Dear Chairman Wheeler,

I was extremely pleased to see that caps on rates and fees were two pillars of the draft language of the ICS fact sheet of September 30, 2015. Over the last 15 years, inmates nationwide have borne excessive phone rates far out of step with those of other Americans. Meaningful reform of the ICS marketplace is long overdue and the Commission should be applauded for taking up this important issue.

That said, I was disturbed to see that commissions were not addressed as part of the reform language. Commissions are an important part of the problem. Facilities across this country claim that their commissions are required to support the administration of prisons and jails, but most stakeholders agree that 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 the information provided by stakeholders in this important debate 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,

Avery Kolers