

MAR 25 2014

**From:** Cole, David <coledv@co.steuben.ny.us> Federal Communications Commission  
**Sent:** Tuesday, December 10, 2013 2:25 PM Office of the Secretary  
**To:** Tom Wheeler  
**Subject:** FCC Notice of Proposed Rulemaking on Rates for Interstate Inmate Calling Services

I am concerned on the anticipated FCC rulemaking for Interstate Inmate Calling Services (WC Docket No. 12-375) scheduled for 2/11/2014. The FCC Order mandates a "one-size-fits-all" approach to regulating inmate calling services for jails. Seemingly the order does not focus on the distinctive challenges inherent in providing calling services for smaller county jails that experience high turnover of inmate populations daily and 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 services. The actions may force jails to severely limit inmate calling privileges. Our county jail does experience real costs in administering these services and the rates set by the FCC eliminate commissions to jails on inter-state calls and do not include any allowance for cost recovery. Costs recovered by us for inmate telephone services are turned over to the county government as a revenue to offset those costs.

I would respectfully advocate for a STAY ORDER for jails until such time as the FCC and Sheriffs' can determine a proper method for counties to recover costs. Because Sheriff's Office budgets are already set for 2014 by the respective county governments, 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 if this Order goes into effect as scheduled..

David Cole, Sheriff  
Steuben County Sheriff's Office  
7707 Rumsey St Ext  
Bath NY 14810  
Phone: (607) 622-3901  
Fax: (607) 776-7671

This email, and any attachments to it, is confidential and may be legally privileged. It is intended for use by the individual or entity named on the email. If the reader of this email is not the intended recipient, or employee or agent responsible for delivery to the intended recipient, you must not read, use, copy or disseminate the information. Any unauthorized use is strictly prohibited.

If you have received this communication in error, please delete and destroy this communication immediately and notify the sender by "reply" or phone of the error. No responsibility is accepted by Steuben County for any loss or damage arising in any way from receipt of this message.

No. of Copies rec'd \_\_\_\_\_  
List ABOVE \_\_\_\_\_