Dear Chairman Wheeler,

I am writing today to urge you to continue working towards establishing prison phone reform that will have long-lasting effects on the ICS marketplace.

When the Commission released an ICS fact sheet on September 30, 2015, I was extremely pleased to see that caps on rates and fees were two pillars of the draft language. Over the last 15 years, inmates across the United States have had their communication with loved ones limited by phone rates that far exceeded those paid by the average American. Meaningful reform of the ICS marketplace is long overdue and the Commission should be applauded for taking up this important issue.

That said, it was confusing and disconcerting to find that commissions were not addressed as part of the reform language. As the record shows, and Commissioner Clyburn so aptly stated in her interview with News One, commissions are at the heart of the problem of high prison phone rates. Facilities across this country claim that their commissions are required to support the administration of prisons and jails, but important stakeholders, including inmate advocacy groups and service providers, agree. Commissions are just an unnecessary cost that is ultimately passed on to inmates and their families.

The record suggests that the FCC has clear jurisdiction over commissions under Section 201(b) of the Communications Act of 1934 and by addressing this important issue, the FCC will establish a series of reforms that bring low rates, limit fees, and ultimately establish a new marketplace where inmates, service providers, and facilities can all find a common ground.

I urge the FCC to bring together all stakeholders in this debate in a roundtable meeting, soliciting comments, cost studies, and other valuable information from interested parties to reach a consensus that allows any reforms to stand for long after the FCC vote on October 22.

Thank you for your work on this important issue.

Sincerely,

William Combs