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November 21, 2014

Via ECFS

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

**Re: *Ex Parte* Communication
WC Docket No. 12-375; Inmate Calling Services**

Dear Ms. Dortch:

On November 19, 2014, Breanna Bock-Nielsen of the National Sheriffs' Association (NSA) and the undersigned met with members of the Wireline Competition Bureau Pricing Policy Division (WCB PPD) to discuss a survey conducted by NSA of its members to determine the cost of officers' time to perform security and administrative functions necessary to allow inmate calling services (ICS) in jails. Lynne Engledow, Pam Arluk, David Zesiger and Rhonda Lien of the WCB PPD participated in the meeting. The points discussed in connection with the NSA survey are detailed in the attachment to this *ex parte*. In addition, NSA stated that it is concerned that the adoption of a single ICS rate for all ICS providers will result in ICS providers refusing to provide service in smaller facilities and jails.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS. If you have any questions, please do not hesitate to contact the undersigned.

Respectfully submitted,

/s/ Mary J. Sisak

cc: Lynne Engledow
Pam Arluk
David Zesiger
Rhonda Lien

Cost to Sheriffs Associated with Inmate Calling Services

1. NSA conducted a survey of its members to determine the cost of officers' time to perform security and administrative functions necessary to allow inmate calling services (ICS) in jails.
2. NSA seeks to present a per minute cost for facilities based on the average daily population (ADP) for facilities with 1-99 ADP; 100-349 ADP; 350-999 ADP and 1000 + ADP.
3. Survey requested information on the time spent on monitoring and security tasks (call monitoring, responding to ICS system alerts, responding to law enforcement, requests for records/recordings, call recording analysis, enrolling inmates for voice biometrics) and administrative tasks (system administration, answering questions from public, answering questions from inmates, blocking and unblocking numbers, escorts for phone repairs and educating inmates on the use of ICS).
4. Survey requested information on the average wage and average annual benefits associated with the officer and supervisor positions that perform the monitoring/security tasks and administrative tasks.
5. Survey requested three months of minutes of use (MOU) data for the reporting facility to determine an average MOU for the facility.
6. Preliminary results show costs to jails are significant. Inmate calling services are a discretionary service allowed for the benefit of inmates and their families. If jails are not permitted to recover their costs, then some Sheriffs may significantly limit or eliminate altogether access to inmate phones in their jails.
7. A one size fits all approach will not allow for adequate compensation for Sheriffs. Facilities with smaller ADP generally have a higher per minute cost. However, wages and benefits are not uniform among states or among facilities within the state. Also, facilities with the same ADP have different average minutes of use. These differences affect the per-minute cost for a facility.