

MAR 25 2014

From: Greg Sullivan <greg@ilsheriff.org>
Sent: Monday, December 09, 2013 2:46 PM
To: Tom Wheeler
Subject: FCC Report and Order and Further Notice of Proposed Rulemaking on Rates for Interstate Inmate Calling Services (WC Docket No. 12-375)

Federal Communications Commission
Office of the Secretary

Sheriffs across Illinois have seen significant cuts over the last 5 years in their operating budgets. This measure will cripple the Sheriffs in delivering the services necessary to provide inmate phone services that protect the victims and the public at large.

The FCC Order mandates a "one-size-fits-all" approach to regulating inmate calling services for both prisons and jails. The Order fails to take into account the unique challenges inherent in providing calling services to the majority of the nation's jails that are small in size and have high turnover of inmate populations weekly. Inmate calling systems are built to the unique needs of each jail and provide a variety of important safety and security components. The Order disregards this reality and creates a regulatory environment that jeopardizes these services. Many jails may be forced to severely limit or eliminate inmate calling privileges.

The FCC has recognized in its Order that jails incur real costs to administer inmate calling services; however, the rates set by the FCC eliminate commissions to jails on inter-state calls and do not include any allowance for cost recovery for jails. A STAY must be granted for jails until such time as the FCC and Sheriffs can determine a proper method for jails to recover these costs. Because Sheriff's Office budgets are already set for 2014, many Sheriffs will not have the financial resources necessary to continue to administer inmate calling services and perform the vital security functions required to protect the public.

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