



Arkansas Department of Correction

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January 13, 2014

Secretary Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: Public Comment on WC Docket 12-375, Report and Order and Further Notice of Proposed Rulemaking

Dear Secretary Dortch:

The Arkansas Department of Correction (ADC) provides the following comments in response to the above-referenced Docket concerning Interstate Inmate Calling Services. The ADC has contracted with Global-Tel-Link, Inc. to provide inmate calling services and ADC receives a commission which may change shortly as the inmate phone service is currently up for bid.

The ADC's primary mission is to protect public safety and to provide a safe, humane environment for staff and inmates. The monies received from our telephone provider are used in a variety of ways to further our mission:

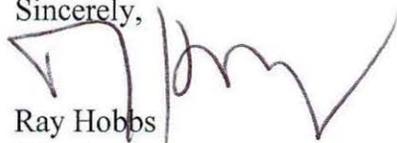
1. Inmate Gate Checks upon an inmate's release or parole from prison;
2. Purchase of computers to provide more efficient medical care, grievance processing, security controls, and back up source for camera images of inmate disturbances and the like;
3. Purchase of medical equipment and mental health programing materials as needs arise after the budget has been set;
4. Sublethal munitions permits control of inmate incidents without the use of physical force;
5. Cameras to assist in reducing "blind spots" and thereby helping to prevent the possibility of rape and sexual abuse incidents covered by the Prison Rape Elimination Act (PREA).
6. Radios and metal detectors to ensure rapid response in emergency situations and to contain the introduction/possession of contraband.
7. Various construction projects aimed at providing inmates and staff with a sanitary, safe environment as well as facilities to ensure ADC staff is well-trained and knowledgeable to fulfill its mission.

Obviously, a prison telephone system must be safe and secure while offering inmates the opportunity to stay connected with friends and family. All calls, except those that are privileged, are monitored to reduce criminal and gang related activity from within and without the prison walls, the introduction of contraband, as well as to contain other public safety issues. This requires staff to monitor the phones who are highly trained in gathering and sharing intelligence to prevent and abate endangerment to the inmates, staff and the public at large. The costs of training and manpower to monitor the inmate calling service is over and above the cost of the hardware and must be factored into the cost of each call. The "safe harbor" rates delineated by the FCC do not take these factors into consideration and, as such, ignores the need to fund these essential services. In its Report and Order, the FCC cites use of telephone commissions for "non-inmate needs" such as employee's salaries and training as a rationale for the severe reduction in the per-minute rate per phone call. On the contrary, staff and equipment are the mainstays of the prison and serve the obvious inmate "need" to be safe and secure in a humane environment.

The ADC, like most of its counterparts throughout the country, operates on a very stringent budget. Asking inmates who utilize the calling services to help pay for the very service they use is not unconscionable by any stretch. To be sure, the maintenance of a safe and secure environment is paramount to the ADC and the availability of phone commissions is essential to meet that goal. Surely, recidivism is reduced by not only allowing inmates to call friends and family, but also the provision of quality of life projects such as those outlined above. In today's current fiscal environment, it is a faulty presumption to assume that the taxpayers will make up the difference if telephone commissions are reduced or eliminated.

If you have any questions or concerns about the above, please contact me at (870)267-6200.

Sincerely,



Ray Hobbs
Director