots.
-Federal Bureau of Prisons

Filled out to grievance Re: TTY and collect from ICS. They dismiss due to insufficient information when I provide enough information.
-Maryland

Filed grievance because no VP calls from TTY.
-Oregon

Attachment B

Global Tel*Link - Voice Command Telephone Procedures

INMATE V-PIN AND PRIVATE CODE REGISTRATION

Pick up the handset and follow the below steps to register for VPIN and establish your four digit private code.

1. Dial 1 for English or 2 for Spanish.
2. Dial the number 111 to begin registration.
3. Enter your 7 digit SID number.
4. Say your first and last name.
 - Speak directly into the phone.
 - Speak in a clear and natural voice.
 - You will have five seconds to say your name.
5. Please confirm your first and last name by restating them after the tone.
 - Speak directly into the phone.
 - Speak in a clear and natural voice.
 - You will have five seconds to say your name.
6. If your VPIN registration is successful, your name will be repeated back to you
 - If you get a message that your voice did not match, don't hang up. You will be asked restate your name up to three times.
 - If you did not successfully register after your third attempt, you will hear, "your voice or name did not match. Please try your call again. Goodbye." The system will hang up.
7. You will be prompted to register your secure four digit private code on the telephone keypad.
 - You will need to remember this code when making future calls!
 - Please don't share this code with anyone.
8. You will hear "You entered (your private code number). Press 1 to confirm. Otherwise press 2."
 - You will hear, "Your four digit code is registered."
 - If your code becomes compromised, please dial 112 to reset.

DIALING INSTRUCTIONS

1. Pick up phone. For English press 1, for Spanish press 2.
2. For collect calls press 0.
3. To make a debit call press 1.
4. Enter the 10 digit phone number you are attempting to call.
5. Enter your 7 digit SID number.
6. Say your first and last name.
7. Enter your 4 digit private code.

ATTACHMENT C

Nov 27 11:00:15a

Page 2



Bill Date: Nov 7, 2011
Telephone Account: [REDACTED]

Page 4 of 8

Need-to-Know Information (continued)

The Federal Universal Service Charge (FUSC) is a Verizon Wireless charge that is subject to change each calendar quarter based on contribution rates prescribed by the FCC. On October 1, the FUSC changed to 3.42 percent of assessable wireless charges, other than separately billed interstate and international telephony charges. The FUSC on separately billed interstate and international telephony charges changed to 15.3 percent. For more details, please call 1-888-584-1858, Time For A New Phone.

Check out our Online Exclusive FREE phones to add a new device upgrade today. Visit www.verizon.com/resolutions. 2-yr activation or upgrade required.



Questions? Call: (609) 222-0330

This portion of your bill is provided as a service to AT&T.

Miscellaneous Charges and Credits

*Taxes and Surcharges

Description	Amount
1. MD Gross Receipts Tax Surchage	.41

Total Miscellaneous Charges and Credits **\$.41**

Calls from [REDACTED] Relay Calls

*Domestic

Date	Time	Place and Number Called	Type	Rate	Minutes	Amount
2/10/25	9:20pm	VIA RELAY MD [REDACTED]	TBS		9	20.40

For Your Information

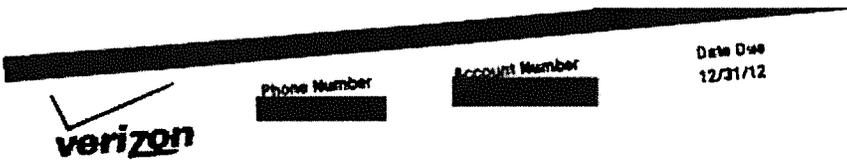
Bankruptcy Information

If you or we were subject to a bankruptcy proceeding, this statement may include amounts for pre-bankruptcy services. Any such pre-bankruptcy balances are for your information only and you should not pay any pre-bankruptcy amounts. Please direct all correspondence concerning bankruptcy to PO Box 3007, Birmingham, AL 35202.

We've updated our Privacy Policy

To read the new policy and a summary of the changes we have made, please visit www.verizon.com/privacy.

ATTACHMENT C



Other Providers

MCI

If you have questions concerning this portion of your bill, please contact MCI at 1-800-VERIZON

Breakdown of Charges

MCI Summary	10.05
Itemized Calls (see Call Detail)	20
MD Gross Receipts Tax Surcharge	\$10.25
Total	

Call Detail

Itemized Calls			Number Called	Type	Rate	Min/Sec	Amount
Date	Time	Place Called					
Domestic:							
Nov 9	7:05PM	JARRETTSVL MD	[REDACTED]	Call		12:00	10.05
Called From		HAGERSTOWN MD	[REDACTED]				\$10.05
Total Calls							