



July 31, 2015

The Honorable Tom Wheeler, Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Comment for WC Docket 12-375

Dear Chairman Wheeler:

The Illinois Campaign for Prison Phone Justice, a project of the Urbana-Champaign Independent Media Center, appreciates the opportunity to submit comments to the FCC's *Second Further Notice of Proposed Rulemaking* (WC Docket No. 12-375; Inmate Calling Services). We are located in Champaign County, Illinois, two hours south of Chicago, and home to the University of Illinois at Urbana-Champaign. We believe we are an excellent example of a county where for ten years we have provided inexpensive and efficient phone services at a small-sized jail (the daily population is approximately 200 people) **without collecting commissions**.

Our story refutes the argument made by the National Sheriffs' Association for a tiered system, claiming that small jails have greater costs related to phone services. Not only have we maintained low rates in Champaign County, but recently the option of remote video visitations has been added at the jail. As we advocated in a January 9, 2015 FCC submission, there is no reason for providers to offer these enticing commissions.

In 2005, responding to community concern, the Champaign County Sheriff's Office renegotiated the existing phone contract with Evercom (later Securus). Previously, the agreement included commissions of \$14,000 a month, which over a two-year period had totaled \$350,000. The new contract included **NO commissions** and rates were set at \$.17 a minute for all calls, pre-paid and collect. Over ten years, these rates have not increased.

When the Sheriff released an open bidding process for a video visitation system to complement the phone system, he continued to honor his commitment to keep rates low and refuse commissions. In October 2013, he signed an agreement with Inmate Calling Solutions (ICS) to take over phone services, add video kiosks, as well as voice mail, email, and photo printouts. The phone rates remained the same at \$.17 a minute, again with **NO commissions**.

We are grateful to share with you our experience of a small Midwestern city that has been able to safely and efficiently offer affordable phone services to families who have a loved one in the jail.

Thank you,

Brian Dolinar, Ph.D.
Illinois Campaign for Prison Phone Justice