

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of )  
 )  
Rates for Interstate Inmate Calling Services ) WC Docket No. 12-375  
 )  
 )  
\_\_\_\_\_ )

**MOTION FOR EXTENSION OF TIME TO FILE COMMENTS AND REPLY  
COMMENTS**

Pursuant to Section 1.46 of the Commission’s rules, 47 C.F.R. § 1.46, the Ohio Department of Rehabilitation and Correction (“ODRC”) respectfully requests an extension of time for the filing of initial comments and reply comments in the above-captioned proceeding, which is reviewing the rates for inmate calling services (“ICS”) in correctional facilities. By public notice dated November 13, 2013, the Commission announced the date for initial comments to be December 13, 2013, and the date for reply comments to be December 30, 2013. The ODRC respectfully requests an extension of time to file initial comments to January 13, 2014 and reply comments to February 12, 2014. In accordance with the requirements of 47 C.F.R. § 1.46(b), this extension request is being filed 7 days before the current filing deadline. The ODRC also has notified Commission staff that this extension request is being filed.

The ODRC is a state government entity created for the purpose of supervising the orderly administration of correctional facilities in Ohio. The ODRC has implemented rules and procedures that govern inmate access to telephone services and oversees the inmate calling services offered at its correctional facilities. Accordingly, the ODRC has an interest in the proposals set forth in the Commission’s Further Notice of Proposed Rulemaking.

The additional time for commenting as requested herein would allow the ODRC the time necessary to fully evaluate the Commission’s proposals and formulate detailed, fact-specific

comments relevant to the Commission's proposals. As a government organization, there also is a need to circulate proposed comments among various officials and to secure consensus and approval prior to filing. This required administrative process can take place only if adequate time is allowed. This review process is further complicated by staff absences due to the Thanksgiving, Hanukkah, Christmas and New Year holidays.

Further discussion of these important issues will enable the ODRC to provide a more complete factual and legal record in this proceeding. Grant of this modest extension will not cause harm to any interested party.

Accordingly, the public interest would be served by grant of this brief extension.

Respectfully submitted,

**OHIO DEPARTMENT OF  
REHABILITATION & CORRECTION**

*/s/ Ryan G. Dolan*

---

Ryan G. Dolan

Staff Counsel

Ohio Department of Rehabilitation &  
Correction

Division of Legal Services

770 West Broad Street, Second Floor

Columbus, OH 43222

Dated: December 6, 2013