



OFFICE OF THE SHERIFF
FORSYTH COUNTY, NORTH CAROLINA

Sheriff William T. Schatzman



December 9, 2013

The Honorable Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: WC Docket No.: 12-375

Dear Secretary Dortch:

I am the Forsyth County Sheriff. I write concerning the Commission's recent order reforming Inmate Calling Services published on November 13, 2013. This order has great potential to adversely impact my office detention center operations in a number of ways. I reach out to you for your help for this reason.

First, a bit of history may be helpful. Forsyth County's county seat is Winston Salem, the fifth largest city in the state. The cities of Winston Salem, Greensboro and High Point are collectively called the Piedmont Triad and the three together make up the 30th largest metropolitan area in the United States (combined population of approximately 1.6 million). The Forsyth County Sheriff Office has 531 employees and our Detention Center has a housing capacity for 1, 016 inmates.

As you may know, there are significant differences between jails and prisons. Jails are operated by local governments and are designed to house inmates awaiting trial or serving a

Marlene H. Dortch, Secretary
December 9, 2013
page two

short sentence. Prisons are not. Prisons are for the long term, convicted criminals and are operated by State or Federal government.

As Sheriff of Forsyth County, I am very concerned about operations in my detention center and the safety and security of the citizens of my county. The recent decision by the Federal Communications Commission, #12-375, as you know, establishes caps on interstate inmate calling services. The problem here is that the Rule fails to take into account the costs incurred by our detention facility, as well as other local jurisdictions, in providing inmate calling services. You see, the rate cap eliminates the ability of Forsyth County to recover costs of administering services. The result here will likely become the elimination of inmate telephone privileges or a substantial limitation of this privilege.

The new rule, limiting call blocking, compromises the security of our facility and safety of citizens. Under the new rule it would be possible for an inmate to contact the victim of the crime for purposes of intimidation; to coordinate escape plans; to coordinate or continue a criminal enterprise from within the facility by calling outside parties that have masked their identity and location, and so on. Our phone system is an essential component of our detention facility and "call blocking" is an essential feature of the phone system. It is my hope you can appreciate that local detention facilities need to be examined as "local" and not on the same review standard as a "State" or Federal operations.

Many hours are expended by my Detention Officers in maintaining our phone system. Daily duties may include initiating "pin" numbers for all admissions, securing data requested by

Marlene H. Dortch, Secretary
December 9, 2013
page three

outside agencies, maintenance hours spent by staff within the facility, monitoring calls in the facility for security purposes, and blocking numbers for citizen safety concerns. All these duties impact the phone system. A substantial amount of time is expended by staff to insure the efficient operation of our phone system.

It bears repeating that the current rule makes no provision for local detention facilities to recover inherent costs associated with providing inmate calling services. Our detention facility must be allowed to recover our costs for this service or there may soon come a time where we are no longer able to provide any inmate calling service here. It is my sincere hope and plea that the FCC Order be stayed for jails until such time as these concerns can be addressed.

Sincerely yours,



William T. Schatzman
Sheriff

WTS/la