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**VIA ECFS**

EX PARTE

September 19, 2014

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

Re: *Rates for Interstate Inmate Calling Service*, WC Docket No. 12-375

Dear Ms. Dortch:

The Commission is presently considering whether to adopt additional reforms of interstate and intrastate inmate calling service rates, ancillary fees charged by carriers, and site commissions required by correctional institutions. During this proceeding, CenturyLink has observed that meaningful reform should accommodate the legitimate concerns of all stakeholders, including inmate families, correctional facilities, the public and ICS providers. Although CenturyLink recognizes the impact that commissions have had on inmate calling rates and fees, it believes the Commission should recognize that correctional facilities do incur real and significant administrative and security costs in making inmate calling services available.

To assist the Commission in evaluating the administrative and security costs that correctional facilities incur, CenturyLink has prepared Attachment A, which is a list of administrative and security functions associated with inmate calling services that correctional facilities commonly perform. This list is intended to be illustrative but is not exhaustive, and there are other functions that correctional facilities perform that are not captured on this list. This list is based on CenturyLink's experience as a telecommunications carrier that supports inmate calling services at a variety of facilities nationwide.

CenturyLink has also prepared an analysis of the estimated cost of monitoring inmate calls. Call monitoring is one of the most widespread security measures that correctional facilities use to maintain security when inmates are allowed to place calls. Call monitoring involves listening to and analyzing live or previously-recorded call sessions.

CenturyLink estimates that to monitor just ten percent of the calls placed by inmates at either a prison or a jail would cost the facility 5.28 cents per minute applied to all calls placed by inmates at the facility. To assist the Commission, CenturyLink is providing an analysis, attached as Attachment B, that explains this cost estimate. Actual levels of call monitoring naturally will vary among institutions and even within inmate populations. We also note that for security reasons, correctional institutions typically do not disclose their monitoring procedures.

To estimate the cost of monitoring inmate calls, CenturyLink first estimated the amount of time an analyst hired for the task would actually spend listening to inmate telephone conversations. CenturyLink estimated that a full-time Analyst would spend 143.73 hours per month devoted to this task, after taking into account such things as escalations of security incidents, break time, and other off-time. This number is multiplied by sixty to convert it to minutes. To determine how many minutes could be monitored by an Analyst in any given period of time, CenturyLink applied a 120% productivity factor to account for efficiencies provided by modern call player technologies, which allow investigators to increase the speed of playback and enter notes directly into the player as the investigator analyzes the call.

CenturyLink next estimated the annual cost per employee of salary, payroll taxes and benefits for both an Analyst who would monitor calls and a Supervisor. CenturyLink estimated the annual cost of an Analyst at \$56,620 and the annual cost of a Supervisor at \$89,695. CenturyLink also used a standard management ratio of one supervisor per ten analysts.

Finally, CenturyLink calculated the per-minute cost of monitoring 10% of the calls at a facility using representative call volumes for both a state correctional facility and a county facility. Based on this analysis, CenturyLink estimates that it would cost approximately 5.28 cents per minute applied to all calls placed just to cover the costs of monitoring ten percent of those calls. Attachment B provides more detail concerning how this estimate was properly calculated.

This analysis focuses solely on call monitoring, and it conservatively presumes that all monitoring is recorded, where productivity efficiencies could be realized, rather than live. Nevertheless, this analysis helps illustrate a key cost that correctional facilities incur in allowing inmate calling – a cost that is directly tied to the availability, volume, and duration of inmate calling. A failure to account for such costs in Commission reform would likely lead to reduced access to inmate calling.

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Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this letter is being filed in the appropriate docket.

Sincerely,

/s/ Thomas M. Dethlefs

Copy via email to:

Kalpak Gude  
David Zesiger  
Rhonda Lien  
Lynne Engledow  
Rebekah Goodheart