October 7, 2015

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:

The Maryland Sheriffs' Association (MSA) represents Maryland's twenty four sheriffs' offices, a number of which manage local jails. The MSA membership supports the comments and reply comments filed by the National Sheriffs' Association in this proceeding, specifically in support of NSA's position that Sheriffs must be allowed to recover their costs if ICS services are to continue to be widely available in jails.

Inmate calling is a discretionary service in our jails and it is allowed for the benefit of inmates and their families. If Sheriff and County governments are not permitted to recover the costs associated with the provision of Inmate Calling Service (ICS), then they may be forced to significantly limit or eliminate altogether access to inmate phones in the jail(s). Denying payments to jails or restricting such payments to levels that do not at least cover costs will have the effect of reducing the ability to continue to allow ICS in this manner. This will be detrimental to the relationship between inmates and the government as well as with the community.

Local government budgets in Maryland have not kept pace with the costs of operating in detention centers. In addition to security and administrative functions that must be maintained, there are programs for inmates that sheriffs and local governments are required to maintain by law. If the cost of allowing ICS must compete with all other budget needs, it may not be funded. However, if the cost of allowing ICS has its own source of funding, it is less likely to be impacted by the budget process.
Accordingly, Sheriffs incur significant costs in allowing ICS in jails and Sheriffs must be allowed to recover their costs to be able to continue to allow ICS. Please have the Commission to take these factors into account when making its rulings in this matter. Thank you.

Sincerely,

Karen J. Kruger (sm)
Executive Director and General Counsel