

**Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In re:)
) **Public Notice #342689**
#Solutions 2020 Call to Action Plan)

**COMMENTS ON
DRAFT #SOLUTIONS2020 ACTION PLAN**

The Wright Petitioners,¹ Prison Policy Initiative, New Jersey Advocates for Immigrant Detainees, and United Church of Christ, OC Inc. (collectively, the "ICS Advocates"), hereby respond to the above-referenced Public Notice and submit these Comments on the Draft *#Solutions2020* Action Plan released on December 19, 2016 (the "Action Plan"). While the Public Notice sought comment on a number of issues discussed in the Action Plan, these comments are limited to those raised therein regarding the Comprehensive Reform of Inmate Calling Services ("ICS").

In particular, the ICS Advocates have long-supported the Action Plan's call for the development of "real competition" and "reasonable rates in ICS and video visitation services," as well as the abolishment of "kickbacks to correctional facilities."² Moreover, the ICS Advocates applaud the Action Plan's recognition that any rule changes adopted with regard to contraband cell phones should be mindful of the imposition of additional costs on inmates and their families.

¹ The Wright Petitioners are: Dorothy Wade, Annette Wade, Ethel Peoples, Laurie Nelson, Winston Bliss, Sheila Taylor, Katharine Goray, Ulandis Forte, Charles Wade, Earl Peoples, Darrell Nelson, Melvin Taylor, Jackie Lucas, Peter Bliss, David Hernandez, Lisa Hernandez, Vendella F. Oura, along with The D.C. Prisoners' Legal Services Project, and Citizens United for Rehabilitation of Errants. Martha Wright, the grandmother of Ulandis Forte, passed away on January 18, 2015.

² See *Action Plan*, pg. 2.

As set forth below, the ICS Advocates are supplying information regarding the current state of the ICS industry with respect to the rates charged by ICS providers. This information was gathered by undersigned counsel and Prison Policy Initiative staff in late 2016 from publically-available rate information supplied by the ICS providers.

The ICS Advocates are also providing additional information regarding efforts to confront the serious issue of contraband cellphones. Specifically, included in these comments are studies discussing the connection between the recent efforts to reduce ICS phone rates and the reduction in confiscations of contraband cellphones, as well as case studies of past implementations of costly Managed Access Systems ("MAS") which raise serious doubts whether the cost of such systems (which is passed on to inmates and their families and/or taxpayers in general) are sufficiently outweighed by the benefits these systems provide.

I. BACKGROUND

The Wright Petitioners have been actively seeking ICS reform before the Federal Communications Commission since 2002. While their interest originated in a desire to terminate exclusive contracts between private correctional authorities and ICS providers,³ when the Commission expressed its reluctance to intercede, the Wright Petitioners sought comprehensive reform for ICS rates in 2007.⁴ Since the submission of the Alternative Proposal, the ICS industry has undergone tremendous changes.

³ See *Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, Petition of Martha Wright et al. for Rulemaking or, in the Alternative, Petition to Address Referral Issues in Pending Rulemaking*, CC Docket No. 96-128 (filed Nov. 3, 2003) ("Wright Petition").

⁴ See *Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, Petitioners' Alternative Rulemaking Proposal*, CC Docket No. 96-128 (filed Mar. 1, 2007) ("Alternative Petition").

Gone are the dominant incumbent local exchange carriers. With the exception of CenturyLink, no incumbent LEC provides ICS to the public. Now, the marketplace is dominated by a small number of companies, each vying to becoming a "one-stop shop" for correctional authorities. These companies route all communications (i.e., phone, video, email) to their centralized call centers, whereby the security measures requested by correctional authorities are imposed, and then are passed onto the recipients.

As a result, even if a communication is local in nature, the ICS provider routes the communication to its centralized location (in most cases, out of state) before delivering it across the street. As the ICS Advocates conclusively demonstrated in WC Docket 12-375, this consolidation among the ICS providers, along with rapid technological changes, have led to a steep decline in the cost to provide ICS to the public.

The Action Plan highlights two issues that have yet to be resolved with finality – establishing reasonable rates and charges for ICS communications (phone and video visitation) and introducing competition into the ICS marketplace. Also addressed are the "kickbacks" that ICS providers voluntarily agree to pay to correctional authorities in order to secure monopoly control over all inmate communications at a particular correctional facility, including visitations involving the families of inmates.

As discussed below, because certain ICS providers have obtained a court-ordered stay of the rules that would have capped intrastate ICS rates, several ICS providers are charging substantially higher intrastate ICS rates than what they charge for interstate ICS rates.⁵ These rates were adjusted by ICS providers after the FCC's October 2015 Second Report and Order in WC Docket 12-375 so to ensure that the ICS provider and correctional

⁵ See *Securus Technologies Inc. v. FCC*, No. 16-1321 (D.C. Cir. Nov. 2, 2016).

facility "remain whole."⁶ The result is that some ICS providers charge \$10 - \$15 more to make an ICS call across the street than they charge for a call between Alaska and Florida.

Finally, with respect to the serious security issues arising from the use of contraband cell phones in correctional facilities, the Wright Petitioners have previously expressed a concern regarding the possibility that the cost of high-priced surveillance systems may be passed onto inmates and their families through higher ICS rates and fees. The Wright Petitioners have also urged the Commission to adopt policies to protect non-offending inmates and their families from such costs, especially in light of several less-costly options that would reduce the possibility of introducing contraband cell phones into the correctional facilities.

II. DISCUSSION

A. Ensuring Reasonable Rates and Fees For All ICS Products.

Not surprisingly, the ICS Advocates strongly support the Action Plan's goal of encouraging reasonable rates in ICS phone and video visitation services. The Alternative Proposal submitted in 2007 provided extensive evidence that the cost of providing ICS phone service was no more than 15 cents per minute, even for the smallest of facilities. To ensure that ICS providers would receive just and reasonable compensation, the Alternative Proposal urged the Commission to establish benchmark rates at 21 cents for prepaid and debit interstate ICS phone calls, and 25 cents for interstate collect ICS phone calls. The 2008 Wood Study confirmed that determination.

⁶ See *Opposition to GTL's Petition for Waiver*, dated June 17, 2016, at Appendix B, Appendix C. See also *Wright Petitioners Ex Parte Presentation*, dated July 29, 2016, at Exhibit B.

Subsequent evidence, including ICS contracts that promised site commissions above 50% and ICS rates less than 10 cents conclusively demonstrated that the cost of actually providing ICS to consumers was substantially below those set forth in the Alternative Proposal. As such, the Wright Petitioners urged the Commission in 2013 to establish ICS rates at 7 cents per minute, with no ancillary fees. The 2013 Order established safe-harbor and benchmark ICS rates,⁷ and the 2015 Order eliminated the safe-harbor rate, and established a tiered rate plan depending on the size of the correctional facility.⁸ Subsequently, the 2016 Order on Reconsideration raised the ICS rate caps adopted in 2015 Order to account for the argument made by ICS providers and correctional authorities that it was more costly to serve smaller correctional facilities.⁹

Despite the adoption of ICS rate caps that were well above the demonstrated cost of providing ICS service, both the ICS providers and several correctional authorities appealed the 2015 Order and the 2016 Order on Reconsideration, and they remain pending at this time. Moreover, even though the Commission upwardly adjusted the ICS rate caps in the 2016 Order on Reconsideration, the ICS providers and correctional authorities appealed that decision, and obtained a stay. The most obvious result of the pending appeals of the Commission's efforts to implement comprehensive ICS rate cap reform is that there is now a substantial disparity between the rates that ICS providers are charging for intrastate calls as compared to interstate calls.

⁷ See *Rates for Interstate Inmate Calling Services*, Report and Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd 14,107 (2013) ("2013 ICS Order").

⁸ See *Rates for Interstate Inmate Calling Services*, Second Report and Order and Third Further Notice of Proposed Rulemaking, 30 FCC Rcd 12,763 (2015) ("2015 ICS Order").

⁹ See *Rates for Interstate Inmate Calling Services*, Order on Reconsideration, 31 FCC Rcd 9,300 (2016) ("2016 Order on Reconsideration").

Attached as Exhibit A is a table consisting of intrastate rates that were being charged by the major ICS providers in late 2016. As reflected therein, it is clear that some ICS providers are taking advantage of the absence of rate caps for intrastate ICS phone calls by substantially raising the per-minute rate. Moreover, it would appear that some providers are charging a substantially higher first-minute rate than for all subsequent minutes.

At first glance, this appears to be permissible because the intrastate ICS rate cap has been stayed. However, Section 64.6080 of the Commission's rules went into effect in March 2016. That rule prohibits the imposition of "per-connection" charges.¹⁰ That rule was adopted to eliminate the prior practice of ICS providers whereby their customers would be charged a "connection fee" of \$3.00 to \$5.00, then a per-minute charge on top of that fee.

As reflected in Exhibit B, it would appear that, for many correctional facilities, Securus charges substantially higher first-minute rates than what it charges for all subsequent minutes. Global Tel*Link also follows this practice, as shown in Exhibit C. Finally, as reflected in Exhibit D, Legacy Inmate Communications continues to charge a connection fee for intrastate calls, in apparent violation of Section 64.6080 of the Commission's rules. It also bears mentioning that, despite providing service to more than 200 correctional authorities, Legacy Inmate Communications conceded to undersigned counsel that it failed to participate in the 2014 Mandatory Data Collection.¹¹

This rate information demonstrates that the Commission has a long way to go to ensure that ICS consumers are protected from unjust, unreasonable and unfair intrastate ICS rates. This information also demonstrates that several ICS providers have taken

¹⁰ See 47 C.F.R. §64.6080 (2016).

¹¹ See Exhibit E.

advantage of the uncertainty surrounding ICS rates to gouge intrastate ICS consumers in county or local correctional facilities by charging widely-divergent per-minute rates that bear a remarkable similarity to prior rate structures that have since been prohibited under Section 64.6080 of the Commission's rules. While there have been some reductions at the county level,¹² a majority of ICS providers continue to charge unjust, unreasonable, and unfair intrastate ICS rates.

Therefore, the ICS Advocates urge the Commission to incorporate specific language into the Action Plan which outlines the efforts to be taken to bring parity among intrastate and interstate ICS rates. As noted in a prior submission, it would appear that state public utility commissions have largely abandoned their regulatory authority to address this matter at the state level,¹³ so it is incumbent upon the Commission to continue to press for comprehensive reform which will protect ICS consumers from unjust, unreasonable and unfair ICS rates and fees for all ICS communication services.

B. Introducing Competition Into ICS Marketplace.

The ICS Advocates strongly support the Commission's efforts to introduce competition into the ICS marketplace. In fact, the original Wright Petition sought to end exclusive contracts between privately-owned prisons and ICS providers.¹⁴ The Wright Petitioners conclusively demonstrated that, even in 2003, it was possible to introduce multiple ICS providers at a correctional facility while still maintaining the requisite security protocols. As the Wright Petitioners noted seventeen years ago, the introduction of

¹² See New Jersey P.L.2016, c.37 (2016).

¹³ See *Opposition to Petition for Stay Pending Judicial Review by State and Local Government Petitioners*, WC Dkt. 12-375, pgs.6-7 (filed Sept. 9, 2016).

¹⁴ See *Wright Petition*, pg. 3.

competition would "quickly bring the rates charged by [ICS providers] down to their actual efficient costs."¹⁵

In light of the Commission's reluctance to adopt the proposal to introduce competition into the ICS marketplace, the Wright Petitioners' submitted the Alternative Petition in an effort to minimize the impact of such reluctance on ICS consumers. The Alternative Proposal preserved the monopolistic practices of correctional authorities and ICS providers, but sought the adoption of benchmark ICS rates at levels well above the demonstrated cost of providing service.¹⁶ Because the Commission's past reliance on competition to reduce rates was shown to be misguided due to the existence of exclusive contracts, the Wright Petitioners argued that the adoption of benchmark rates would preserve the monopolistic practices, but deliver urgently-needed relief to ICS consumers.¹⁷

The first two orders released in WC Docket 12-375 did not substantively address the issue of introducing competition into the ICS marketplace. The Third Further Notice of Proposed Rulemaking sought comment on "whether there are ways to promote competition within the ICS market to enable the Commission to sunset or eliminate our regulations adopted herein in the future."¹⁸ The Commission also sought comments on whether there were "ways to mitigate concerns raised in the record that multiple providers could increase burdens and make it 'more difficult...to maintain security.'"¹⁹

¹⁵ *Id.*, pg. 12.

¹⁶ *See Alternative Petition*, pg. 4.

¹⁷ *Billed Party Preference for InterLATA 0+ Calls*, Second Report and Order and Order on Reconsideration, 13 FCC Rcd 6122 (1998), *mod.*, 16 FCC Rcd 22,314 (2001).

¹⁸ *See Rates for Interstate Inmate Calling Services*, Third Further Notice of Proposed Rulemaking, 30 FCC Rcd 12,900 (2015) ("3rd FNPRM").

¹⁹ *Id.*, 30 FCC Rcd at 12,902 (quoting County of Butler Prison Board).

In response, the Wright Petitioners updated its 2003 competition proposal, and supplied a detailed outline demonstrating how competition in the ICS marketplace could be introduced. In light of the fact that the Commission has yet to act on the 3rd FNPRM, the ICS Advocates have attached the proposal that was previously presented, and hereby incorporate that proposal herewith.²⁰ All parties to WC Docket 12-375 have been aware of this proposal, and several parties provided their response to the proposal in their reply comments.

Since at least 2003, the Commission could have adopted rules to introduce competition into the ICS marketplace, and since 2003 it has also been true that the ICS providers and correctional authorities have rejected those efforts. It is clear that the Commission's reliance on market forces over the intervening **17 years** has utterly failed to deliver the statutorily-mandated just, reasonable and fair rates. Therefore, the ICS Advocates encourage the incorporation of their 2016 proposal into the final draft of the Action Plan.

C. Eliminating Site Commissions (Kickbacks) To Correctional Facilities.

In 2003, the Wright Petitioners urged the Commission to prohibit the practice of ICS providers paying correctional authorities a site commission in exchange for monopoly control of a correctional facility. As noted then, the payment of site commissions reinforced the absence of competition to service ICS consumers, and led to the perverse incentive for ICS providers to raise ICS rates and fees.

²⁰ See Exhibit F (Wright Petitioners' 3rd FNPRM Comments); See Exhibit G (Wright Petitioners' 3rd FNPRM Reply Comments).

In the more recent proceeding that commenced in 2013, the ICS Advocates have expressed the opinion that the Commission can reign in excessive site commission payments by introducing competition into the ICS marketplace and/or establishing caps on ICS rates or fees that effectively limited the ability of ICS providers to pay site commissions. The Commission agreed with this approach, which led to the adoption of caps on all ICS rates and fees.

After years of playing coy regarding the payment of site commissions,²¹ ICS providers ultimately renounced their interest in participating in this practice, but also mandated that the Commission establish a "per-minute" facility fee that would be tacked onto the ICS rates and would go directly to the correctional authority.²² The Wright Petitioners objected to this proposal, noting that ICS providers funnel additional forms of consideration to correctional authorities through many different avenues, and that the correctional authorities had failed to establish that their costs in making ICS available were sufficient to justify reimbursement. Not surprisingly, the correctional authorities also rejected this approach.²³

Thus, as in the case of introducing competition into the ICS marketplace, the Commission's approach in regulating the ICS rates and fees will protect ICS consumers, and give ICS providers and correctional authorities the ability to divvy up the profits how they

²¹ See *Overnight Tech: Inmate Phone Industry Says It's Not The 'Bad Guy'*, The Hill (Oct. 19, 2015) (stating that GTL did not advocate for the elimination of site commissions previously "because it would have been business suicide."). See also *2016 Order on Reconsideration*, 31 FCC Rcd at 9313, nt. 98, and 31 FCC Rcd at 9316, nt. 116 (noting Lipman's lack of disclosure as to the identity of his client in the proceeding.).

²² See *Letter from Brian D. Oliver, Chief Executive Officer, GTL, et al., to Chairman Tom Wheeler, Chairman, FCC*, WC Docket No. 12-375, at 5 (filed Oct. 16, 2016).

²³ *Opposition of the National Sheriffs' Association*, WC Docket No. 12-375 (filed Mar. 23, 2016).

see fit. The ICS Advocates would prefer that (i) no site commissions are paid, (ii) there is competition in the ICS marketplace, and (iii) rates are capped at \$0.07 or below for all forms of ICS communications. However, to the extent that correctional authorities demand site commissions and ICS providers reject competition, the Action Plan's promotion of just, reasonable, and fair rates and fees for all ICS communications (i.e., phone, video visitation, email) is the best approach to protect ICS consumers.

D. Protecting Inmates and Families From Shifting Costs Relating to Contraband Cell Phone Detection and Control Technology.

Lastly, the Action Plan correctly recognizes that the costs associated with the development and installation of technology to thwart the use of contraband cell phones should not be shifted onto ICS consumers. This is a very real concern, especially as ICS providers begin to include costly Managed Access Systems into their ICS contracts.

For example, in June 2016, Securus announced that successfully delivered MAS systems in a third state department of correction facility.²⁴ In the Press Statement, Securus noted that it had invested \$40 million in developing the technology. Richard A. Smith, the Chief Executive Officer of Securus, also stated:

MAS systems do not usually stand on their own economically – but when we combine them with inmate audio communications, video, inmate funding, jail management systems, electronic medical records, grievance reporting, data analytics, parolee GPS tracking, location based services, inmate tablets, electronic books, and inmate education/job searches – that is a bundle of products that helps everyone.²⁵

This statement is particularly alarming for two reasons. First, Mr. Smith confirms that the systems are not economic as stand-alone acquisitions. Second, Mr. Smith confirms that the

²⁴ See *Securus Announces Third DOC Facility to Approve/Accept Its Managed Access Systems (MAS) Technology*, Press Statement, June 20, 2016.

²⁵ *Id.*

"one-stop shop" approach that has taken hold in the ICS marketplace will lead to the recovery of the \$40 million investment from inmates and their families through higher ICS rates and fees.

Making matters worse for the pocketbooks of inmates and their loved ones is that several studies have demonstrated that the MAS technologies do not offer a comprehensive solution to the presence of contraband cellphones in correctional facilities. Previously, the Wright Petitioners submitted a report by the Inspector General of the Department of Justice which highlighted the prominent role of correctional officers in smuggling cell phones into their own facilities.²⁶

Two studies that separately reviewed the installation of MAS technology in the Mississippi State Penitentiary and the Baltimore City Jail Complex raise similar questions regarding those systems. For example, with respect to the Baltimore City Jail Complex, the report concluded that:

A significant conclusion that can be made is that while managed access had a significant impact within the facilities where it was deployed, other factors unrelated to the technology such as policy changes also contributed to the overall decline of illegal cellphone use throughout the prison system (to include facilities with deployed managed access systems). When queried about this overall trend system-wide, DPSCS suggested that increased vigilance implemented through policy changes, as well as increased mandatory penalties for those caught with an illegal device contributed to this reduction. For example, it was suggested that rotating correctional staff between regional prison entrance check points likely impacted the ability for staff members to smuggle in illegal devices. The consequences of possession of an illegal cellular device in a Maryland correctional facility have changed to now include criminal penalties, via misdemeanor charges which can result

²⁶ See *Ex Parte Submission*, GN Docket 13-111, July 11, 2016. That submission also cited then-recent RFI response by CenturyLink to the Virginia Department of Corrections, wherein CenturyLink asserted that the cost of MAS installations "must be 'priced in' to the [provider's] financial offer" and that this type of system will not 'pay for itself' by an increase in ICS call volume. In light of the bulky nature of the July 11, 2016 submission, the ICS Advocates hereby incorporate that filing by reference (<https://www.fcc.gov/ecfs/filing/10712066601324>).

in up to a 3 year jail sentence. It was also noted that administrative sanctions that can now be levied against prisoners, to include disciplinary segregation and loss of privileges.²⁷

A similar finding was made in the report analyzing the implementation of MAS in Mississippi. That report sounded a strong cautionary warning with respect to the costly MAS technology:

The corrections community must understand that managed access is not – and should not – be considered a silver bullet solution for the contraband cell phone problem. Cellular devices that cannot transmit a call or text pose potential harm in the correctional environment. Managed access should be utilized in conjunction with physical search and seizures of contraband cell phones. As noted above, multifunction device capabilities that fall outside of the scope of cellular communications simply cannot be managed with managed access technology and have to be mitigated via other means. Managed access technology serves as a tool to mitigate use of these devices by denying cellular service, diminishing the overall utility of smuggling these devices into a correctional facility. Clearly inmate use of multifunction device capabilities which fall outside of cellular communications requires mitigation using non-managed access system methods, to include physical intervention. **Put simply, managed access technology should be viewed as supplemental to existing contraband policies and practices.**²⁸

Similarly, some correctional authorities have shifted away from the costly MAS technology.

For example, despite entering into an 2012 agreement with GTL to implement MAS technology at all state correctional facilities, the State of California recently announced that it was acquiring significantly cheaper cell phone detection systems from Metrasens.²⁹

In a related news article, the decision was made to move "from call blocking to trying to keep the phones out in the first place."³⁰ Finally, the State of Missouri recently amended a

²⁷ See *Analysis of Managed Access Technology In An Urban Deployment: Baltimore City Jail Complex*, Fred Frantz, Phil Harris, September 2016, pgs. 36-37 (attached as [Exhibit H](#)).

²⁸ *A Case Study of Mississippi State Penitentiary's Managed Access Technology*, Eric Grommon, Ph.D., et al, August 2015, pg. 87 (attached as [Exhibit I](#)) (emphasis added).

²⁹ *California Department of Corrections and Rehabilitation Chooses Cellsense from Metrasens*, Press Statement, Digital Media Online, Sept. 1, 2016.

pending Request for Proposal to eliminate the MAS requirement, shifting instead to significantly less expensive contraband detection systems.³¹

As noted above, the ICS Advocates' sole concern with respect to the contraband cellphone subject matter is to ensure that the costs associated with the acquisition and implementation of these systems are not passed onto non-offending inmates and their families. It is well established that a cognizable share of contraband cellphone usage relates to an effort on the part of inmates to avoid the unjust, unreasonable and unfair ICS rates and fees that are currently being charged by ICS providers.³²

In fact, the Acting Commissioner of the New York Department of Corrections and Community Supervision previously submitted a letter, wherein he stated:

The Department believes that a lower calling rate has also contributed to a lower rate of illicit cell phone use by inmates in New York. In 2012, the Department confiscated less than 100 cell phones, compared to over ten thousand annual seizures in comparably-sized correctional systems...Phone rates are a contributing factor [to the reduction], but so too are good security measures for both visitation and perimeter security, adequate training and

³⁰ *Cellphones Keep Cropping Up Inside California Prisons*, Andria Borba, *et al*, Nov. 15, 2016 (www.sanfrancisco.cbslocal.com/2016/11/15/cellphones-keep-cropping-up-inside-california-prisons/).

³¹ *Addendum #2 to Solicitation No. RFP T30034901700137*, State of Missouri (<http://missouribuys.mo.gov/bidboard.html>).

³² *See, e.g., Disconnected—The Safe Prisons Communications Act Fails To Address Prison Communications*, Jane C. Christie, 51 *Jurimetrics Journal* 17, 50-53 (2010) ("Lack of affordable and regular telephone communication between inmates and their families has pushed many desperate families to turn to contraband cell phones....Even proponents of jamming technology have recognized that increased legal access to telephones could decrease the amount of contraband cell phones.") (*citing Deadly Weapon*, Vince Beiser, *Wired*, June 2009, pg. 132, 137 ("But investigations have established that most calls placed on contraband mobiles are harmless—just saying hi to family and friends.") and *Cheap Calls For Inmates Cut Cell Phone Smuggling*, Paul Hammel, *Omaha World-Herald*, May 17, 2010, at B1 ("Houston said several states and even private prison corporations have contacted Nebraska about its relatively few problems with cell phone smuggling. He has recommended that they lower their phone call rates.")).

compensation for line staff, and a zero tolerance policy that does not allow anyone to possess a cell phone inside a New York State prison.³³

As such, to the extent that the Commission can establish lasting reforms with respect to ICS rates and fees, correctional authorities will see that the demand for contraband cellphone will be reduced. Furthermore, to the extent that there are less expensive options, including cutting off the flow of contraband cellphones through the enforcement of staff inspections and acquiring the substantially cheaper passive detection systems, it is likely that the supply of contraband cellphones will be significantly cut-off.

Only after the correctional authorities have taken these straight-forward approaches to addressing contraband cellphones, and have seen these efforts not be effective, should a determination be made as to whether inmates and their families should be left holding the bill for these million-dollar technological solutions. However, in no respect should the Commission permit ICS providers or correctional authorities to shift the cost of these systems onto the backs of inmates and their families through unregulated ICS rates and fees, and the ICS Advocates appreciate the acknowledgement of that risk in the Action Plan, and strongly support efforts to reduce the impact on ICS consumers..

III. CONCLUSION

As always, the ICS Advocates would like to express their gratitude to Commissioner Clyburn for her relentless efforts to ensure that inmates and their families are protected from unjust, unreasonable and unfair ICS rates, fees and practices imposed upon them by the ICS providers and correctional authorities.

³³ *Letter of Anthony J. Annucci, Acting Commissioner, dated July 8, 2013, pg. 2, nt. iii, WC Docket 12-275.*

The *#Solutions2020* Action Plan demonstrates Commissioner Clyburn's dedication to protecting consumers, and we stand ready to assist in any way to reach that goal.

Respectfully submitted,

**THE WRIGHT PETITIONERS,
PRISON POLICY INITIATIVE,
NEW JERSEY ADVOCATES FOR
IMMIGRANT DETAINEES, and
UNITED CHURCH OF CHRIST, OC INC.**

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EXHIBIT A

Intra-State Rates for ICS Providers
(collected November 28 – December 12, 2016)

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
AL	Department of Corrections – All Locations	CenturyLink	0.25	0.25	3.75
AZ	Department of Corrections – All Locations	CenturyLink	0.21	0.21	3.15
FL	Escambia County	CenturyLink	0.21	0.21	3.15
FL	Hernando County	CenturyLink	0.21	0.21	3.15
FL	Hillsborough County	CenturyLink	0.20	0.20	3.00
FL	Leon County	CenturyLink	0.21	0.21	3.15
FL	Okeechobee County	CenturyLink	0.25	0.25	3.75
FL	Pasco County	CenturyLink	0.21	0.21	3.15
FL	Putnam County	CenturyLink	0.25	0.25	3.75
FL	Sumter County	CenturyLink	0.25	0.25	3.75
FL	Walton County	CenturyLink	0.25	0.25	3.75
ID	Department of Corrections – All Locations	CenturyLink	0.11	0.11	1.65
KS	Department of Corrections – All Locations	CenturyLink	0.17	0.17	2.55
KS	Johnson County	CenturyLink	0.21	0.21	3.15
KS	Kansas Juvenile	CenturyLink	0.40	0.40	6.00
KS	Larned Hospital	CenturyLink	0.15	0.15	2.25
KS	Larned Juvenile	CenturyLink	0.40	0.40	6.00
LA	East Baton Rouge Parish	CenturyLink	0.16	0.16	2.40
MO	Cole County Sheriff	CenturyLink	0.25	0.25	3.75
MO	Jackson County	CenturyLink	0.10	0.10	1.50
MO	Platte County	CenturyLink	0.25	0.25	3.75
NC	Lenoir County Jail	CenturyLink	0.25	0.25	3.75
NV	Clark County	CenturyLink	0.21	0.21	3.15
NV	Department of Corrections – All Locations	CenturyLink	0.11	0.11	1.65
NV	Las Vegas City	CenturyLink	0.25	0.25	3.75
TX	Department of Criminal Justice–All Locations	CenturyLink	0.26	0.26	3.90
UT	Department of Corrections – All Locations	CenturyLink	0.19	0.19	2.85
UT	Salt Lake County	CenturyLink	0.19	0.19	2.85
WI	Department of Corrections – All Locations	CenturyLink	0.12	0.12	1.80
WI	Milwaukee HOC	CenturyLink	0.14	0.14	2.10
WI	Milwaukee Jail	CenturyLink	0.14	0.14	2.10
WI	Resource Center	CenturyLink	0.12	0.12	1.80
WI	Sand Ridge	CenturyLink	0.10	0.10	1.50
WV	Department of Corrections – All Locations	CenturyLink	0.03	0.03	0.47
AL	Fayette County Jail	GTL	0.21	0.21	3.15
AL	Jefferson County – All Locations	GTL	0.21	0.21	3.15
AR	Jefferson County Adult Jail	GTL	4.64	0.69	14.30

* Rate Calculator lists "Connection Charge" in addition to per minute rate. 15 Min. Rate = Connection Rate + (15 * Add. Min. Rate).

Telmate does not make its rates available to the public without having to call for each facility – "DNMA."

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
AR	Sebastian County Jail	GTL	3.75	0.25	7.25
AR	Washington County AR Jail	GTL	5.00	0.00	5.00
AR	White County Jail	GTL	4.09	0.29	8.15
AZ	APACHE Junction AZ- City Detention Unit	GTL	0.21	0.21	3.15
AZ	Avondale City Detention Facility	GTL	0.21	0.21	3.15
AZ	CCA Saguaro Correctional Center	GTL	0.21	0.21	3.15
AZ	Chandler City Detention Facility	GTL	0.21	0.21	3.15
AZ	Gila County – All Locations	GTL	0.46	0.46	6.90
AZ	Glendale City Jail	GTL	0.22	0.22	3.30
AZ	Maricopa County – All Locations	GTL	0.20	0.20	3.00
AZ	Mesa City Holding Facility	GTL	3.70	0.30	7.90
AZ	Mohave County Juvenile Detention Center	GTL	0.21	0.21	3.15
AZ	Pima County - All Locations	GTL	0.20	0.20	3.00
CA	Alameda County – All Locations	GTL	3.65	0.65	12.75
CA	CADOC – Department of Corrections – All Locations	GTL	0.14	0.13	2.02
CA	CADOC – Custody to Community Transitional Reentry Program	GTL	0.21	0.21	3.15
CA	CADOC – Division of Juvenile Justice	GTL	0.03	0.03	0.45
CA	Contra Costa County – All Locations	GTL	0.25	0.25	3.75
CA	El Dorado County – All Locations	GTL	0.40	0.40	6.00
CA	Glenn County Sheriff Department	GTL	0.40	0.40	6.00
CA	Humboldt County – All Locations	GTL	0.42	0.42	6.30
CA	Kern County – All Locations	GTL	0.31	0.31	4.65
CA	Lake County Jail – All Locations	GTL	0.29	0.29	4.35
CA	Los Angeles County	GTL	0.29	0.29	4.35
CA	Los Angeles Police Department	GTL	0.29	0.29	4.35
CA	Marin County Jail	GTL	0.40	0.40	6.00
CA	Marin County Probation	GTL	3.65	0.65	12.75
CA	Mendota FCI	GTL	0.29	0.29	4.35
CA	Merced County – All Locations	GTL	0.48	0.48	7.20
CA	Orange County, CA	GTL	0.29	0.29	4.35
CA	San Benito County	GTL	0.29	0.29	4.35
CA	San Bernardino County Juvenile	GTL	0.29	0.29	4.35
CA	San Diego MCC	GTL	0.29	0.29	4.35
CA	San Francisco County Jail	GTL	0.29	0.29	4.35
CA	San Joaquin County Juvenile Detention	GTL	0.21	0.21	3.15
CA	San Luis Obispo County	GTL	0.29	0.29	4.35
CA	Santa Clara County	GTL	0.29	0.29	4.35
CA	Shafter Community Correctional (CCF)	GTL	0.29	0.29	4.35
CA	Shasta County	GTL	0.29	0.29	4.35

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State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
CA	Solano County	GTL	0.16	0.16	2.40
CA	Solano Probation Juvenile Hall	GTL	0.16	0.16	2.40
CA	Sonoma County	GTL	0.25	0.25	3.75
CA	Sonoma County - Juvenile Justice Center	GTL	0.25	0.25	3.75
CA	Stanislaus County – All Locations	GTL	0.23	0.23	3.45
CA	Tehama County Jail	GTL	0.29	0.29	4.35
CA	Terminal Island FCI	GTL	0.29	0.29	4.35
CA	Tulare County	GTL	0.29	0.29	4.35
CA	USMC Camp Pendleton Brig	GTL	0.29	0.29	4.35
CA	USN_CA-USMC Miramar NAVONBRIG	GTL	0.29	0.29	4.35
CA	Ventura County - Juvenile Probation	GTL	0.31	0.31	4.65
CA	Ventura County Jail	GTL	0.31	0.31	4.65
CA	Victorville USP	GTL	0.29	0.29	4.35
CA	Yolo County Jail	GTL	0.29	0.29	4.35
CA	Yuba County Jail	GTL	0.29	0.29	4.35
CO	Arkansas Valley (AVCF)	GTL	0.12	0.12	1.80
CO	Bent County Correctional (BCCF)	GTL	0.12	0.12	1.80
CO	Buena Vista Correctional (BVCC)	GTL	0.12	0.12	1.80
CO	Canon Minimum Centers (CMC)	GTL	0.12	0.12	1.80
CO	Centennial Correctional (CCF)	GTL	0.12	0.12	1.80
CO	Cheyenne Mountare-Entry (CMRC)	GTL	0.12	0.12	1.80
CO	Colorado Correctional Center	GTL	0.12	0.12	1.80
CO	Colorado DOC – Youthful Offender System	GTL	0.12	0.12	1.80
CO	Colorado State Penitentiary	GTL	0.12	0.12	1.80
CO	Colorado State Penitentiary II	GTL	0.12	0.12	1.80
CO	Colorado Territorial Correctional Facility	GTL	0.12	0.12	1.80
CO	Colorado Youth Corrections – All Locations	GTL	0.11	0.11	1.65
CO	Crowley County Correctional Facility - CCA	GTL	0.12	0.12	1.80
CO	Delta Correctional Center	GTL	0.12	0.12	1.80
CO	Denver R and D Center (DRDC)	GTL	0.12	0.12	1.80
CO	Denver Women's Correctional (DWCF)	GTL	0.12	0.12	1.80
CO	El Paso County – All Locations	GTL	0.44	0.44	6.60
CO	Fremont Correctional (FCF)	GTL	0.12	0.12	1.80
CO	La Vista Correctional Facility	GTL	0.12	0.12	1.80
CO	Limon Correctional Facility	GTL	0.12	0.12	1.80
CO	Rifle Correctional Center	GTL	0.12	0.12	1.80
CO	San Carlos Correctional Facility	GTL	0.12	0.12	1.80
CO	Sterling Correctional Facility	GTL	0.12	0.12	1.80
CO	Trinidad Correctional Facility	GTL	0.12	0.12	1.80
DE	Department of Corrections – All Locations	GTL	0.05	0.05	0.75

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FL	Blackwater River Facility (GEO)	GTL	0.11	0.11	1.65
FL	Brevard County	GTL	0.25	0.25	3.75
FL	Charlotte County	GTL	0.16	0.16	2.40
FL	Collier County	GTL	0.16	0.16	2.40
FL	Duval County – All Locations	GTL	0.28	0.28	4.20
FL	GEO Bay Correctional Facility	GTL	0.11	0.11	1.65
FL	GEO Graceville Correctional Facility	GTL	0.11	0.11	1.65
FL	GEO Moore Haven Correctional Facility	GTL	0.11	0.11	1.65
FL	Highlands County FL-Jail	GTL	0.16	0.16	2.40
FL	Indian River County	GTL	0.22	0.22	3.30
FL	Lee County – All Locations	GTL	0.22	0.22	3.30
FL	Manatee County Detention	GTL	0.30	0.30	4.50
FL	Martin County	GTL	0.26	0.26	3.90
FL	Miami-Dade County – All Locations	GTL	0.14	0.14	2.10
FL	Orange County Jail	GTL	0.14	0.14	2.10
FL	Pinellas County	GTL	0.24	0.24	3.60
FL	Polk County – All Locations	GTL	0.36	0.36	5.40
FL	Santa Rosa County FL-Work Release	GTL	0.21	0.21	3.15
FL	St. Lucie County	GTL	0.25	0.25	3.75
GA	Clarke County GA- Jail	GTL	0.11	0.11	1.65
GA	Cobb County, GA	GTL	0.12	0.12	1.80
GA	Department of Corrections – All Locations	GTL	0.17	0.17	2.55
GA	East Point Law Enforcement Center Georgia	GTL	0.21	0.21	3.15
GA	Gwinnett County, GA- Correctional Complex	GTL	0.13	0.13	1.95
GA	Pelham County	GTL	2.19	0.19	4.85
GA	South Fulton	GTL	2.70	0.00	2.70
HI	Department of Corrections – All Locations	GTL	0.13	0.13	1.95
IA	Black Hawk County Jail	GTL	0.22	0.22	3.30
IA	Iowa State Training School	GTL	0.11	0.11	1.65
IA	Scott County Jail	GTL	0.16	0.16	2.40
IL	DuPage County Corrections	GTL	0.21	0.21	3.15
IL	Peoria County IL-Jail	GTL	0.21	0.21	3.15
IN	Allen County IN-Work Release	GTL	0.24	0.24	3.60
IN	Clay County-IN	GTL	0.67	0.67	10.05
IN	Delaware County, IN	GTL	2.55	0.30	6.75
IN	Department of Corrections – All Locations	GTL	0.24	0.24	3.60
IN	Heritage Trails Correctional Facility - GEO	GTL	0.21	0.21	3.15
IN	Howard County, IN	GTL	0.24	0.24	3.60
IN	Lake County – Community Corrections	GTL	0.24	0.24	3.60
IN	Madison County – Justice Center	GTL	0.32	0.32	4.80

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IN	Madison County – Men's and Women's WR	GTL	0.32	0.32	4.80
IN	Marion County – Main Jail	GTL	0.26	0.26	3.90
IN	Marion County Superior Court Juvenile	GTL	4.45	0.00	4.45
IN	Monroe County Jail	GTL	1.75	0.25	5.25
IN	St. Joseph County Jail	GTL	0.24	0.24	3.60
IN	Tippecanoe County Jail	GTL	0.24	0.24	3.60
KS	JRFC Ft. Leavenworth	GTL	0.21	0.21	3.15
KS	Leavenworth County Jail	GTL	0.19	0.19	2.85
KS	Riley County	GTL	0.55	0.55	8.25
KS	USDB Ft. Leavenworth	GTL	0.21	0.21	3.15
LA	Concordia Parish	GTL	2.30	0.15	4.40
LA	Jackson Correctional Center	GTL	2.24	0.09	3.50
LA	Ouachita Parish Correctional	GTL	0.18	0.18	2.70
MA	Department of Corrections - All Locations	GTL	0.10	0.10	1.50
MA	Hampden County - Alcohol Center	GTL	0.12	0.12	1.80
MA	Hampden County - Pre-release Center	GTL	0.12	0.12	1.80
MA	Hampden County - Regional Women's Center	GTL	0.12	0.12	1.80
MA	Norfolk County Jail	GTL	0.16	0.16	2.40
MA	Plymouth County	GTL	0.21	0.21	3.15
MD	Caroline County Department of Corrections	GTL	0.25	0.25	3.75
MD	Department of Corrections – All Locations	GTL	0.03	0.04	0.52
MD	Juvenile Services Department – All Locations	GTL	0.03	0.04	0.52
MD	Montgomery County	GTL	0.65	0.00	0.65
MI	Berrien County	GTL	1.10	1.10	16.50
MI	Department of Corrections – All Locations	GTL	0.20	0.20	3.00
MI	Detroit City Jail	GTL	3.65	0.65	12.75
MI	Hillsdale County	GTL	0.99	0.99	14.85
MI	Lake County Jail, MI	GTL	0.75	0.75	11.25
MI	Lenaewee County	GTL	1.09	1.09	16.35
MI	Monroe County, MI	GTL	4.60	0.65	13.70
MI	Northlake Detention VT DOC – GEO	GTL	0.11	0.11	1.65
MI	Northlake Detention WA DOC - GEO	GTL	0.11	0.11	1.65
MI	Oak Park MI - City Jail	GTL	0.50	0.50	7.50
MI	Oakland County	GTL	4.00	0.50	11.00
MI	Oceana County Jail	GTL	0.67	0.67	10.05
MN	Department of Corrections – All Locations	GTL	0.05	0.05	0.75
MO	Buchanan County	GTL	0.36	0.36	5.40
MO	Greene County	GTL	1.82	0.32	6.30
MS	Alcorn County - Regional Jail	GTL	0.36	0.36	5.34
MS	Bolivar County	GTL	0.68	0.68	10.14

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MS	Caroll-Montgomery County	GTL	0.57	0.57	8.50
MS	Chickasaw County	GTL	0.11	0.11	1.65
MS	Coahoma County	GTL	3.25	0.25	6.75
MS	Covington County	GTL	3.25	0.25	6.75
MS	Department of Corrections – All Locations	GTL	0.11	0.11	1.65
MS	George-Greene County Jail	GTL	0.56	0.56	8.43
MS	Hinds County – All Locations	GTL	0.45	0.45	6.72
MS	Holmes-Humphrey County	GTL	3.25	0.25	6.75
MS	Issaquena County	GTL	3.25	0.25	6.75
MS	Jefferson-Franklin County	GTL	3.25	0.25	6.75
MS	Kemper-Neshoba County	GTL	3.25	0.25	6.75
MS	Lawrence County	GTL	0.58	0.58	8.70
MS	Leake County	GTL	2.71	0.21	5.65
MS	Marion-Walthall County	GTL	3.25	0.25	6.75
MS	Natchez City Jail	GTL	0.49	0.49	7.35
MS	Natchez City Jail - Adams Juvenile	GTL	0.49	0.49	7.35
MS	Pearl River County	GTL	0.19	0.19	2.85
MS	Pike County	GTL	3.25	0.25	6.75
MS	Pontotc County DC	GTL	0.73	0.73	10.95
MS	Rankin County - Adult	GTL	0.26	0.26	3.94
MS	Rankin County - Juvenile	GTL	0.26	0.26	3.94
MS	Washington County	GTL	3.25	0.25	6.75
MS	Wilkinson County Correctional CCI	GTL	0.69	0.69	10.35
MS	Winston-Choctaw County	GTL	3.25	0.25	6.75
NC	Cumberland County	GTL	0.16	0.16	2.40
NC	Department of Adult Corrections – All Locations	GTL	0.10	0.10	1.50
NC	Department of Public Safety – All Locations	GTL	0.10	0.10	1.50
NC	Durham County	GTL	0.16	0.16	2.40
NC	GEO Rivers Correctional	GTL	0.21	0.21	3.15
NC	Mecklenberg County Jail Central	GTL	0.12	0.12	1.74
NC	Mecklenberg County Jail North	GTL	0.12	0.12	1.74
NE	Department of Corrections – All Locations	GTL	0.10	0.10	1.50
NE	Douglas County DOC	GTL	0.13	0.13	1.95
NE	Douglas County Youth Center	GTL	0.13	0.13	1.95
NH	Strafford County Department of Corrections	GTL	0.29	0.29	4.35
NJ	Atlantic County Justice Facility	GTL	0.04	0.04	0.66
NJ	Bergen County Jail	GTL	0.04	0.04	0.66
NJ	Bo Robinson – CEC, Inc.	GTL	0.10	0.10	1.53
NJ	Burlington County	GTL	0.05	0.05	0.76
NJ	Camden County	GTL	0.05	0.05	0.76

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NJ	Cumberland County	GTL	0.05	0.05	0.76
NJ	Delaney Hall – CEC, Inc.	GTL	0.10	0.10	1.44
NJ	Delaney Hall – ICE (CEC, Inc.)	GTL	0.15	0.15	2.25
NJ	Department of Corrections – All Locations	GTL	0.04	0.04	0.66
NJ	Essex County Jail	GTL	0.05	0.05	0.76
NJ	Essex County Juvenile Detention	GTL	0.05	0.05	0.76
NJ	Hudson County Jail	GTL	0.05	0.05	0.76
NJ	Hudson County Jail Annex	GTL	0.05	0.05	0.76
NJ	Hudson County Juvenile Detention	GTL	0.21	0.21	3.15
NJ	Hunterdon County	GTL	2.90	0.40	8.50
NJ	Juvenile Justice Commission – All Locations	GTL	0.04	0.04	0.66
NJ	Mercer County	GTL	0.05	0.05	0.76
NJ	Middlesex County Adult Correctional	GTL	0.05	0.05	0.76
NJ	Middlesex County Juvenile Detention	GTL	0.05	0.05	0.76
NJ	Monmouth County	GTL	0.05	0.05	0.76
NJ	Morris County	GTL	0.05	0.05	0.76
NJ	Ocean County	GTL	0.05	0.05	0.76
NJ	Salem County Correctional Facility	GTL	0.19	0.19	2.85
NJ	Somerset County	GTL	0.05	0.05	0.76
NJ	Sussex County	GTL	0.05	0.05	0.76
NJ	Talbot Hall – CEC, Inc.	GTL	0.08	0.08	1.24
NJ	Toller Hall / Logan Hall – CEC, Inc.	GTL	0.14	0.13	2.02
NJ	Tulley House – CEC, Inc.	GTL	0.07	0.07	1.04
NJ	Union County Jail	GTL	0.25	0.25	3.75
NJ	Union County Juvenile	GTL	0.25	0.25	3.75
NJ	Warren County	GTL	0.05	0.05	0.76
NM	Cibola County Detention Center	GTL	0.15	0.15	2.25
NM	Luna County	GTL	0.15	0.15	2.25
NV	Washoe County Jail Main Jail	GTL	0.14	0.14	2.10
NV	Washoe County Jan Evans JDF	GTL	0.14	0.14	2.10
NY	Albany County	GTL	1.85	0.10	3.25
NY	Allegany County	GTL	4.35	0.40	9.95
NY	Bayview Correctional Facility	GTL	0.05	0.05	0.72
NY	Beacon Correctional Facility	GTL	0.05	0.05	0.72
NY	Broome County	GTL	4.35	0.40	9.95
NY	Butler ASACSC Correctional	GTL	0.05	0.05	0.72
NY	Cattaraugus County	GTL	4.35	0.40	9.95
NY	Cayuga County	GTL	4.35	0.40	9.95
NY	Chateaugay Correctional Facility	GTL	0.05	0.05	0.72
NY	Chautauqua County	GTL	4.35	0.40	9.95

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NY	Chemung County Sheriff's Office	GTL	2.90	0.40	8.50
NY	Chenango County	GTL	4.35	0.40	9.95
NY	Clinton County	GTL	1.76	0.18	4.28
NY	Columbia County	GTL	1.95	0.20	4.75
NY	Cortland County	GTL	4.35	0.40	9.95
NY	Cortland County	GTL	4.35	0.40	9.95
NY	Delaware County	GTL	4.35	0.40	9.95
NY	Department of Corrections – All Locations	GTL	0.05	0.05	0.72
NY	Dutchess County	GTL	4.35	0.40	9.95
NY	Essex County	GTL	1.95	0.20	4.75
NY	Franklin County	GTL	1.95	0.20	4.75
NY	Fulton County	GTL	1.95	0.20	4.75
NY	Genesee County	GTL	4.35	0.40	9.95
NY	Green Haven Correctional Facility	GTL	0.05	0.05	0.72
NY	Greene County	GTL	1.76	0.18	4.28
NY	Herkimer County	GTL	4.35	0.40	9.95
NY	Jefferson County	GTL	4.35	0.40	9.95
NY	Lewis County	GTL	4.35	0.40	9.95
NY	Livingston County	GTL	4.35	0.40	9.95
NY	Madison County	GTL	4.35	0.40	9.95
NY	Monroe County	GTL	4.35	0.40	9.95
NY	Monterey Correctional Facility	GTL	0.05	0.05	0.72
NY	Montgomery County	GTL	1.95	0.20	4.75
NY	Mt McGregor Correctional Facility	GTL	0.05	0.05	0.72
NY	Nassau County	GTL	4.35	0.40	9.95
NY	Niagra County	GTL	4.35	0.40	9.95
NY	Oneida County	GTL	4.35	0.40	9.95
NY	Onondaga County	GTL	4.35	0.40	9.95
NY	Orange County	GTL	4.35	0.40	9.95
NY	Orleans County	GTL	4.35	0.40	9.95
NY	Oswego County	GTL	4.35	0.40	9.95
NY	Otsego County	GTL	4.35	0.40	9.95
NY	Putnam County	GTL	4.35	0.40	9.95
NY	Queens Detention Facility – GEO	GTL	0.21	0.21	3.15
NY	Renssalaer County	GTL	4.35	0.40	9.95
NY	Rikers Island	GTL	0.25	0.25	3.75
NY	Rockland County	GTL	4.35	0.40	9.95
NY	Saratoga County	GTL	1.85	0.10	3.25
NY	Schenectady County	GTL	1.85	0.10	3.25
NY	Schuyler County	GTL	4.35	0.40	9.95

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NY	Seneca County	GTL	4.35	0.40	9.95
NY	St. Lawrence County	GTL	4.35	0.40	9.95
NY	St. Lawrence County	GTL	4.35	0.40	9.95
NY	Sullivan County	GTL	4.35	0.40	9.95
NY	Taconic County	GTL	0.05	0.05	0.72
NY	Tioga County	GTL	4.35	0.40	9.95
NY	Tompkins County	GTL	4.35	0.40	9.95
NY	Tompkins County	GTL	4.35	0.40	9.95
NY	Warren County	GTL	1.95	0.20	4.75
NY	Warren County	GTL	1.95	0.20	4.75
NY	Washington County	GTL	1.95	0.20	4.75
NY	Wayne County	GTL	4.35	0.40	9.95
NY	Westchester County	GTL	4.35	0.40	9.95
NY	Wyoming County	GTL	4.35	0.40	9.95
NY	Yates County	GTL	4.35	0.40	9.95
OH	Brook Park	GTL	0.36	0.36	5.40
OH	Cleveland – House of Corrections	GTL	0.22	0.22	3.30
OH	Cuyahoga County	GTL	0.18	0.19	2.78
OH	Delaware County	GTL	0.24	0.24	3.60
OH	Department of Rehab. And Corrections – All Locations	GTL	0.05	0.05	0.75
OH	Department of Youth Services – All Locations	GTL	0.05	0.05	0.75
OH	East Cleveland	GTL	0.36	0.36	5.40
OH	Franklin County	GTL	0.04	0.04	0.60
OH	Hamilton County	GTL	0.05	0.05	0.75
OH	Jefferson County	GTL	3.11	0.36	8.15
OH	Lake County Adult Detention Facility	GTL	0.34	0.34	5.10
OH	Lakewood Jail	GTL	0.36	0.36	5.40
OH	Lucas County	GTL	0.13	0.13	1.95
OH	Mahoning County – All Locations	GTL	0.20	0.20	3.00
OH	Montgomery County – MonDay Correctional	GTL	0.23	0.23	3.45
OH	Muskingum County Jail	GTL	0.24	0.24	3.60
OH	Parma Heights Jail	GTL	0.36	0.36	5.40
OH	Richmond Heights Jail	GTL	0.36	0.36	5.40
OH	SEPTA Correctional Facility	GTL	0.30	0.30	4.50
OH	Solon Jail	GTL	0.36	0.36	5.40
OH	Stark County Regional Corrections	GTL	0.23	0.23	3.45
OH	Trumbull County	GTL	0.22	0.22	3.30
OH	Trumbull County – Juvenile	GTL	0.22	0.22	3.30
OH	Westlake Jail	GTL	0.36	0.36	5.40
OH	Zanesville Jail	GTL	0.36	0.36	5.40

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State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
OK	Cimarron Correctional-Cushing	GTL	0.20	0.20	3.00
OK	Department of Corrections – All Locations	GTL	0.20	0.20	3.00
OK	Great Plains Correctional Facility - GEO	GTL	0.21	0.21	3.15
OK	Lawton Correctional – GEO	GTL	0.20	0.20	3.00
OK	Muskogee County	GTL	0.11	0.11	1.65
OK	Ponca City Jail	GTL	3.20	0.25	6.70
OR	Columbus County	GTL	0.25	0.25	3.75
OR	Douglas County	GTL	5.31	0.89	17.77
OR	Linn County	GTL	5.24	0.69	14.90
OR	Multnomah County	GTL	1.96	0.11	3.50
OR	Warm Springs	GTL	0.20	0.20	3.00
OR	Yamhill County	GTL	0.16	0.16	2.40
PA	Adams County	GTL	0.24	0.24	3.60
PA	Allegheny County	GTL	0.21	0.21	3.15
PA	Armstrong County	GTL	0.34	0.34	5.10
PA	Bradford County	GTL	0.24	0.24	3.60
PA	Bucks County	GTL	0.33	0.33	4.89
PA	Cambria County	GTL	0.25	0.25	3.75
PA	Chester County	GTL	0.16	0.16	2.40
PA	Clearfield County	GTL	0.27	0.27	4.05
PA	Cumberland County	GTL	0.14	0.14	2.10
PA	Dauphin County	GTL	0.22	0.22	3.30
PA	Delaware County	GTL	0.25	0.25	3.75
PA	Franklin County	GTL	0.22	0.22	3.30
PA	Jefferson County	GTL	3.55	0.55	11.25
PA	Lackawanna County	GTL	0.21	0.21	3.15
PA	Lehigh County	GTL	0.24	0.24	3.60
PA	Luzerne County	GTL	0.16	0.16	2.40
PA	Lycoming County	GTL	0.37	0.37	5.55
PA	Mercer County	GTL	0.22	0.22	3.30
PA	Montgomery County	GTL	0.17	0.17	2.55
PA	Northampton County	GTL	0.16	0.16	2.40
PA	Pennsylvania County	GTL	0.14	0.14	2.10
PA	Philadelphia County	GTL	0.17	0.17	2.58
PA	Schuykill County	GTL	0.25	0.25	3.75
PA	Somerset County	GTL	0.22	0.22	3.30
PA	Washington County	GTL	0.25	0.25	3.75
PA	Wayne County	GTL	3.59	0.59	11.85
PA	Westmoreland County	GTL	0.30	0.30	4.50
PA	York County	GTL	0.25	0.25	3.75

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State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
PA	York County	GTL	0.25	0.25	3.75
RI	Department of Corrections – All Locations	GTL	0.05	0.05	0.70
RI	Providence County	GTL	1.65	0.30	5.85
SC	Charleston County	GTL	0.14	0.14	2.10
SC	Department of Corrections – All Locations	GTL	0.08	0.08	1.20
SC	Greenville County	GTL	2.83	0.33	7.45
SC	Richland County	GTL	0.25	0.25	3.75
SC	Spartanburg County	GTL	0.16	0.16	2.40
SD	Department of Corrections – All Locations	GTL	0.08	0.08	1.20
SD	Pennington County	GTL	0.18	0.17	2.62
TN	Davidson County	GTL	0.05	0.05	0.75
TN	Department of Corrections – All Locations	GTL	0.16	0.16	2.40
TN	Fayette County	GTL	0.19	0.19	2.85
TN	Madison County	GTL	0.28	0.28	4.20
TN	Montgomery County	GTL	0.25	0.25	3.75
TN	Obion County	GTL	0.22	0.22	3.30
TN	Robertson County	GTL	0.12	0.12	1.80
TN	Sevier County	GTL	0.20	0.20	3.00
TN	Shelby County	GTL	0.14	0.14	2.10
TN	Williamson County	GTL	1.50	0.00	1.50
TN	Wilson County	GTL	0.10	0.10	1.50
TX	Arlington	GTL	0.47	0.47	7.05
TX	Big Spring – GEO	GTL	0.21	0.21	3.15
TX	Bowie County	GTL	4.17	0.40	9.80
TX	Burnet County	GTL	4.10	0.34	8.86
TX	Cass County Detention Center	GTL	4.65	0.20	7.45
TX	Central Texas Detention – GEO	GTL	0.21	0.21	3.15
TX	Colorado County	GTL	0.49	0.49	7.35
TX	Corpus Christi	GTL	0.50	0.50	7.50
TX	Duncanville	GTL	0.49	0.49	7.35
TX	El Paso County	GTL	0.09	0.09	1.35
TX	Gaines County	GTL	0.27	0.27	4.05
TX	Galveston County	GTL	0.39	0.39	5.85
TX	Gonzales County	GTL	0.40	0.40	6.00
TX	Gonzales County - Inter Sanction ISF	GTL	0.49	0.49	7.35
TX	Gregg County	GTL	3.40	0.39	8.86
TX	Guadalupe County	GTL	0.49	0.49	7.35
TX	Hidalgo County	GTL	0.45	0.45	6.75
TX	Hill County	GTL	0.45	0.45	6.75
TX	Hood County	GTL	0.39	0.39	5.85

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State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
TX	Houston County – All Locations	GTL	0.22	0.22	3.30
TX	Jefferson County – All Corrections	GTL	0.49	0.49	7.35
TX	Joe Corley Detention – GEO	GTL	1.75	0.25	5.25
TX	Johnson County	GTL	0.52	0.52	7.80
TX	Jones County	GTL	0.53	0.53	8.00
TX	Karnes Correctional Center – GEO	GTL	0.21	0.21	3.15
TX	Karnes County Panna Maria Ave Jail	GTL	0.50	0.50	7.50
TX	Karnes County Wall St Jail	GTL	0.50	0.50	7.50
TX	Lee County	GTL	0.47	0.47	7.05
TX	Lubbock County Community Corr	GTL	0.46	0.46	6.90
TX	Lubbock County Detention Ctr	GTL	0.23	0.23	3.45
TX	Maverick County	GTL	0.41	0.41	6.15
TX	McLennan County – All Locations	GTL	0.35	0.35	5.25
TX	Montgomery County	GTL	0.53	0.53	7.95
TX	Pasadena City Jail	GTL	0.53	0.53	7.95
TX	Pecos County	GTL	0.50	0.50	7.50
TX	Potter County	GTL	0.49	0.49	7.35
TX	Randall County	GTL	0.49	0.49	7.35
TX	Red River County	GTL	4.15	0.39	9.54
TX	Reeves County	GTL	0.49	0.49	7.35
TX	Reeves County Detention – GEO	GTL	0.11	0.11	1.65
TX	Rio Grande Detention – GEO	GTL	0.21	0.21	3.15
TX	Rusk County	GTL	0.49	0.49	7.35
TX	Smith County	GTL	0.44	0.44	6.60
TX	Tom Green County	GTL	0.41	0.41	6.10
TX	Val Verde Correctional – GEO	GTL	0.21	0.21	3.15
TX	Waller County	GTL	4.05	0.33	8.67
TX	Washington County	GTL	0.47	0.47	7.05
TX	Wichita County	GTL	0.55	0.55	8.25
TX	Wilbarger County	GTL	0.49	0.49	7.35
UT	Box Elder County	GTL	1.00	0.04	1.56
UT	Duchesne County	GTL	0.22	0.22	3.30
UT	Sanpete County	GTL	2.92	0.12	4.60
UT	Weber County	GTL	0.19	0.19	2.82
VA	Chesterfield County	GTL	0.11	0.11	1.65
VA	Culpeper County	GTL	4.64	0.69	14.30
VA	Department of Corrections - All Locations	GTL	0.04	0.04	0.61
VA	Gloucester County	GTL	0.17	0.17	2.55
VA	Hanover County	GTL	0.23	0.23	3.45
VA	Henrico County Regional Jails	GTL	0.13	0.13	1.94

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State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
VA	Mecklenburg Jail	GTL	0.28	0.28	4.20
VA	Meherin River County Regional Jail	GTL	0.28	0.28	4.20
VA	Middle River County Regional Jail	GTL	0.13	0.13	1.94
VA	New River Valley	GTL	0.23	0.23	3.45
VA	Norfolk City	GTL	0.16	0.15	2.32
VA	Northwestern County	GTL	0.19	0.19	2.85
VA	Peumansend Creek Regional Jail	GTL	0.22	0.22	3.30
VA	Piedmont Regional Jail	GTL	0.25	0.25	3.75
VA	Portsmouth Jail	GTL	0.15	0.15	2.25
VA	Prince William County	GTL	0.25	0.25	3.75
VA	Rappahannock Regional Jail	GTL	0.24	0.24	3.60
VA	Richmond Jail	GTL	0.07	0.07	1.05
VA	Riverside District Regional Jail	GTL	0.11	0.11	1.65
VA	Southside Regional Jail	GTL	0.18	0.18	2.70
VA	Southwestern Regional Jail	GTL	0.18	0.18	2.70
VA	Western Tidewater Regional Jail	GTL	0.25	0.25	3.75
VT	Department of Corrections - All Locations	GTL	0.12	0.12	1.76
WA	Department of Corrections – All Locations	GTL	0.11	0.11	1.65
WA	Grant County - County Jail	GTL	0.19	0.19	2.85
WA	Issaquah City Jail	GTL	0.26	0.26	3.90
WA	Snohomish County - Denney Juvenile	GTL	0.20	0.20	3.00
WA	Snohomish County - Main Jail	GTL	0.20	0.20	3.00
WA	Spokane County - Geiger Correctional	GTL	0.26	0.26	3.90
WA	Spokane County Jail	GTL	0.26	0.26	3.90
WA	Thurston County - Nisqually Tribal Jail	GTL	0.28	0.28	4.20
WI	Clark County Jail	GTL	4.64	0.69	14.30
WI	Kenosha County Detention Center	GTL	0.50	0.50	7.50
WI	Menominee County - Tribal Jail	GTL	0.55	0.55	8.25
WI	Outagamie County Jail	GTL	0.16	0.16	2.40
WI	Sauk County Jail	GTL	0.22	0.22	3.30
WV	Central Regional Jail	GTL	0.12	0.12	1.80
WV	Eastern Regional Jail	GTL	0.12	0.12	1.80
WV	North Central Regional Jail	GTL	0.12	0.12	1.80
WV	Northern Regional Jail	GTL	0.12	0.12	1.80
WV	Potomac Highlands Jail	GTL	0.12	0.12	1.80
WV	South Central Regional Jail	GTL	0.12	0.12	1.80
WV	South West Regional Jail	GTL	0.12	0.12	1.80
WV	Tygart Valley Jail	GTL	0.12	0.12	1.80
WV	Western Regional Jail	GTL	0.12	0.12	1.80
AZ	Graham County Sheriff	ICSolutions	0.21	0.21	3.15

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AZ	Mohave County Sheriff	ICSolutions	0.21	0.21	3.15
AZ	Navajo County Jail	ICSolutions	0.21	0.21	3.15
CA	GEO WRDF San Diego	ICSolutions	0.20	0.20	3.00
CA	Kings County	ICSolutions	0.21	0.21	3.15
CA	MTC Taft Correctional Institution	ICSolutions	0.08	0.08	1.20
CA	Placer County Sheriff	ICSolutions	0.37	0.37	5.55
CA	Sacramento County Sheriff	ICSolutions	0.21	0.21	3.15
CA	Santa Ana City Jail	ICSolutions	0.21	0.21	3.15
CA	Santa Barbara County	ICSolutions	0.16	0.16	2.40
CA	Santa Cruz County Sheriff	ICSolutions	0.16	0.16	2.40
CO	Adams County	ICSolutions	0.21	0.21	3.15
CO	Boulder County	ICSolutions	0.21	0.21	3.15
CO	Larimer County	ICSolutions	0.21	0.21	3.15
FL	Escambia County	ICSolutions	0.21	0.21	3.15
FL	GEO South Bay Correctional Facility	ICSolutions	0.11	0.11	1.65
FL	Hamilton County	ICSolutions	0.21	0.21	3.15
FL	Hernando County	ICSolutions	0.21	0.21	3.15
FL	Hillsborough County	ICSolutions	0.20	0.20	3.00
FL	Kissimmee County	ICSolutions	0.21	0.21	3.15
FL	Lafayette County	ICSolutions	0.21	0.21	3.15
FL	Leon County	ICSolutions	0.21	0.21	3.15
FL	Monroe County Sheriff	ICSolutions	0.21	0.21	3.15
FL	Ocala Re-Entry Center Jail	ICSolutions	0.21	0.21	3.15
FL	Okeechobee County	ICSolutions	0.25	0.25	3.75
FL	Osceola County Corrections	ICSolutions	0.21	0.21	3.15
FL	Pasco County Sheriff	ICSolutions	0.21	0.21	3.15
FL	Putnam County Detention	ICSolutions	0.25	0.25	3.75
FL	Sumter County Sheriff	ICSolutions	0.25	0.25	3.75
FL	Walton County Department of Corrections	ICSolutions	0.25	0.25	3.75
GA	Atlanta	ICSolutions	0.18	0.18	2.70
GA	Bartow County Sheriff	ICSolutions	0.16	0.16	2.40
GA	Bulloch County	ICSolutions	0.18	0.18	2.70
GA	Carroll County Prison	ICSolutions	0.18	0.18	2.70
GA	Coweta County	ICSolutions	0.18	0.18	2.70
GA	Dawson County Detention Center	ICSolutions	0.18	0.18	2.70
GA	Floyd County	ICSolutions	0.18	0.18	2.70
GA	Georgia Department of Juvenile Justice	ICSolutions	0.21	0.21	3.15
GA	Hall County Correctional Institute	ICSolutions	0.11	0.11	1.65
GA	Jackson County Correctional Institution	ICSolutions	0.18	0.18	2.70
GA	Mitchell County	ICSolutions	0.18	0.18	2.70

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GA	Screven County Correctional Institute	ICSolutions	0.18	0.18	2.70
GA	Spalding County Correctional Institution	ICSolutions	0.16	0.16	2.40
GA	Stephens County Sheriff	ICSolutions	0.18	0.18	2.70
GA	Terrell County Correctional Institute	ICSolutions	0.18	0.18	2.70
GA	Thomas County Board of Commissioners	ICSolutions	0.18	0.18	2.70
GA	Troup County Correctional Institute	ICSolutions	0.11	0.11	1.65
IA	Dubuque County	ICSolutions	0.21	0.21	3.15
IA	Jasper County Sheriff	ICSolutions	0.22	0.22	3.30
IA	Muscatine County Jail	ICSolutions	0.20	0.20	3.00
ID	Department of Corrections – All Locations	ICSolutions	0.11	0.11	1.65
IL	Champaign County	ICSolutions	0.17	0.17	2.55
IL	Fayette County Sheriff	ICSolutions	0.21	0.21	3.15
IL	Jo Daviess County Jail	ICSolutions	0.21	0.21	3.15
IL	Kane County Sheriff	ICSolutions	0.21	0.21	3.15
IL	Marion County Sheriff	ICSolutions	0.21	0.21	3.15
IL	McHenry County Sheriff	ICSolutions	0.21	0.21	3.15
IL	Sangamon County Sheriff	ICSolutions	0.22	0.22	3.30
IN	Blackford County	ICSolutions	0.21	0.21	3.15
IN	Boone County Sheriff	ICSolutions	0.26	0.26	3.90
IN	Fayette County Sheriff	ICSolutions	0.21	0.21	3.15
IN	Huntington County	ICSolutions	0.21	0.21	3.15
IN	Jackson County Sheriff	ICSolutions	0.21	0.21	3.15
KS	Cowley County Sheriff	ICSolutions	0.21	0.21	3.15
KS	Department of Corrections – All Locations	ICSolutions	0.18	0.18	2.70
KS	Douglas County	ICSolutions	0.21	0.21	3.15
KS	Finney County Sheriff	ICSolutions	0.21	0.21	3.15
KS	Johnson County	ICSolutions	0.21	0.21	3.15
KS	Kansas Juvenile Justice Authority	ICSolutions	0.45	0.45	6.75
KS	Learned State Hospital	ICSolutions	0.15	0.15	2.25
LA	East Baton Rouge Parish Sheriff	ICSolutions	0.16	0.16	2.40
MA	Hampshire County	ICSolutions	0.21	0.21	3.15
MD	Anne Arundel County Sheriff	ICSolutions	0.16	0.16	2.40
MD	Baltimore County Corrections	ICSolutions	0.16	0.16	2.40
MD	Carroll County	ICSolutions	0.17	0.17	2.55
MD	Cecil County Detention Center	ICSolutions	0.16	0.16	2.40
MD	Charles County Detention Center	ICSolutions	0.16	0.16	2.40
MD	Frederick County	ICSolutions	0.16	0.16	2.40
MD	Harford County Detention	ICSolutions	0.16	0.16	2.40
MD	Howard County Department of Corrections	ICSolutions	0.16	0.16	2.40
MD	Kent County Sheriff	ICSolutions	0.16	0.16	2.40

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MD	Montgomery County	ICSolutions	0.08	0.08	1.22
MD	Somerset County Detention Center	ICSolutions	0.16	0.16	2.40
MD	St. Marys County Detention Center	ICSolutions	0.16	0.16	2.40
MD	Washington County	ICSolutions	0.16	0.16	2.40
MD	Wicomico Co. Department of Corrections	ICSolutions	0.18	0.18	2.70
MI	Calhoun County Sheriff	ICSolutions	0.21	0.21	3.15
MI	Cass County Sheriff	ICSolutions	0.21	0.21	3.15
MI	Kalkaska County Sheriff	ICSolutions	0.22	0.22	3.30
MI	Lake County Sheriff	ICSolutions	0.25	0.25	3.75
MI	Livingston County	ICSolutions	0.21	0.21	3.15
MI	Macomb County	ICSolutions	0.21	0.21	3.15
MI	Mason County Sheriff	ICSolutions	0.21	0.21	3.15
MI	Mecosta County	ICSolutions	0.21	0.21	3.15
MI	Monroe County	ICSolutions	0.21	0.21	3.15
MI	Oakland County Sheriff	ICSolutions	0.25	0.25	3.75
MI	Osceola County Sheriff	ICSolutions	0.21	0.21	3.15
MI	Tuscola County Jail	ICSolutions	0.21	0.21	3.15
MN	Anoka County Detention Facility	ICSolutions	0.21	0.21	3.15
MN	Olmsted County Sheriff	ICSolutions	0.21	0.21	3.15
MN	Ramsey Workhouse	ICSolutions	0.21	0.21	3.15
MN	Stearns County Jail	ICSolutions	0.21	0.21	3.15
MO	Butler County Sheriff	ICSolutions	0.21	0.21	3.15
MO	Camden County	ICSolutions	0.21	0.21	3.15
MO	Cass County	ICSolutions	0.21	0.21	3.15
MO	Christian County	ICSolutions	0.21	0.21	3.15
MO	Cole County Sheriff	ICSolutions	0.25	0.25	3.75
MO	Dent County Sheriff	ICSolutions	0.21	0.21	3.15
MO	Jackson County	ICSolutions	0.10	0.10	1.50
MO	Laclede County Sheriff	ICSolutions	0.21	0.21	3.15
MO	Marion County Detention Center	ICSolutions	0.21	0.21	3.15
MO	Miller County Sheriff	ICSolutions	0.21	0.21	3.15
MO	Pemiscot County Sheriff	ICSolutions	0.21	0.21	3.15
MO	Platte County Sheriff	ICSolutions	0.25	0.25	3.75
MO	St. Louis County	ICSolutions	0.21	0.21	3.15
MS	Clay County Sheriff	ICSolutions	0.21	0.21	3.15
MS	Department of Corrections – MTC Facilities	ICSolutions	0.11	0.11	1.65
MS	Holmes-Humphreys County	ICSolutions	0.11	0.11	1.65
MS	Lamar County	ICSolutions	0.21	0.21	3.15
MS	Simpson County Sheriff	ICSolutions	0.21	0.21	3.15
MS	Sunflower County	ICSolutions	0.21	0.21	3.15

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MS	Winston County	ICSolutions	0.11	0.11	1.65
MT	Missoula County Sheriff	ICSolutions	0.21	0.21	3.15
MT	Two Rivers Regional Detention Center	ICSolutions	0.21	0.21	3.15
NC	Eastern Band of Cherokee Indians	ICSolutions	0.21	0.21	3.15
NC	Gaston County Sheriff	ICSolutions	0.21	0.21	3.15
NC	Lenoir County	ICSolutions	0.25	0.25	3.75
NE	Lancaster County	ICSolutions	0.21	0.21	3.15
NE	Scotts Bluff County Sheriff	ICSolutions	0.21	0.21	3.15
NH	Department of Corrections – All Locations	ICSolutions	0.05	0.05	0.68
NH	Grafton County	ICSolutions	0.21	0.21	3.15
NH	Hillsborough County	ICSolutions	0.21	0.21	3.15
NM	Otero County Prison Facility – MTC	ICSolutions	0.15	0.15	2.25
NV	Carson City Sheriff	ICSolutions	0.21	0.21	3.15
NV	Clark County	ICSolutions	0.21	0.21	3.15
NV	Department of Corrections – All Locations	ICSolutions	0.11	0.11	1.65
NV	Las Vegas Detention Center	ICSolutions	0.25	0.25	3.75
NY	Erie County Sheriff	ICSolutions	0.21	0.21	3.15
NY	Onondaga Department Of Correction	ICSolutions	0.15	0.15	2.25
NY	Orleans County Correctional Services	ICSolutions	0.21	0.21	3.15
NY	Ulster County Law Enforcement Center	ICSolutions	0.22	0.22	3.30
OH	Coshocton County Sheriff	ICSolutions	0.21	0.21	3.15
OH	Franklin County Community Based Correctional Facility	ICSolutions	0.21	0.21	3.15
OH	Gallia County Sheriff	ICSolutions	0.21	0.21	3.15
OH	Greene County Sheriff	ICSolutions	0.21	0.21	3.15
OH	Highland County Sheriff	ICSolutions	0.21	0.21	3.15
OH	Huron County Sheriff	ICSolutions	0.21	0.21	3.15
OH	Lorain/Medina Community Based Correctional Facility	ICSolutions	0.21	0.21	3.15
OH	Ohio River Valley Corrections Center	ICSolutions	0.21	0.21	3.15
OH	Stark County Sheriff	ICSolutions	0.21	0.21	3.15
OH	Summit County Jail	ICSolutions	0.21	0.21	3.15
OH	Tuscarawas County Sheriff	ICSolutions	0.21	0.21	3.15
OH	Warren County	ICSolutions	0.21	0.21	3.15
OH	Washington County	ICSolutions	0.21	0.21	3.15
OH	West Central Community Correctional Facility	ICSolutions	0.21	0.21	3.15
OK	Rogers County Sheriff	ICSolutions	0.21	0.21	3.15
OR	Douglas County Sheriff	ICSolutions	0.21	0.21	3.15
SC	Beaufort County Detention Center	ICSolutions	0.12	0.12	1.80
SD	Minnehaha County	ICSolutions	0.21	0.21	3.15

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State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
TN	Anderson County Sheriff	ICSolutions	0.31	0.21	3.25
TN	McNairy Sheriff	ICSolutions	0.31	0.21	3.25
TN	Rutherford County Work Release	ICSolutions	0.31	0.21	3.25
TN	Trousdale Turner Correctional Center	ICSolutions	0.11	0.11	1.65
TX	Bexar County Jail	ICSolutions	0.25	0.25	3.75
TX	Calhoun County	ICSolutions	0.21	0.21	3.15
TX	Cameron County	ICSolutions	0.21	0.21	3.15
TX	CARE Montgomery County – GEO	ICSolutions	0.21	0.21	3.15
TX	Correct Care Texas Civil Commitment Center	ICSolutions	0.21	0.21	3.15
TX	Giles W. Dalby Correctional Facility	ICSolutions	0.08	0.08	1.13
TX	Hunt County	ICSolutions	0.21	0.21	3.15
TX	Jackson County Detention Center	ICSolutions	0.21	0.21	3.15
TX	Laredo Processing Center	ICSolutions	0.21	0.21	3.15
TX	Milam County Sheriff	ICSolutions	0.21	0.21	3.15
TX	Nacogdoches County Sheriff	ICSolutions	0.21	0.21	3.15
TX	Nueces County Sheriff	ICSolutions	0.20	0.20	3.00
TX	Palo Pinto County Jail	ICSolutions	0.21	0.21	3.15
TX	TDCJ Facilities – MTC	ICSolutions	0.14	0.14	2.03
TX	Van Zandt County Sheriff	ICSolutions	0.21	0.21	3.15
TX	Webb County	ICSolutions	0.21	0.21	3.15
TX	Willacy Regional Detention Facility – MTC	ICSolutions	0.14	0.14	2.03
TX	Williamson County Sheriff	ICSolutions	0.21	0.21	3.15
UT	Davis County Sheriff	ICSolutions	0.16	0.16	2.40
UT	Department of Corrections – All Locations	ICSolutions	0.19	0.19	2.85
UT	Kane County Sheriff	ICSolutions	0.21	0.21	3.15
UT	Salt Lake County	ICSolutions	0.19	0.19	2.85
VA	Albemarle Charlottesville Regional Jail Authority	ICSolutions	0.16	0.16	2.40
VA	Arlington County	ICSolutions	0.21	0.21	3.15
VA	Chesapeake Sheriff	ICSolutions	0.21	0.21	3.15
VA	Danville Police Department	ICSolutions	0.21	0.21	3.15
VA	Fairfax County Sheriff	ICSolutions	0.14	0.14	2.10
VA	Farmville Regional Jail - ICE	ICSolutions	0.09	0.09	1.35
VA	Middle Peninsula Regional	ICSolutions	0.21	0.21	3.15
VA	Roanoke County	ICSolutions	0.15	0.15	2.25
VA	Southwest Virginia Regional Jail Authority	ICSolutions	0.18	0.18	2.70
VA	Sussex County Jail	ICSolutions	0.21	0.21	3.15
VA	Virginia Peninsula Regional Jail	ICSolutions	0.15	0.15	2.25
VA	Western Virginia Regional Jail Authority	ICSolutions	0.15	0.15	2.25
WA	Yakima City Jail	ICSolutions	0.24	0.24	3.60
WI	Ashland County Jail	ICSolutions	0.21	0.21	3.15

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State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
WI	Calumet County Sheriff	ICSolutions	0.21	0.21	3.15
WI	Clark County Jail	ICSolutions	0.21	0.21	3.15
WI	Dane County Sheriff	ICSolutions	0.21	0.21	3.15
WI	Dodge County	ICSolutions	0.21	0.21	3.15
WI	Door County	ICSolutions	0.21	0.21	3.15
WI	Fond Du Lac County	ICSolutions	0.21	0.21	3.15
WI	Iowa County	ICSolutions	0.21	0.21	3.15
WI	Kewaunee County	ICSolutions	0.21	0.21	3.15
WI	Langlade County	ICSolutions	0.21	0.21	3.15
WI	Marinette County	ICSolutions	0.21	0.21	3.15
WI	Milwaukee County	ICSolutions	0.14	0.14	2.10
WI	Ozaukee County	ICSolutions	0.21	0.21	3.15
WI	Walworth County Sheriff	ICSolutions	0.21	0.21	3.15
WI	Washington County	ICSolutions	0.21	0.21	3.15
WI	Waukesha County	ICSolutions	0.37	0.37	5.55
WI	Waushara County Jail	ICSolutions	0.21	0.21	3.15
WI	Winnebago County Sheriff	ICSolutions	0.21	0.21	3.15
WV	Department of Corrections – All Locations	ICSolutions	0.03	0.03	0.48
WV	McDowell County	ICSolutions	0.03	0.03	0.48
WY	Department of Corrections – All Locations	ICSolutions	0.11	0.11	1.65
WY	Laramie County Sheriff	ICSolutions	0.21	0.21	3.15
AL	Adamsville Police Department	Legacy	0.28	0.28	4.20
AL	Albertville City Police Department	Legacy	0.28	0.28	4.20
AL	Arab City Police Department	Legacy	0.30	0.30	4.50
AL	Daphne City Police Department	Legacy	0.28	0.28	4.20
AL	Dothan Police Department	Legacy	0.28	0.28	4.20
AL	Geneva County Jail	Legacy	0.30	0.30	4.50
AL	Guntersville City Police Department	Legacy	0.30	0.30	4.50
AL	Houston County Jail	Legacy	0.28	0.28	4.20
AL	Montgomery County Detention Center	Legacy	0.30	0.30	4.50
AL	Orange Beach Police Department	Legacy	0.28	0.28	4.20
AR	Izard County Jail	Legacy	1.25	1.25	18.75
AZ	Hualapai Adult Detention Center	Legacy	0.65	0.65	9.75
AZ	White Mountain Apache Corrections Center	Legacy	0.75	0.75	11.25
AZ	Yuma County Detention Center	Legacy	0.40	0.40	6.00
CA	Alhambra Police Department	Legacy	1.15	1.15	17.25
CA	Bell Gardens Police Department	Legacy	0.75	0.75	11.25
CA	Beverly Hills Police Department	Legacy	1.15	1.15	17.25
CA	Buena Park Police Department	Legacy	1.25	1.25	18.75
CA	Burbank Police Department	Legacy	1.15	1.15	17.25

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CA	Chula Vista City Jail	Legacy	1.15	1.15	17.25
CA	Colusa County Jail	Legacy	0.73	0.73	10.95
CA	Corona Police Department	Legacy	1.25	1.25	18.75
CA	Costa Mesa Police Department	Legacy	1.25	1.25	18.75
CA	El Segundo Police Department	Legacy	1.10	1.10	16.50
CA	Fremont Police Department	Legacy	1.15	1.15	17.25
CA	Fresno County Jail	Legacy	0.20	0.20	3.00
CA	Gardena Police Department	Legacy	1.10	1.10	16.50
CA	Glendale Police Department	Legacy	1.25	1.25	18.75
CA	Hawthorne Police Department	Legacy	1.25	1.25	18.75
CA	Hayward Police Department	Legacy	1.25	1.25	18.75
CA	Hermosa Beach Police Department	Legacy	1.25	1.25	18.75
CA	Huntington Beach Police Department	Legacy	0.35	0.35	5.25
CA	Inglewood Police Department	Legacy	1.25	1.25	18.75
CA	Lodi Police Department	Legacy	0.90	0.90	13.50
CA	Long Beach Police Department	Legacy	0.65	0.65	9.75
CA	Manhattan Beach Police Department	Legacy	1.25	1.25	18.75
CA	Mendocino County – All Locations	Legacy	0.45	0.45	6.75
CA	Montebello Police Department	Legacy	0.75	0.75	11.25
CA	Monterey Park Police Department	Legacy	1.15	1.15	17.25
CA	Newport Beach Police Department	Legacy	1.25	1.25	18.75
CA	Pasadena Police Department	Legacy	1.15	1.15	17.25
CA	Redondo Beach Police Department	Legacy	0.95	0.95	14.25
CA	Signal Hill Police Department	Legacy	1.25	1.25	18.75
CA	Tuolumne County Jail	Legacy	0.22	0.22	3.30
CA	Ventura County Sheriff	Legacy	3.99	0.99	18.84
CA	Westminster Police Department	Legacy	1.25	1.25	18.75
CA	Whittier Police Department	Legacy	0.85	0.85	12.75
CA	Yolo County Sheriff	Legacy	9.50	1.49	31.85
CO	Grand County Jail	Legacy	0.50	0.50	7.50
GA	Acworth	Legacy	0.18	0.18	2.70
GA	Coffee County Jail	Legacy	0.19	0.19	2.85
GA	Decatur County Correctional Prison	Legacy	0.19	0.19	2.85
GA	Decatur County Jail	Legacy	0.19	0.19	2.85
ID	Adams County Sheriff	Legacy	0.47	0.47	7.05
ID	Clearwater County Sheriff	Legacy	1.15	1.15	17.25
ID	Lewis County Sheriff	Legacy	1.15	1.15	17.25
IL	Winnebago County Jail	Legacy	0.55	0.55	8.25
IL	Winnebago County Juvenile DC	Legacy	0.55	0.55	8.25
IN	Hammond Police Department	Legacy	0.45	0.45	6.75

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State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
KS	Rooks County Jail	Legacy	1.55	1.55	23.25
LA	Acadia Parish Detention Center	Legacy	0.25	0.25	3.75
LA	Acadia Parish Jail	Legacy	0.25	0.25	3.75
LA	Baker City Police Department	Legacy	0.25	0.25	3.75
LA	Beauregard Parish Jail	Legacy	0.25	0.25	3.75
LA	Christian Acres Juvenile Youth Center	Legacy	0.25	0.25	3.75
LA	Eunice City Jail	Legacy	0.25	0.25	3.75
LA	Leesville City Jail	Legacy	0.25	0.25	3.75
LA	Morgan City Jail	Legacy	0.25	0.25	3.75
LA	Opelousas City Jail	Legacy	0.25	0.25	3.75
LA	Sulphur Police Department	Legacy	0.25	0.25	3.75
LA	Vermilion Parish Sheriff	Legacy	0.25	0.25	3.75
LA	Ville Platte Police Department	Legacy	0.25	0.25	3.75
LA	West Feliciana Parish Jail	Legacy	0.25	0.25	3.75
MA	Boston – All Districts	Legacy	0.20	0.20	3.00
MI	Allen Park Police Department	Legacy	1.05	1.05	15.75
MI	Berkley Police Department	Legacy	1.25	1.25	18.75
MI	Berkley Police Department	Legacy	1.25	1.25	18.75
MI	Beverly Hills Police Department MI	Legacy	1.25	1.25	18.75
MI	Birmingham Police Department	Legacy	1.25	1.25	18.75
MI	Brownstown Police Department	Legacy	1.25	1.25	18.75
MI	Canton Township Police Department	Legacy	1.25	1.25	18.75
MI	Charlevoix County	Legacy	0.35	0.50	7.85
MI	Clinton Township Police Department	Legacy	1.25	1.25	18.75
MI	Crawford County Jail	Legacy	0.35	0.50	7.85
MI	Dearborn Police Department	Legacy	1.25	1.25	18.75
MI	East Lansing Police Department	Legacy	1.25	1.25	18.75
MI	Eastpointe Police Department	Legacy	1.25	1.25	18.75
MI	Ecorse Police Department	Legacy	1.25	1.25	18.75
MI	Farmington Hills Police Department	Legacy	1.25	1.25	18.75
MI	Farmington Police Department	Legacy	0.25	0.25	3.75
MI	Fenton Police Department	Legacy	1.25	1.25	18.75
MI	Ferndale Police Department	Legacy	1.25	1.25	18.75
MI	Garden City Police Department	Legacy	1.25	1.25	18.75
MI	Grosse Pointe Woods	Legacy	1.25	1.25	18.75
MI	Harper Woods Police Department	Legacy	1.25	1.25	18.75
MI	Hazel Park Police Department	Legacy	1.25	1.25	18.75
MI	Huron County Jail	Legacy	0.35	0.50	7.85
MI	Inkster Police Department	Legacy	1.25	1.25	18.75
MI	Kalkaska County Jail	Legacy	0.35	0.50	7.85

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State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
MI	Leelanau County Jail	Legacy	0.35	0.50	7.85
MI	Lincoln Park Police Department	Legacy	1.25	1.25	18.75
MI	Livonia Police Department	Legacy	1.25	1.25	18.75
MI	Madison Heights Police Department	Legacy	1.25	1.25	18.75
MI	Manistee County Jail	Legacy	0.35	0.50	7.85
MI	Milford Police Department	Legacy	1.25	1.25	18.75
MI	Northville Police Department	Legacy	1.25	1.25	18.75
MI	Novi Police Department	Legacy	1.25	1.25	18.75
MI	Plymouth Township Police Department	Legacy	1.25	1.25	18.75
MI	Redford Police Department	Legacy	1.25	1.25	18.75
MI	Rochester Police Department	Legacy	1.25	1.25	18.75
MI	Romulus Police Department	Legacy	1.25	1.25	18.75
MI	Royal Oak Police Department	Legacy	1.25	1.25	18.75
MI	Southfield Police Department	Legacy	1.25	1.25	18.75
MI	Southgate Police Department	Legacy	1.25	1.25	18.75
MI	St. Clair Shores Police Department	Legacy	1.25	1.25	18.75
MI	Sterling Heights Police Department	Legacy	1.25	1.25	18.75
MI	Taylor Police Department	Legacy	1.25	1.25	18.75
MI	Trenton Police Department	Legacy	1.25	1.25	18.75
MI	Troy Police Department	Legacy	1.25	1.25	18.75
MI	Utica Police Department	Legacy	1.25	1.25	18.75
MI	Van Buren Township Police Department	Legacy	1.25	1.25	18.75
MI	Warren Police Department	Legacy	1.25	1.25	18.75
MI	West Bloomfield Police Department	Legacy	1.25	1.25	18.75
MI	Westland Police Department	Legacy	1.25	1.25	18.75
MI	White Lake Police Department	Legacy	1.25	1.25	18.75
MI	Wixom Police Department	Legacy	1.25	1.25	18.75
MI	Wyandotte Police Department	Legacy	1.25	1.25	18.75
MO	Douglas County Sheriff	Legacy	0.85	0.85	12.75
MO	Louisiana Police Department	Legacy	0.60	0.60	9.00
MO	Montgomery County Jail	Legacy	0.75	0.75	11.25
MO	Scott City Police Department	Legacy	0.55	0.55	8.25
MS	Itawamba County Jail	Legacy	0.19	0.19	2.85
MS	Marshall County Sheriff Department	Legacy	0.19	0.19	2.85
MS	Natchez Police Department	Legacy	0.55	0.55	8.25
MS	Tishomingo County Sheriff Department	Legacy	0.19	0.19	2.85
NC	Moore County Detention Center	Legacy	0.55	0.55	8.25
ND	Gerald Fox Adult Detention Center	Legacy	0.75	0.75	11.25
NE	Lancaster Youth Services Center	Legacy	0.50	0.50	7.50
NE	Pierce County Sheriff	Legacy	0.95	0.95	14.25

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State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
NJ	Paterson Police Department	Legacy	0.50	0.50	7.50
NM	Dona Ana County Detention Center	Legacy	0.15	0.15	2.25
NM	Pueblo of Laguna Detention Facility	Legacy	0.15	0.15	2.25
NM	Ramah Navajo Police Department	Legacy	0.15	0.15	2.25
NM	Zuni Department of Corrections	Legacy	0.15	0.15	2.25
NY	Central New York Psychiatric Center	Legacy	0.69	0.69	10.35
OH	Cuyahoga Falls Police Department	Legacy	0.95	0.95	14.25
OH	Middletown Police Department	Legacy	0.95	0.95	14.25
OH	Shelby Police Department	Legacy	0.65	0.65	9.75
OK	Edmond Police Department	Legacy	0.95	0.95	14.25
OK	Lawton City Police Department	Legacy	0.85	0.85	12.75
OK	Okmulgee County Jail	Legacy	0.60	0.60	9.00
OK	Yukon Police Department	Legacy	0.60	0.60	9.00
OR	Benton County Jail	Legacy	1.05	1.05	15.75
OR	Jackson County Main Jail	Legacy	0.35	0.35	5.25
OR	Jackson County Transition Center	Legacy	0.35	0.35	5.25
OR	Josephine County Jail	Legacy	1.05	1.05	15.75
SC	Darlington County Prison Farm	Legacy	0.25	0.25	3.75
SC	McCormick County Sheriff	Legacy	0.55	0.55	8.25
SC	Newberry County Detention Center	Legacy	0.55	0.55	8.25
SD	Rosebud Sioux Tribe Adult Corrections	Legacy	0.65	0.65	9.75
TX	Bedford Police Department	Legacy	1.25	1.25	18.75
TX	Blue Mound Police Department	Legacy	0.90	0.90	13.50
TX	Lewisville	Legacy	1.15	1.15	17.25
TX	The Colony Police Department	Legacy	0.75	0.75	11.25
TX	Walker County Jail	Legacy	0.75	0.75	11.25
TX	West Columbia Police Department	Legacy	1.25	1.25	18.75
VA	Accomack County Sheriff	Legacy	0.35	0.35	5.25
WA	Adams County Sheriff	Legacy	0.95	0.95	14.25
WA	Hoquiam Police Department	Legacy	0.45	0.45	6.75
WA	Lynnwood Jail	Legacy	0.45	0.45	6.75
WA	Whatcom County Jail/ Interim Work Center	Legacy	0.42	0.42	6.30
WA	Whatcom County Juvenile Hall	Legacy	0.42	0.42	6.30
WI	Dunn County Jail	Legacy	1.05	1.05	15.75
WI	Jackson County Jail	Legacy	1.05	1.05	15.75
AL	Bullock County Sheriff Office	Legacy*	3.99	0.99	18.84
AL	Covington County Jail	Legacy*	2.25	0.30	6.75
AL	Foley Police Department	Legacy*	3.25	0.49	10.60
AZ	Colorado River Indian Tribes Detention	Legacy*	0.50	0.75	11.75
CA	Atascadero State Hospital	Legacy*	15.09	1.15	32.34

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CA	Bell Police Department	Legacy*	12.66	0.89	26.01
CA	Clovis Police Department	Legacy*	9.50	1.49	31.85
CA	Metropolitan State Hospital	Legacy*	2.70	0.38	8.40
CA	Napa State Hospital	Legacy*	2.70	0.38	8.40
CA	Patton State Hospital	Legacy*	2.70	0.38	8.40
CA	West Care Foundation	Legacy*	20.00	1.15	37.25
FL	Department of Corrections – Pay Telephones	Legacy*	1.20	0.06	2.10
ID	Clark County Sheriff	Legacy*	3.00	0.69	13.35
IL	McHenry County Jail	Legacy*	3.01	0.25	6.76
LA	Springhill Jail	Legacy*	10.43	0.25	14.18
LA	Vivian Police Department	Legacy*	10.43	0.25	14.18
LA	Welsh Police Department	Legacy*	10.43	0.25	14.18
MA	Everett Police Department-TIPS	Legacy*	11.99	1.29	31.34
MD	Carroll County Detention Center -	Legacy*	3.99	0.99	18.84
MO	Blue Springs Police Department	Legacy*	0.81	0.50	12.15
MO	Chaffee Police Department	Legacy*	3.00	1.55	26.25
MO	De Soto PD	Legacy*	3.00	1.55	26.25
MO	Dixon Police Department	Legacy*	3.00	1.55	26.25
MO	Independence City Jail	Legacy*	1.70	1.55	25.50
MO	Kinloch Police Department	Legacy*	3.00	1.55	26.25
MO	Webb City	Legacy*	3.00	1.55	26.25
NE	Scotts Bluff County Detention Center	Legacy*	2.25	0.30	6.75
NE	Thurston County Jail	Legacy*	3.95	0.69	14.30
NJ	Lindenwold Police Department-TIPS	Legacy*	11.99	1.29	31.34
NJ	Ocean County Juvenile Detention Center	Legacy*	9.78	1.15	27.03
NM	Eunice Police Department	Legacy*	3.99	0.99	18.84
NM	Jal Law Enforcement	Legacy*	3.99	0.99	18.84
NM	Socorro County Detention Center	Legacy*	0.50	0.10	2.00
NY	Greece Town Police Department	Legacy*	2.75	0.30	7.25
NY	Lackawanna Jail	Legacy*	9.66	0.89	23.01
NY	Lancaster Police Department	Legacy*	9.66	0.89	23.01
NY	Niagara Falls Police Department	Legacy*	3.99	0.99	18.84
NY	Town of Evans Police Department	Legacy*	9.66	0.89	23.01
NY	Troy Police Department	Legacy*	3.99	0.99	18.84
NY	West Seneca Police Department	Legacy*	9.66	0.89	23.01
OH	Fostoria Police Department	Legacy*	2.79	0.49	10.14
OK	Anadarko City Jail	Legacy*	2.35	0.95	16.60
OK	Bethany City Jail	Legacy*	2.35	0.95	16.60
OK	Bixby Police Department	Legacy*	2.35	0.95	16.60
OK	Broken Arrow City Jail	Legacy*	2.35	0.95	16.60

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OK	Clinton City Jail	Legacy*	2.35	0.95	16.60
OK	El Reno City Jail	Legacy*	2.35	0.95	16.60
OK	Elk City Police Department	Legacy*	2.35	0.95	16.60
OK	Henryetta City Jail	Legacy*	2.35	0.95	16.60
OK	Locust Grove Police Department	Legacy*	2.35	0.95	16.60
OK	Manford Police Department	Legacy*	2.35	0.95	16.60
OK	Mustang City Jail	Legacy*	2.35	0.35	7.60
OK	Owasso Police Department	Legacy*	2.35	0.95	16.60
OK	Roland City Jail	Legacy*	2.35	0.95	16.60
OK	Seminole City Jail	Legacy*	2.35	0.95	16.60
OK	Tonawa Police Department	Legacy*	2.35	0.95	16.60
OK	Yukon City Jail	Legacy*	2.35	0.95	16.60
PA	Nesbitt Hospital	Legacy*	11.75	0.79	23.60
PA	Wernersville State Hospital	Legacy*	13.09	0.99	27.94
TX	7 Points Police Department	Legacy*	4.75	1.25	23.50
TX	Addison City Jail	Legacy*	4.75	1.25	23.50
TX	Allen City Jail	Legacy*	4.75	1.25	23.50
TX	Angleton City Jail	Legacy*	4.75	1.25	23.50
TX	Aransas Pass City Jail	Legacy*	4.75	1.25	23.50
TX	Armstrong County	Legacy*	4.00	0.75	15.25
TX	Atascosa County	Legacy*	1.50	0.75	12.75
TX	Azle City Jail	Legacy*	4.75	1.25	23.50
TX	Balch Spring Police Department	Legacy*	4.75	1.25	23.50
TX	Bonham City Jail	Legacy*	4.75	1.25	23.50
TX	Brazoria Police Department	Legacy*	4.75	1.25	23.50
TX	Brazos Rehab Place	Legacy*	1.50	0.75	12.75
TX	Cameron County	Legacy*	1.50	0.75	12.75
TX	Cameron County Boot Camp	Legacy*	1.50	0.75	12.75
TX	Cedar Park City Jail	Legacy*	4.75	1.25	23.50
TX	Center Police Department	Legacy*	4.75	1.25	23.50
TX	Childress Police Department	Legacy*	4.75	1.25	23.50
TX	Cleveland City Jail	Legacy*	4.75	1.25	23.50
TX	Cochran County	Legacy*	4.00	0.75	15.25
TX	Cockrell Hill City Jail	Legacy*	4.75	1.25	23.50
TX	Commerce Police Department	Legacy*	4.75	1.25	23.50
TX	Converse Police Department	Legacy*	4.75	1.25	23.50
TX	Crowley Police Department	Legacy*	4.75	1.25	23.50
TX	Dallas Marshall's	Legacy*	4.75	1.25	23.50
TX	Dalworthington Gardens Police Department	Legacy*	4.75	1.25	23.50
TX	Davy Crockett Regional Juvenile Facility	Legacy*	1.50	0.75	12.75

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State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
TX	Denton City Jail	Legacy*	4.75	1.25	23.50
TX	Donely County	Legacy*	4.00	0.75	15.25
TX	Duval County	Legacy*	1.50	0.75	12.75
TX	Electra City Jail	Legacy*	4.75	1.25	23.50
TX	Elsa Police Department	Legacy*	4.75	1.25	23.50
TX	Ennis City Jail	Legacy*	4.75	1.25	23.50
TX	Everman City Jail	Legacy*	4.75	1.25	23.50
TX	Farmers Branch City Jail	Legacy*	4.75	1.25	23.50
TX	Fisher County	Legacy*	4.00	0.75	15.25
TX	Flower Mound Police Department	Legacy*	13.56	1.15	30.81
TX	Forest Hills City Jail	Legacy*	4.75	1.25	23.50
TX	Friendswood Police Department	Legacy*	4.75	1.25	23.50
TX	Frisco	Legacy*	4.75	1.25	23.50
TX	Garland Police Department	Legacy*	4.75	1.25	23.50
TX	Gladewater City Jail	Legacy*	4.75	1.25	23.50
TX	Glenn Heights City Jail	Legacy*	4.75	1.25	23.50
TX	Granbury	Legacy*	1.50	0.75	12.75
TX	GRAPEVINE CITY JAIL	Legacy*	4.75	1.25	23.50
TX	Greenville Police Department	Legacy*	4.75	1.25	23.50
TX	GUN BARREL CITY JAIL	Legacy*	4.75	1.25	23.50
TX	Harlingen Police Department	Legacy*	4.75	1.25	23.50
TX	Hidalgo City Jail	Legacy*	4.75	1.25	23.50
TX	Highland Park City Jail	Legacy*	4.75	1.25	23.50
TX	Highland Village City Jail	Legacy*	4.75	1.25	23.50
TX	Hillsboro City Jail	Legacy*	4.75	1.25	23.50
TX	Hurst Police Department	Legacy*	4.15	0.10	5.65
TX	Hutchins Police Department	Legacy*	4.75	1.25	23.50
TX	INGLESIDE CITY JAIL	Legacy*	4.75	1.25	23.50
TX	JACINTO CITY JAIL	Legacy*	4.75	1.25	23.50
TX	Jacksonville	Legacy*	4.75	1.25	23.50
TX	JCW Default	Legacy*	4.75	1.25	23.50
TX	Jones County	Legacy*	4.00	0.75	15.25
TX	Justice Center PD	Legacy*	13.56	1.15	30.81
TX	Keene City Jail	Legacy*	4.75	1.25	23.50
TX	Kennedale Police Department	Legacy*	4.75	1.25	23.50
TX	Kilgore City Jail	Legacy*	4.75	1.25	23.50
TX	Lake Dallas City Jail	Legacy*	4.75	1.25	23.50
TX	Lake Worth Police Department	Legacy*	4.75	1.25	23.50
TX	Little Elm Police Department	Legacy*	4.75	1.25	23.50
TX	Los Fresnos City Jail	Legacy*	4.75	1.25	23.50

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TX	Midland County JRTC	Legacy*	4.75	1.25	23.50
TX	Mineola City Jail	Legacy*	4.75	1.25	23.50
TX	New Boston City Jail	Legacy*	4.75	1.25	23.50
TX	Oliver Office	Legacy*	3.75	0.40	9.75
TX	Olney City Jail	Legacy*	4.75	1.25	23.50
TX	Palmview Police Department	Legacy*	4.75	1.25	23.50
TX	Pantego City Jail	Legacy*	4.75	1.25	23.50
TX	Pecos Justice Center	Legacy*	13.56	1.15	30.81
TX	RICHARDSON CITY JAIL	Legacy*	4.75	1.25	23.50
TX	River Oaks Police Department	Legacy*	4.75	1.25	23.50
TX	Rockdale Juvenile	Legacy*	1.50	0.75	12.75
TX	Rockdale Police Department	Legacy*	4.75	1.25	23.50
TX	Rowlett Police Department	Legacy*	13.56	1.15	30.81
TX	Saginaw Police Department	Legacy*	4.75	1.25	23.50
TX	Santa Fe City Jail	Legacy*	4.75	1.25	23.50
TX	Seagoville	Legacy*	4.75	1.25	23.50
TX	Shackelford County	Legacy*	4.00	0.75	15.25
TX	Sommerville County Jail	Legacy*	13.56	1.15	30.81
TX	Spring Valley City Jail	Legacy*	4.75	1.25	23.50
TX	Springtown City Jail	Legacy*	4.75	1.25	23.50
TX	Taylor City Jail	Legacy*	4.75	1.25	23.50
TX	Terrell County Jail	Legacy*	13.56	1.15	30.81
TX	Terrell Police Department	Legacy*	4.75	1.25	23.50
TX	Tom Green County	Legacy*	1.50	0.75	12.75
TX	University Park Police Department	Legacy*	4.75	1.25	23.50
TX	Westworth Village Police Department	Legacy*	4.75	1.25	23.50
TX	Whitesboro City Jail	Legacy*	4.75	1.25	23.50
TX	Wilmer Police Department	Legacy*	4.75	1.25	23.50
TX	Wylie City Jail	Legacy*	4.75	1.25	23.50
AL	Barbour County Jail	PayTel	0.21	0.21	3.15
CA	Charlie Byrd Youth Corrections Center	PayTel	0.50	0.50	7.50
CA	Siskiyou County Jail	PayTel	0.50	0.50	7.50
FL	Citrus County Jail	PayTel	0.40	0.40	6.00
FL	Desoto County Jail	PayTel	0.40	0.40	6.00
FL	Flagler County Jail	PayTel	0.40	0.40	6.00
FL	Franklin County Jail	PayTel	0.40	0.40	6.00
FL	Gadsden Co. Correctional Center	PayTel	0.40	0.40	6.00
FL	Holmes County Jail	PayTel	0.40	0.40	6.00
FL	Jefferson County Jail	PayTel	0.20	0.20	3.00
FL	Levy County Jail	PayTel	0.40	0.40	6.00

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FL	St Johns County Jail	PayTel	0.40	0.40	6.00
FL	Wakulla County Detention Facility	PayTel	0.20	0.20	3.00
FL	Washington County Jail	PayTel	0.40	0.40	6.00
GA	Berrien County Jail	PayTel	0.19	0.19	2.85
GA	Bleckley County Jail	PayTel	0.19	0.19	2.85
GA	Burke County	PayTel	0.19	0.19	2.85
GA	Butts County Jail	PayTel	0.19	0.19	2.85
GA	Chatham County	PayTel	0.19	0.19	2.85
GA	Colquitt County Jail	PayTel	0.19	0.19	2.85
GA	Colquitt County Prison	PayTel	0.19	0.19	2.85
GA	Columbia County Jail	PayTel	0.19	0.19	2.85
GA	Coweta County Jail	PayTel	0.19	0.19	2.85
GA	Crisp County Jail	PayTel	0.19	0.19	2.85
GA	Dodge County Jail	PayTel	0.19	0.19	2.85
GA	Dooly County Jail	PayTel	0.19	0.19	2.85
GA	Dougherty County Jail	PayTel	0.19	0.19	2.85
GA	Elbert County Detention Center	PayTel	0.19	0.19	2.85
GA	Emanuel County Jail	PayTel	0.19	0.19	2.85
GA	Forsyth County Jail	PayTel	0.19	0.19	2.85
GA	Franklin County Jail	PayTel	0.19	0.19	2.85
GA	Gilmer County Jail	PayTel	0.19	0.19	2.85
GA	Glynn County Detention Center	PayTel	0.19	0.19	2.85
GA	Gordon County Jail	PayTel	0.19	0.19	2.85
GA	Greene County Jail	PayTel	0.19	0.19	2.85
GA	Haralson County Jail	PayTel	0.19	0.19	2.85
GA	Heard County Jail	PayTel	0.19	0.19	2.85
GA	Houston County Jail	PayTel	0.19	0.19	2.85
GA	Jasper County Jail	PayTel	0.19	0.19	2.85
GA	Jones County Jail	PayTel	0.19	0.19	2.85
GA	Lamar County Jail	PayTel	0.19	0.19	2.85
GA	Laurens County Jail	PayTel	0.19	0.19	2.85
GA	Lumpkin County Jail	PayTel	0.19	0.19	2.85
GA	Madison County Jail	PayTel	0.19	0.19	2.85
GA	McIntosh County Jail	PayTel	0.19	0.19	2.85
GA	Meriwether County Jail	PayTel	0.19	0.19	2.85
GA	Mitchell County Jail	PayTel	0.19	0.19	2.85
GA	Monroe County Jail	PayTel	0.19	0.19	2.85
GA	Morgan County Detention Center	PayTel	0.19	0.19	2.85
GA	Murray County Jail	PayTel	0.19	0.19	2.85
GA	Newton County Jail	PayTel	0.19	0.19	2.85

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GA	Oconee County Jail	PayTel	0.19	0.19	2.85
GA	Peach County Jail	PayTel	0.19	0.19	2.85
GA	Pickens County Jail	PayTel	0.19	0.19	2.85
GA	Pierce County Jail	PayTel	0.19	0.19	2.85
GA	Pulaski County Jail	PayTel	0.19	0.19	2.85
GA	Putnam County Jail	PayTel	0.19	0.19	2.85
GA	Randolph County Jail	PayTel	0.19	0.19	2.85
GA	Schley County Jail	PayTel	0.19	0.19	2.85
GA	Taylor County Jail	PayTel	0.19	0.19	2.85
GA	Telfair County Jail	PayTel	0.19	0.19	2.85
GA	Thomas County Detention Center	PayTel	0.19	0.19	2.85
GA	Toombs County Jail	PayTel	0.19	0.19	2.85
GA	Treutlen County Jail	PayTel	0.19	0.19	2.85
GA	Twiggs County Jail	PayTel	0.19	0.19	2.85
GA	Upson County Jail	PayTel	0.19	0.19	2.85
GA	Walton County Jail	PayTel	0.19	0.19	2.85
GA	Washington County Jail	PayTel	0.19	0.19	2.85
GA	Wayne County Jail	PayTel	0.19	0.19	2.85
GA	White County Jail	PayTel	0.19	0.19	2.85
GA	Whitfield County	PayTel	0.19	0.19	2.85
GA	Worth County	PayTel	0.19	0.19	2.85
KS	Wyandotte County Detention Center	PayTel	0.34	0.34	5.10
MD	Allegany County Detention Center	PayTel	0.40	0.40	6.00
MD	Calvert County Detention Center	PayTel	0.40	0.40	6.00
MD	Garrett County	PayTel	0.40	0.40	6.00
MO	St Charles Department Corrections	PayTel	0.45	0.45	6.75
NC	Alexander County Jail	PayTel	0.40	0.40	6.00
NC	Allegany County Jail	PayTel	0.40	0.40	6.00
NC	Ashe County Detention Center	PayTel	0.40	0.40	6.00
NC	Beaufort County Detention Center	PayTel	0.40	0.40	6.00
NC	Bertie-Martin Regional Jail	PayTel	0.40	0.40	6.00
NC	Burke Catawba District Jail	PayTel	0.40	0.40	6.00
NC	Burke County Jail	PayTel	0.40	0.40	6.00
NC	Carteret County Jail	PayTel	0.40	0.40	6.00
NC	Caswell County Jail	PayTel	0.40	0.40	6.00
NC	Catawba County Jail	PayTel	0.40	0.40	6.00
NC	Chatham County Jail	PayTel	0.40	0.40	6.00
NC	Craven County Jail	PayTel	0.40	0.40	6.00
NC	Currituck County Jail	PayTel	0.40	0.40	6.00
NC	Davidson County Detention	PayTel	0.40	0.40	6.00

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NC	Davie County Jail	PayTel	0.40	0.40	6.00
NC	Duplin County Annex	PayTel	0.40	0.40	6.00
NC	Duplin County Jail	PayTel	0.40	0.40	6.00
NC	Edgecombe County Courthouse	PayTel	0.40	0.40	6.00
NC	Edgecombe County Jail	PayTel	0.40	0.40	6.00
NC	Forsyth County Jail	PayTel	0.40	0.40	6.00
NC	Granville County Jail	PayTel	0.40	0.40	6.00
NC	Greene County Jail	PayTel	0.40	0.40	6.00
NC	Guilford County Greensboro & High Point	PayTel	0.40	0.40	6.00
NC	Guilford County Juvenile Detention	PayTel	0.40	0.40	6.00
NC	Halifax County Jail	PayTel	0.40	0.40	6.00
NC	Harnett County Courthouse	PayTel	0.40	0.40	6.00
NC	Harnett County Jail	PayTel	0.40	0.40	6.00
NC	Hertford County Jail	PayTel	0.40	0.40	6.00
NC	Jones County Jail	PayTel	0.40	0.40	6.00
NC	Lee County Jail	PayTel	0.40	0.40	6.00
NC	Lincoln County Jail	PayTel	0.40	0.40	6.00
NC	McDowell County Detention Center	PayTel	0.40	0.40	6.00
NC	Nash County Jail	PayTel	0.40	0.40	6.00
NC	Northampton County Jail	PayTel	0.40	0.40	6.00
NC	Onslow County Jail	PayTel	0.40	0.40	6.00
NC	Orange County Jail	PayTel	0.40	0.40	6.00
NC	Pamlico County Detention Center	PayTel	0.40	0.40	6.00
NC	Pitt County Jail	PayTel	0.40	0.40	6.00
NC	Polk County Jail	PayTel	0.40	0.40	6.00
NC	Randolph County Jail	PayTel	0.40	0.40	6.00
NC	Robeson County Jail	PayTel	0.40	0.40	6.00
NC	Sampson County Jail	PayTel	0.40	0.40	6.00
NC	Stanly County Jail	PayTel	0.40	0.40	6.00
NC	Stokes County Jail	PayTel	0.40	0.40	6.00
NC	Surry County Jail	PayTel	0.40	0.40	6.00
NC	Vance County Jail	PayTel	0.40	0.40	6.00
NC	Wake County Jail	PayTel	0.40	0.40	6.00
NC	Wake County Jail - Hammond	PayTel	0.40	0.40	6.00
NC	Warren County Jail	PayTel	0.40	0.40	6.00
NC	Washington County Jail	PayTel	0.40	0.40	6.00
NC	Wayne County Annex	PayTel	0.40	0.40	6.00
NC	Wayne County Jail	PayTel	0.40	0.40	6.00
NC	Wilkes County Jail	PayTel	0.40	0.40	6.00
NC	Wilson County Jail	PayTel	0.40	0.40	6.00

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NC	Yadkin County Jail	PayTel	0.40	0.40	6.00
NM	McKinley County Jail	PayTel	0.40	0.40	6.00
NM	McKinley County Juvenile Detention Center	PayTel	0.40	0.40	6.00
OH	Montgomery County – All Locations	PayTel	0.23	0.23	3.45
OH	Seneca County Jail	PayTel	0.24	0.24	3.60
PA	Perry County Prison	PayTel	0.25	0.25	3.75
SC	Anderson City Jail	PayTel	0.40	0.40	6.00
SC	Anderson County Jail	PayTel	0.40	0.40	6.00
SC	Barnwell County Jail	PayTel	0.40	0.40	6.00
SC	Colleton County Jail	PayTel	0.40	0.40	6.00
SC	Dorchester County Jail	PayTel	0.40	0.40	6.00
SC	Florence County Law Enforcement Complex	PayTel	0.40	0.40	6.00
SC	Marion County Jail	PayTel	0.40	0.40	6.00
SC	Marlboro County Detention Center	PayTel	0.40	0.40	6.00
SC	Orangeburg/Calhoun Regional Detention Center	PayTel	0.40	0.40	6.00
SC	Saluda County Jail	PayTel	0.40	0.40	6.00
SC	Williamsburg County Jail	PayTel	0.40	0.40	6.00
SC	York County Prison	PayTel	0.40	0.40	6.00
TN	Meigs County Jail	PayTel	0.40	0.40	6.00
VA	Alleghany/Covington Regional Jail	PayTel	0.40	0.40	6.00
VA	Botetourt County Jail	PayTel	0.40	0.40	6.00
VA	Charlotte County Jail	PayTel	0.40	0.40	6.00
VA	Eastern Regional Jail	PayTel	0.40	0.40	6.00
VA	Fauquier County Jail	PayTel	0.40	0.40	6.00
VA	Franklin County Jail	PayTel	0.40	0.40	6.00
VA	Henry County Jail	PayTel	0.40	0.40	6.00
VA	Martinsville City Jail	PayTel	0.40	0.40	6.00
VA	Page County Jail	PayTel	0.40	0.40	6.00
VA	Pittsylvania County Jail	PayTel	0.40	0.40	6.00
VA	Rappahannock Shenandoah Warren Regional Jail	PayTel	0.25	0.25	3.75
VA	Rockbridge Regional Jail	PayTel	0.40	0.40	6.00
VA	Rockingham Harrisonburg Regional	PayTel	0.21	0.21	3.15
WA	Okanogan County Corrections Center	PayTel	0.45	0.45	6.75
WA	South Correctional Entity	PayTel	0.25	0.25	3.75
AK	Department of Corrections – All Locations	Securus	0.21	0.21	3.15
AR	Arkansas County Jail	Securus	5.35	1.40	24.95
AR	Baxter County Sheriff	Securus	5.35	1.40	24.95
AR	Clay County Jail	Securus	4.85	0.90	17.45
AR	Community Transitional Services - Pine Bluff	Securus	0.20	0.20	3.00

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State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
AR	Conway County Detention Center	Securus	3.50	0.50	10.50
AR	Cross County Jail	Securus	4.85	0.90	17.45
AR	Department of Corrections – All Locations	Securus	3.12	0.12	4.80
AR	Garland County Detention Center	Securus	4.93	0.98	18.65
AR	Greene County Detention Facility	Securus	3.65	0.65	12.75
AR	Johnson County Detention Center	Securus	3.50	0.50	10.50
AR	Lake Village City Jail	Securus	3.90	0.40	9.50
AR	Marion County Jail	Securus	4.64	0.69	14.30
AR	Mississippi County Detention Center	Securus	5.35	1.40	24.95
AR	Nevada County Jail	Securus	5.10	0.90	17.70
AR	Osceola Criminal Justice Center	Securus	4.64	0.69	14.30
AR	Saline County Detention Center	Securus	3.99	0.34	8.75
AR	Sheridan City Detention Center	Securus	5.14	1.19	21.80
AR	White River Regional Juvenile	Securus	4.85	0.90	17.45
AZ	Ak-Chin Police Department	Securus	0.47	0.40	6.07
AZ	Apache County Jail	Securus	0.40	0.40	6.00
AZ	CCA Central Arizona Detention Center	Securus	0.21	0.21	3.15
AZ	CCA Eloy Detention Center	Securus	0.21	0.21	3.15
AZ	CCA Florence Correctional Center	Securus	0.21	0.21	3.15
AZ	CCA Florence Correctional Center (VTDOC)	Securus	0.47	0.10	1.87
AZ	Cochise County - All Locations	Securus	0.47	0.47	7.05
AZ	Greenlee County Sheriff	Securus	0.47	0.47	7.05
AZ	Pinal County	Securus	0.16	0.16	2.40
AZ	Salt River Pima Maricopa Indian Community	Securus	0.15	0.15	2.25
AZ	San Luis Regional Detention Center	Securus	0.21	0.21	3.15
AZ	Yuma County Juvenile Justice Center	Securus	0.47	0.47	7.05
CA	Amador County Jail	Securus	3.30	0.80	14.50
CA	Butte County Jail	Securus	2.67	0.42	8.55
CA	Butte County Juvenile Hall	Securus	2.67	0.42	8.55
CA	Calaveras County Sheriff	Securus	2.91	0.41	8.65
CA	Del Norte County Sheriff	Securus	2.88	0.38	8.20
CA	Fresno County Juvenile Justice Center	Securus	2.55	0.30	6.75
CA	Hemet City Police Department	Securus	2.18	0.95	15.48
CA	Inyo County Jail	Securus	3.22	0.72	13.30
CA	Lassen County Jail – All Locations	Securus	4.08	0.98	17.80
CA	Lompoc City Jail	Securus	3.61	0.51	10.75
CA	Madera County Doc	Securus	3.32	0.57	11.30
CA	Mariposa County Sheriff	Securus	3.79	0.69	13.45
CA	Modoc County Jail	Securus	2.80	0.30	7.00
CA	Mono County Mammoth Lakes Courthouse	Securus	3.79	0.69	13.45

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CA	Mono County Sheriff	Securus	3.79	0.69	13.45
CA	Monterey County Jail	Securus	2.50	0.17	4.88
CA	Monterey County Probation Office	Securus	3.79	0.69	13.45
CA	Monterey County Youth Center	Securus	3.79	0.69	13.45
CA	Napa County DOC	Securus	3.88	0.78	14.80
CA	Napa County Juvenile Probation	Securus	3.88	0.78	14.80
CA	Riverside County – All Locations	Securus	0.14	0.14	2.10
CA	San Benito County Juvenile Department	Securus	4.85	0.90	17.45
CA	San Bernardino County – All Locations	Securus	0.20	0.20	3.00
CA	San Diego County – All Locations	Securus	0.32	0.32	4.80
CA	San Joaquin County Jail	Securus	0.24	0.24	3.60
CA	San Mateo County - Maguire Correctional	Securus	3.84	0.69	13.50
CA	San Mateo County Youth Services Center	Securus	2.50	0.25	6.00
CA	Santa Cruz County Juvenile Hall	Securus	2.75	0.25	6.25
CA	Seal Beach Police Department	Securus	3.50	0.50	10.50
CA	Sutter County Sheriff	Securus	3.31	0.30	7.51
CA	Trinity County Probation	Securus	3.79	0.69	13.45
CA	Trinity County Sheriff	Securus	3.05	0.30	7.25
CA	Volunteers Of America - Los Angeles	Securus	3.79	0.69	13.45
CA	Yuba Sutter Juvenile Hall	Securus	3.50	0.50	10.50
CO	Alamosa County Detention Center	Securus	2.66	0.27	6.44
CO	Arapahoe County Sheriff	Securus	2.60	0.10	4.00
CO	Aurora Municipal Court Administration	Securus	2.92	0.62	11.60
CO	Bent County Jail	Securus	2.60	0.35	7.50
CO	Boulder County Jail	Securus	2.75	0.00	2.75
CO	Broomfield City Jail	Securus	3.02	0.52	10.30
CO	Chaffee County Jail	Securus	3.32	0.43	9.34
CO	Chief Ignacio Justice Center	Securus	4.31	0.56	12.15
CO	Clear Creek County Jail	Securus	2.71	0.17	5.09
CO	Delta County Jail	Securus	2.79	0.30	6.99
CO	Delta County Work Release	Securus	2.79	0.30	6.99
CO	Denver County Jail	Securus	2.55	0.01	2.69
CO	Downtown Detention Center	Securus	2.55	0.01	2.69
CO	Elbert County Jail	Securus	2.90	0.26	6.54
CO	Fremont County Detention Center	Securus	3.08	0.29	7.14
CO	Gunnison County Jail	Securus	2.80	0.15	4.90
CO	Huerfano County Jail	Securus	3.07	0.43	9.09
CO	Jefferson County Sheriff's Booking	Securus	2.53	0.33	7.15
CO	Jefferson County Sheriff's Detention Facility	Securus	2.53	0.33	7.15
CO	Lake County Sheriff	Securus	3.01	0.26	6.65

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CO	Laplata County Jail	Securus	3.00	0.50	10.00
CO	Las Animas County Jail	Securus	2.49	0.10	3.89
CO	Lincoln County Sheriff	Securus	3.04	0.25	6.54
CO	Logan County Jail	Securus	3.02	0.23	6.24
CO	Mesa County Jail	Securus	2.48	0.23	5.70
CO	Mesa County Jail Work Release	Securus	2.48	0.23	5.70
CO	Moffat County Jail	Securus	3.53	0.39	8.99
CO	Montezuma County Jail	Securus	2.97	0.43	8.99
CO	Montrose County Jail	Securus	2.83	0.44	8.99
CO	Morgan County Jail	Securus	2.87	0.23	6.09
CO	Otero County Jail	Securus	2.80	0.40	8.40
CO	Park County Detention Center	Securus	2.96	0.32	7.44
CO	Prowers County Jail	Securus	2.99	0.20	5.79
CO	Pueblo County Detention Center	Securus	2.74	0.24	6.10
CO	Pueblo County Judicial Building	Securus	2.74	0.24	6.10
CO	Rio Grande County Jail	Securus	2.55	0.15	4.65
CO	Routt County Jail	Securus	2.79	0.25	6.29
CO	Saguache County Jail	Securus	3.40	0.51	10.54
CO	Southern Ute Indian Tribe	Securus	2.74	0.20	5.54
CO	Summit County Jail	Securus	3.19	0.44	9.35
CO	Teller County Jail	Securus	2.85	0.31	7.19
CO	Washington County Jail	Securus	3.28	0.39	8.74
CO	Weld County – All Locations	Securus	3.38	0.13	5.20
CT	Department of Corrections – All Locations	Securus	0.25	0.25	3.75
FL	Alachua County Jail	Securus	2.36	0.40	7.96
FL	Baker County Detention Center	Securus	2.13	0.38	7.45
FL	Bradford County Jail	Securus	2.05	0.30	6.25
FL	Broward County – All Locations	Securus	2.05	0.30	6.25
FL	Clay County Jail	Securus	1.98	0.03	2.40
FL	Columbia County Detention Facility	Securus	0.21	0.21	3.15
FL	Department of Corrections – All Locations	Securus	0.14	0.14	2.10
FL	Escambia County Road Prison	Securus	2.53	0.42	8.41
FL	Florida Civil Commitment Center	Securus	1.57	0.22	4.65
FL	Gadsden Correctional Facility - MTC	Securus	0.06	0.06	0.90
FL	Hardee County Jail	Securus	0.35	0.35	5.25
FL	Jackson County Jail	Securus	2.43	0.43	8.45
FL	Lake City Correctional Facility - CCA	Securus	0.12	0.12	1.80
FL	Lake County Detention Center	Securus	2.15	0.40	7.75
FL	Lake County Jail/Sheriff	Securus	2.15	0.40	7.75
FL	Madison County Jail	Securus	2.58	0.22	5.66

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FL	Marion County Jail	Securus	2.14	0.39	7.60
FL	Okaloosa County Department Of Correctional Services	Securus	2.30	0.41	8.04
FL	Palm Beach County Main Detention	Securus	2.10	0.35	7.00
FL	Sarasota County Jail	Securus	0.21	0.21	3.15
FL	Seminole County Jail	Securus	2.99	0.24	6.35
FL	Suwannee County Jail	Securus	2.11	0.36	7.15
FL	Taylor County Jail	Securus	2.27	0.41	8.01
FL	Volusia County Branch Jail	Securus	2.08	0.33	6.70
FL	Volusia County Correctional Facility	Securus	2.08	0.33	6.70
GA	Athens Clarke County Jail	Securus	0.19	0.19	2.85
GA	Athens Clarke Diversion Center	Securus	0.19	0.19	2.85
GA	Atkinson County Jail	Securus	0.19	0.19	2.85
GA	Baldwin County Jail	Securus	0.19	0.19	2.85
GA	Barrow County Sheriff	Securus	0.18	0.18	2.70
GA	Bibb County Annex - G Wing	Securus	0.19	0.19	2.85
GA	Bibb County Main Jail	Securus	0.19	0.19	2.85
GA	Bibb County New Jail	Securus	0.19	0.19	2.85
GA	Brantley County Jail	Securus	0.19	0.19	2.85
GA	Brooks County Jail	Securus	0.19	0.19	2.85
GA	Bryan County Sheriff	Securus	0.19	0.19	2.85
GA	Bulloch County Sheriff	Securus	0.19	0.19	2.85
GA	Carroll County Jail	Securus	0.16	0.16	2.40
GA	Catoosa County Jail	Securus	0.19	0.19	2.85
GA	Chattooga County Jail	Securus	0.19	0.19	2.85
GA	Clarke County Correctional Institution	Securus	0.19	0.19	2.85
GA	Clayton County Detention Center	Securus	0.18	0.18	2.70
GA	Dekalb County Jail	Securus	0.18	0.18	2.70
GA	Dougherty County Jail	Securus	0.19	0.19	2.85
GA	Fannin County Jail	Securus	0.19	0.19	2.85
GA	Fayette County Jail	Securus	0.18	0.18	2.70
GA	Fulton County – All Facilities	Securus	0.18	0.18	2.70
GA	Grady County Jail	Securus	0.19	0.19	2.85
GA	Gwinnett County Sheriff	Securus	0.18	0.18	2.70
GA	Hall County Jail	Securus	0.18	0.18	2.70
GA	Harris County Prison	Securus	0.19	0.19	2.85
GA	Henry County - Annex	Securus	0.18	0.18	2.70
GA	Henry County Jail	Securus	0.18	0.18	2.70
GA	Jackson County Jail	Securus	0.19	0.19	2.85
GA	Jefferson Correctional Institution	Securus	0.19	0.19	2.85
GA	Jefferson County	Securus	0.19	0.19	2.85

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GA	Lincoln County Sheriff	Securus	0.19	0.19	2.85
GA	Macon County Jail	Securus	0.19	0.19	2.85
GA	Marion County Sheriff	Securus	0.19	0.19	2.85
GA	McDuffie County Sheriff	Securus	0.19	0.19	2.85
GA	McRae Correctional Facility – CCA	Securus	0.19	0.19	2.85
GA	Oglethorpe County Jail	Securus	0.19	0.19	2.85
GA	Pike County Sheriff	Securus	0.18	0.18	2.70
GA	Richmond County Correctional Institution	Securus	0.19	0.19	2.85
GA	Rockdale County Sheriff	Securus	0.18	0.18	2.70
GA	Smyrna City Jail	Securus	0.18	0.18	2.70
GA	Stephens County Jail	Securus	0.19	0.19	2.85
GA	Stewart Detention Center – CCA	Securus	0.19	0.19	2.85
GA	Tattnall County Sheriff	Securus	0.19	0.19	2.85
GA	Tift County Law Enforcement Center	Securus	0.19	0.19	2.85
GA	Troup County Jail	Securus	0.19	0.19	2.85
GA	Walker County Sheriff	Securus	0.19	0.19	2.85
GA	Wilkes County Sheriff	Securus	0.19	0.19	2.85
GA	Wilkinson County Sheriff	Securus	0.19	0.19	2.85
IA	Allamakee County Jail	Securus	4.25	0.50	11.25
IA	Appanoose County Jail	Securus	4.00	0.25	7.50
IA	Audubon County Jail	Securus	4.00	0.50	11.00
IA	Bremer County Sheriff	Securus	3.74	0.74	14.10
IA	Cass County Jail	Securus	0.22	0.22	3.30
IA	Cedar County Sheriff	Securus	3.45	0.45	9.75
IA	Clarke County Jail	Securus	3.75	0.25	7.25
IA	Crawford County Jail	Securus	4.00	0.50	11.00
IA	Mahaska County Jail	Securus	3.92	0.32	8.40
IA	Marion County Jail	Securus	3.75	0.25	7.25
IA	Mitchell County Jail	Securus	3.75	0.25	7.25
IA	Monona County Sheriff	Securus	4.00	0.50	11.00
IA	Pocahontas County Jail	Securus	4.00	0.50	11.00
IA	Polk County	Securus	2.60	0.01	2.74
IA	Pottawattamie County Jail	Securus	3.20	0.40	8.80
IA	Story County Jail	Securus	0.25	0.25	3.75
IA	Wapello County Jail	Securus	3.88	0.28	7.80
IA	Webster County Jail	Securus	3.92	0.32	8.40
IA	Woodbury County Jail	Securus	3.95	0.01	4.09
IA	Woodbury County Work Release	Securus	3.95	0.01	4.09
ID	Benewah County Jail	Securus	0.31	0.31	4.65
ID	Custer County Jail	Securus	3.25	0.50	10.25

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ID	Idaho County Jail	Securus	3.25	0.50	10.25
ID	Nez Perce County Jail	Securus	1.75	0.25	5.25
ID	Valley County Jail	Securus	3.46	0.41	9.20
IL	Adams County Jail	Securus	3.93	0.38	9.25
IL	Alton City Police Department	Securus	3.82	0.27	7.60
IL	Bond County Sheriff	Securus	3.91	0.29	7.97
IL	Boone County Jail	Securus	3.65	0.30	7.85
IL	Clark County Jail	Securus	3.66	0.29	7.72
IL	Clay County Jail	Securus	3.81	0.31	8.15
IL	Clinton County Jail	Securus	3.19	0.29	7.25
IL	Collinsville City Police Department	Securus	3.21	0.29	7.27
IL	Cook County Facilities	Securus	0.13	0.13	1.95
IL	Crawford County Jail	Securus	3.65	0.30	7.85
IL	Department of Corrections – All Locations	Securus	3.35	0.02	3.63
IL	Dewitt County Sheriff	Securus	3.65	0.30	7.85
IL	Douglas County Jail	Securus	3.20	0.30	7.40
IL	Ford County Jail	Securus	3.86	0.49	10.72
IL	Fulton County Jail	Securus	3.16	0.26	6.80
IL	Granite City Jail	Securus	3.77	0.27	7.55
IL	Greene County Sheriff	Securus	3.18	0.26	6.82
IL	Grundy County Sheriff	Securus	3.82	0.47	10.40
IL	Henderson County Sheriff	Securus	3.21	0.29	7.27
IL	Henry County Jail	Securus	3.62	0.27	7.40
IL	Iroquois County Jail	Securus	3.66	0.29	7.72
IL	Jackson County Jail	Securus	3.22	0.32	7.70
IL	Jersey County Jail	Securus	3.66	0.29	7.72
IL	Kankakee County Jail	Securus	0.48	0.16	2.72
IL	Kankakee County Jerome Combs Detention	Securus	0.16	0.16	2.40
IL	Kendall County Jail	Securus	3.74	0.39	9.20
IL	Knox County Jail	Securus	0.22	0.22	3.30
IL	Lake County Adult Correctional Facility	Securus	0.18	0.18	2.70
IL	Lawrence County Jail	Securus	3.69	0.32	8.17
IL	Lee County Sheriff Department	Securus	3.26	0.36	8.30
IL	Logan County Jail	Securus	3.25	0.35	8.15
IL	Macon County Jail	Securus	3.16	0.26	6.80
IL	Macoupin County Jail	Securus	3.90	0.30	8.10
IL	Madison County Jail	Securus	3.85	0.35	8.75
IL	Marshall County Sheriff	Securus	4.01	0.51	11.15
IL	Mason County Sheriff	Securus	3.80	0.30	8.00
IL	Massac County Sheriff	Securus	3.24	0.32	7.72

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IL	McDonough County Jail	Securus	3.67	0.32	8.15
IL	Mclean County Jail	Securus	3.95	0.60	12.35
IL	Menard County Jail	Securus	3.80	0.30	8.00
IL	Mercer County Sheriff	Securus	3.66	0.29	7.72
IL	Monroe County Jail	Securus	3.81	0.31	8.15
IL	Morgan County Jail	Securus	3.65	0.30	7.85
IL	Ogle County Jail	Securus	3.90	0.40	9.50
IL	Perry County Jail	Securus	3.19	0.29	7.25
IL	Piatt County Sheriff	Securus	3.84	0.49	10.70
IL	Pike County Jail	Securus	4.31	0.81	15.65
IL	Randolph County Jail	Securus	4.15	0.80	15.35
IL	Richland County Jail	Securus	3.66	0.29	7.72
IL	Rock Island Sheriff	Securus	3.86	0.51	11.00
IL	Saline County Jail	Securus	3.80	0.30	8.00
IL	Shelby County Jail	Securus	3.16	0.26	6.80
IL	St Clair County Jail	Securus	4.23	0.68	13.75
IL	Stark County Jail	Securus	4.01	0.51	11.15
IL	Stephenson County Jail	Securus	3.82	0.32	8.30
IL	Tazewell County Justice Center	Securus	4.00	0.38	9.32
IL	Union County Jail	Securus	3.22	0.32	7.70
IL	Vermilion County Jail	Securus	3.96	0.61	12.50
IL	Warren County Jail	Securus	3.65	0.30	7.85
IL	Washington County Jail	Securus	3.21	0.29	7.27
IL	White County Jail	Securus	4.02	0.52	11.30
IL	Whiteside County Jail	Securus	3.69	0.32	8.17
IL	Will County – All Locations	Securus	3.26	0.29	7.32
IL	Williamson County Jail	Securus	3.22	0.32	7.70
IL	Woodford County Jail	Securus	3.86	0.36	8.90
IN	Allen County Juvenile Justice Center	Securus	0.24	0.24	3.60
IN	Bartholomew County Jail	Securus	0.24	0.24	3.60
IN	Benton County Jail	Securus	3.40	0.40	9.00
IN	Cass-Pulaski Community Corrections	Securus	3.40	0.40	9.00
IN	Daviess County Jail	Securus	3.45	0.45	9.75
IN	Decatur County Jail	Securus	2.41	0.24	5.77
IN	Dekalb County Jail	Securus	0.60	0.60	9.00
IN	Dubois County Security Center	Securus	3.30	0.80	14.50
IN	Elkhart County – All Locations	Securus	0.24	0.24	3.60
IN	Floyd County Jail	Securus	0.24	0.24	3.60
IN	Franklin County Jail	Securus	3.74	0.74	14.10
IN	Gibson County Jail	Securus	3.51	0.51	10.65

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IN	Grant County – All Locations	Securus	0.22	0.22	3.30
IN	Greene County Sheriff	Securus	3.59	0.59	11.85
IN	Hammond City Jail	Securus	3.74	0.74	14.10
IN	Hendricks County Work Release	Securus	0.24	0.24	3.60
IN	Jackson County Sheriff	Securus	3.40	0.40	9.00
IN	Jefferson County Jail	Securus	3.61	0.61	12.15
IN	Johnson County Community Corrections	Securus	0.24	0.24	3.60
IN	Johnson County Sheriff	Securus	0.24	0.24	3.60
IN	Kosciusko County Jail	Securus	0.24	0.24	3.60
IN	Kosciusko County Work Release	Securus	0.24	0.24	3.60
IN	Lagrange County Sheriff	Securus	3.81	0.81	15.15
IN	Laporte County Community Corrections	Securus	0.24	0.24	3.60
IN	Laporte County Jail	Securus	0.24	0.24	3.60
IN	Lawrence County Sheriff	Securus	3.65	0.65	12.75
IN	Madison County Sheriff	Securus	0.22	0.22	3.30
IN	Marion County Juvenile Detention Center	Securus	0.24	0.24	3.60
IN	Montgomery County Sheriff	Securus	3.53	0.53	10.95
IN	Morgan County Jail	Securus	3.81	0.81	15.15
IN	Newton County Jail	Securus	0.68	0.68	10.20
IN	Porter County Sheriff	Securus	0.24	0.24	3.60
IN	Pulaski County Jail	Securus	0.85	0.35	5.75
IN	Putnam County Jail	Securus	3.40	0.40	9.00
IN	Rush County Jail	Securus	3.58	0.58	11.70
IN	Shelby County Sheriff	Securus	3.75	0.75	14.25
IN	Steuben County Jail	Securus	3.57	0.57	11.55
IN	Sullivan County Jail	Securus	3.57	0.57	11.55
IN	Switzerland County Jail	Securus	3.40	0.40	9.00
IN	Tippecanoe County Community Corrections	Securus	0.24	0.24	3.60
IN	Tipton County Jail	Securus	3.40	0.40	9.00
IN	Vigo County Community Correctional Center	Securus	0.24	0.24	3.60
IN	Vigo County Jail	Securus	0.24	0.24	3.60
IN	Wabash County Jail	Securus	3.48	0.48	10.20
IN	Warren County Jail	Securus	3.40	0.40	9.00
IN	Warrick County Sheriff	Securus	3.40	0.40	9.00
IN	White County Jail	Securus	0.79	0.29	4.85
KS	Barton County Jail	Securus	2.69	0.69	12.35
KS	Butler County Corrections	Securus	4.01	0.51	11.15
KS	Dickinson County Jail	Securus	3.85	0.85	15.75
KS	Edwards County Jail	Securus	4.01	0.95	17.31
KS	Elk County Jail	Securus	4.01	0.51	11.15

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KS	Ellsworth County Jail	Securus	3.82	0.36	8.86
KS	Ford County Jail	Securus	5.50	0.83	17.12
KS	Graham County Jail	Securus	4.01	0.51	11.15
KS	Labette County Jail	Securus	4.61	1.01	18.75
KS	Leavenworth Detention Center – CCA	Securus	0.21	0.21	3.15
KS	Lincoln County Jail	Securus	3.45	0.35	8.35
KS	MacPherson County Jail	Securus	5.27	0.85	17.17
KS	Meade County Jail	Securus	4.11	0.51	11.25
KS	Osborne County Jail	Securus	2.13	0.75	12.63
KS	Ottawa County Jail	Securus	3.77	0.77	14.55
KS	Phillips County Jail	Securus	3.36	0.36	8.40
KS	Rice County Law Enforcement Center	Securus	3.00	0.50	10.00
KS	Saline County Jail	Securus	3.93	0.43	9.95
KS	Sedgwick County – All Locations	Securus	1.60	0.10	3.00
KS	Seward County	Securus	5.30	0.88	17.62
KS	Shawnee County Adult Detention Center	Securus	4.00	0.01	4.14
KS	Shawnee County Juvenile Detention Center	Securus	4.00	0.01	4.14
KS	Smith County Jail	Securus	3.35	0.35	8.25
KS	Stevens County Jail	Securus	4.16	0.66	13.40
KS	Sumner County Jail	Securus	2.41	0.41	8.15
KY	Barren County Detention Center	Securus	1.80	0.30	6.00
KY	Big Sandy Regional Detention Center	Securus	3.16	0.41	8.90
KY	Boyd County Detention Center	Securus	2.07	0.32	6.55
KY	Caldwell County Jail	Securus	1.78	0.28	5.70
KY	Carroll County Detention Center	Securus	3.18	0.43	9.20
KY	Clay County Detention Center	Securus	1.85	0.35	6.75
KY	Clinton County Jail	Securus	3.21	0.21	6.15
KY	Community Transitional Services	Securus	1.68	0.18	4.20
KY	Crittenden County Detention Center	Securus	1.87	0.37	7.05
KY	Department of Corrections – All Locations	Securus	0.21	0.21	3.15
KY	Estill County Jail	Securus	1.78	0.28	5.70
KY	Floyd County Detention Center	Securus	1.90	0.40	7.50
KY	Franklin County Fiscal Court	Securus	0.22	0.22	3.30
KY	Hardin County Annex	Securus	1.79	0.29	5.85
KY	Hardin County Detention Center	Securus	1.79	0.29	5.85
KY	Hardin County Restricted Custody Building	Securus	1.79	0.29	5.85
KY	Henderson County Community Services	Securus	3.32	0.57	11.30
KY	Henderson County Detention Center	Securus	3.32	0.57	11.30
KY	Kentucky River Regional Jail	Securus	3.01	0.41	8.75
KY	Leslie County Detention Center	Securus	3.10	0.35	8.00

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State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
KY	Letcher County Jail	Securus	1.89	0.39	7.35
KY	Lewis County Detention Center	Securus	3.08	0.33	7.70
KY	Lexington Fayette Urban Detention	Securus	0.14	0.14	2.10
KY	Logan County Detention Center	Securus	1.92	0.42	7.80
KY	Louisville / Jefferson County Metro Govt – All Locations	Securus	1.73	0.23	4.95
KY	Meade County Jail	Securus	2.95	0.45	9.25
KY	Nelson County Detention Center	Securus	1.82	0.32	6.30
KY	Otter Creek Correctional Center – CCA	Securus	1.70	0.20	4.50
KY	Pulaski County Detention Center	Securus	1.78	0.28	5.70
KY	Rowan County Detention Center	Securus	3.06	0.31	7.40
KY	Scott County Detention Center	Securus	1.87	0.37	7.05
KY	Three Forks Regional Jail	Securus	3.10	0.35	8.00
KY	Warren County Regional Jail	Securus	1.97	0.47	8.55
KY	Woodford County Fiscal Ct	Securus	1.80	0.30	6.00
LA	Berwick City Police Department	Securus	0.25	0.25	3.75
LA	Cedarwood Manor	Securus	0.25	0.25	3.75
LA	Cedarwood Manor Women's	Securus	0.25	0.25	3.75
LA	Department of Corrections – All Locations	Securus	0.21	0.21	3.15
LA	East Carroll Parish Female	Securus	0.16	0.16	2.40
LA	East Carroll Parish Male	Securus	0.16	0.16	2.40
LA	East Carroll Riverbend Detention Phase I	Securus	0.16	0.16	2.40
LA	Jefferson Parish (Gretna)	Securus	0.25	0.25	3.75
LA	Kenner Police Department	Securus	0.25	0.25	3.75
LA	Lafourche Parish – All Locations	Securus	0.25	0.25	3.75
LA	Morehouse Parish – All Locations	Securus	0.25	0.25	3.75
LA	Natchitoches Parish Work Center	Securus	0.25	0.25	3.75
LA	Orleans Parish – All Locations	Securus	0.25	0.25	3.75
LA	Slidell Police Department	Securus	0.25	0.25	3.75
LA	Terrebonne Parish Criminal Justice Complex	Securus	0.25	0.25	3.75
LA	Terrebonne Parish Trustee	Securus	0.25	0.25	3.75
MA	Ash Street Jail & Regional Lock Up	Securus	3.16	0.16	5.40
MA	Barnstable County Corrections Facility	Securus	3.10	0.10	4.50
MA	Berkshire County House Of Corrections	Securus	3.17	0.17	5.55
MA	Berkshire County Jail	Securus	3.17	0.17	5.55
MA	Bristol County Faunce Corner	Securus	3.16	0.16	5.40
MA	Dukes County Jail	Securus	3.10	0.10	4.50
MA	Essex County – All Locations	Securus	2.65	0.15	4.75
MA	Franklin County Jail	Securus	3.21	0.21	6.15
MA	Middlesex Billerica Hoc	Securus	0.21	0.21	3.15
MA	Suffolk County House Of Corrections	Securus	2.95	0.10	4.35

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MA	Suffolk County Jail	Securus	2.95	0.10	4.35
MA	Worcester County Jail	Securus	3.10	0.10	4.50
MD	Dorchester County Detention Center	Securus	0.22	0.22	3.30
MD	Garrett County Sheriff	Securus	0.25	0.25	3.75
MD	Queen Anne\`S County Detention Center	Securus	0.25	0.14	2.21
MD	Talbot County Detention Center	Securus	0.25	0.25	3.75
MD	Worcester County Detention Center	Securus	0.25	0.25	3.75
ME	Androscoggin County Jail	Securus	1.70	0.27	5.48
ME	Cumberland County Jail	Securus	1.48	0.14	3.44
ME	Franklin County Jail	Securus	1.75	0.32	6.23
ME	Hancock County Jail	Securus	1.48	0.14	3.44
ME	Kennebec County Jail	Securus	1.48	0.14	3.44
ME	Knox County Jail	Securus	1.75	0.32	6.23
ME	Oxford County Jail	Securus	1.75	0.32	6.23
ME	Penobscot County Jail	Securus	1.75	0.32	6.23
ME	Piscataquis County Jail	Securus	1.75	0.32	6.23
ME	Waldo County Jail	Securus	1.75	0.32	6.23
ME	Washington County Jail	Securus	1.48	0.14	3.44
ME	York County Jail	Securus	1.75	0.32	6.23
MI	Alcona County Sheriff	Securus	5.11	0.69	14.77
MI	Alger County Sheriff	Securus	5.65	0.69	15.31
MI	Alpena County Jail	Securus	5.26	0.84	17.02
MI	Antrim County Sheriff	Securus	5.33	0.91	18.07
MI	Arenac County Jail	Securus	5.40	0.69	15.06
MI	Baraga County Jail	Securus	5.36	0.69	15.02
MI	Bay County Law Enforcement Center	Securus	5.40	0.69	15.06
MI	Benzie County Sheriff	Securus	5.90	1.19	22.56
MI	Branch County Jail	Securus	5.79	1.08	20.91
MI	Cheboygan County Jail	Securus	5.23	0.81	16.57
MI	Chippewa County Jail	Securus	5.52	0.88	17.84
MI	Clare County Jail	Securus	5.61	1.19	22.27
MI	Clinton County Jail	Securus	5.29	1.05	19.99
MI	Delta County Jail	Securus	5.40	0.69	15.06
MI	Detroit Madison Center	Securus	5.11	0.69	14.77
MI	Dickinson County Jail	Securus	4.16	0.37	9.34
MI	Eaton County Sheriff	Securus	4.93	0.69	14.59
MI	Emmet County Sheriff	Securus	5.25	0.83	16.87
MI	Flint Police Department	Securus	4.64	0.69	14.30
MI	Genesee County Jail	Securus	4.88	0.93	17.90
MI	Gladwin County Jail	Securus	5.40	0.69	15.06

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MI	Gogebic County Sheriff	Securus	5.40	0.69	15.06
MI	Grand Traverse County	Securus	3.62	0.62	12.30
MI	Gratiot County Jail	Securus	5.05	0.82	16.53
MI	Grosse Pointe Park City	Securus	5.40	0.69	15.06
MI	Holland Police Department	Securus	5.40	0.69	15.06
MI	Houghton County Sheriff	Securus	5.40	0.69	15.06
MI	Houghton County Work Release	Securus	5.40	0.69	15.06
MI	Ingham County Correctional Facility	Securus	4.32	0.53	11.74
MI	Ionia County Jail	Securus	4.83	0.88	17.15
MI	Iosco County Sheriff	Securus	4.45	0.45	10.75
MI	Iron County Sheriff	Securus	5.40	0.69	15.06
MI	Isabella County Jail	Securus	5.39	0.97	18.97
MI	Jackson County Chanter Road Facility	Securus	4.93	0.69	14.59
MI	Jackson County Jail	Securus	4.93	0.69	14.59
MI	Kent County Correctional Facility	Securus	4.64	0.69	14.30
MI	Kent County Courthouse Holding	Securus	4.64	0.69	14.30
MI	Lansing Police Department	Securus	4.79	0.25	8.29
MI	Lapeer County Courthouse	Securus	5.31	1.07	20.29
MI	Lapeer County Jail	Securus	5.31	1.07	20.29
MI	Mackinac County Jail	Securus	5.40	0.69	15.06
MI	Marquette County Community Corrections Detention Center	Securus	5.87	1.16	22.11
MI	Marquette Sheriff	Securus	5.87	1.16	22.11
MI	Mason County Jail	Securus	5.40	0.69	15.06
MI	Menominee County Jail	Securus	5.40	0.69	15.06
MI	Midland County Jail	Securus	3.64	0.64	12.60
MI	Missaukee County Sheriff	Securus	5.41	0.99	19.27
MI	Montcalm Sheriff	Securus	5.70	0.99	19.56
MI	Montmorency Sheriff	Securus	5.36	0.69	15.02
MI	Muskegon County Jail	Securus	5.64	0.97	19.22
MI	Newaygo County Jail	Securus	5.14	1.19	21.80
MI	Niles Law Enforcement Complex	Securus	5.40	0.69	15.06
MI	Ogemaw County Jail	Securus	5.47	1.05	20.17
MI	Ontonagon County Jail	Securus	5.65	0.69	15.31
MI	Otsego County Jail	Securus	5.11	0.69	14.77
MI	Ottawa County Jail	Securus	5.39	1.19	22.05
MI	Ottawa County Juvenile Detention Center	Securus	5.14	1.19	21.80
MI	Presque Isle County Jail	Securus	5.65	0.69	15.31
MI	Roscommon County Jail	Securus	5.90	1.19	22.56
MI	Saginaw County Sheriff	Securus	5.73	1.02	20.01
MI	Sanilac County Jail	Securus	8.20	0.01	8.34

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MI	Schoolcraft County Jail	Securus	5.40	0.69	15.06
MI	Shiawassee County Jail	Securus	5.09	0.85	16.99
MI	St Clair County Jail	Securus	5.52	1.10	20.92
MI	St Joseph County Jail	Securus	1.20	0.70	11.00
MI	Van Buren County Jail	Securus	5.90	1.19	22.56
MI	Washtenaw County Sheriff	Securus	5.40	0.69	15.06
MI	Wayne County - Baird Detention Facility	Securus	0.50	0.50	7.50
MI	Wayne County - Dickerson Detention Facility	Securus	0.50	0.50	7.50
MI	Wayne County - Old Wayne County Jail	Securus	0.50	0.50	7.50
MI	Wayne County - Road Patrol Lockup Facility	Securus	0.48	0.48	7.20
MI	Wexford County Jail	Securus	5.87	1.16	22.11
MN	Brooklyn Park Police Department	Securus	3.00	0.25	6.50
MN	Carlton County Jail	Securus	2.10	0.35	7.00
MN	Carver County Jail	Securus	2.10	0.35	7.00
MN	Goodhue Sheriff	Securus	4.17	0.57	12.15
MN	Hennepin County – All Locations	Securus	0.14	0.14	2.10
MN	Many Rivers Juvenile Detention Center	Securus	3.29	0.39	8.75
MN	McLeod County Jail	Securus	4.10	0.50	11.10
MN	Meeker County Jail	Securus	0.25	0.25	3.75
MN	Northwest Regional Corrections Center	Securus	0.21	0.21	3.15
MN	Olmsted County Adult Detention Center	Securus	3.29	0.39	8.75
MN	Ramsey County Law Enforcement Center	Securus	2.15	0.01	2.29
MN	Rice County Jail	Securus	2.10	0.35	7.00
MN	Rice County Jail Annex	Securus	2.10	0.35	7.00
MN	Scott County Jail	Securus	2.26	0.41	8.00
MN	Sherburne County Jail	Securus	2.24	0.39	7.70
MN	Sibley County Jail	Securus	3.00	0.50	10.00
MN	Wadena County Sheriff	Securus	2.15	0.30	6.35
MN	Waseca County Jail	Securus	3.25	0.50	10.25
MN	Washington County Jail	Securus	2.07	0.32	6.55
MO	Arnold City Jail	Securus	3.51	0.66	12.75
MO	Aurora City Police Department	Securus	3.51	0.66	12.75
MO	Berkeley City Police Department	Securus	3.26	0.66	12.50
MO	Boone County Commission	Securus	2.65	0.40	8.25
MO	Cape Girardeau County Jail	Securus	0.61	0.61	9.15
MO	Cape Girardeau Police Department	Securus	3.76	0.66	13.00
MO	Crawford County Jail	Securus	3.91	0.66	13.15
MO	Department of Corrections – All Locations	Securus	0.05	0.05	0.75
MO	Doniphan City Jail	Securus	3.51	0.66	12.75
MO	Ferguson City Police Department	Securus	2.90	0.40	8.50

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MO	Festus City Police Department	Securus	3.26	0.66	12.50
MO	Grundy County Detention Center	Securus	3.76	1.16	20.00
MO	Jefferson County Jail	Securus	0.73	0.73	10.95
MO	Jennings Adult Correctional Facility	Securus	4.01	1.16	20.25
MO	Kansas City Police Dept. – All Locations	Securus	2.65	0.40	8.25
MO	Lee's Summit City Police Department	Securus	3.26	0.66	12.50
MO	Mississippi County Detention Center	Securus	3.82	0.57	11.80
MO	Moline Acres City Police Department	Securus	3.51	0.66	12.75
MO	Monett City Police Department	Securus	3.51	0.66	12.75
MO	Northwoods City Police Department	Securus	3.51	0.66	12.75
MO	Overland City Police Department	Securus	3.51	0.66	12.75
MO	Phelps County Sheriff	Securus	2.89	0.64	11.85
MO	Pike County Detention Center	Securus	2.67	0.42	8.55
MO	Scott County Jail	Securus	3.00	1.00	17.00
MO	Sikeston Department Of Public Safety	Securus	3.51	0.66	12.75
MO	St Francois County Jail	Securus	2.90	0.65	12.00
MO	St Genevieve County Jail	Securus	3.15	0.90	15.75
MO	St Peters Police Department	Securus	3.21	0.45	9.51
MO	Threads Training 2	Securus	0.26	0.26	3.90
MO	Threads Training 3	Securus	0.26	0.26	3.90
MO	Wright County Jail	Securus	3.24	0.74	13.60
MS	Adams County Correctional Center - CCA	Securus	0.21	0.21	3.15
MS	Adams County Jail	Securus	0.50	0.50	7.50
MS	Amite County Jail	Securus	0.50	0.50	7.50
MS	Chickasaw County Jail	Securus	0.50	0.50	7.50
MS	Clarke County Jail	Securus	0.50	0.50	7.50
MS	Copiah County Detention Center	Securus	0.50	0.50	7.50
MS	Desoto County Adult Detention Center	Securus	0.50	0.50	7.50
MS	Desoto County Expansion Facility	Securus	0.50	0.50	7.50
MS	Forrest County Juvenile Detention Center	Securus	0.50	0.50	7.50
MS	Forrest County Regional Jail	Securus	0.50	0.50	7.50
MS	Greene County Jail	Securus	0.50	0.50	7.50
MS	Grenada County Jail	Securus	0.50	0.50	7.50
MS	Hancock County Adult Detention Center	Securus	0.50	0.50	7.50
MS	Harrison County Detention Center	Securus	0.50	0.50	7.50
MS	Humphreys County Jail	Securus	0.50	0.50	7.50
MS	Jackson County Adult Detention Center	Securus	0.50	0.50	7.50
MS	Jasper County Jail	Securus	0.50	0.50	7.50
MS	Jones County Jail	Securus	0.50	0.50	7.50
MS	Jones County Juvenile Detention Center	Securus	0.50	0.50	7.50

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MS	Lafayette County Detention Center	Securus	0.50	0.50	7.50
MS	Lauderdale County Detention Facility	Securus	0.50	0.50	7.50
MS	Leake County Correctional Facility - County	Securus	0.50	0.50	7.50
MS	Leake County Correctional Facility - State	Securus	0.50	0.50	7.50
MS	Leflore County Jail	Securus	0.50	0.50	7.50
MS	Lincoln County Jail	Securus	0.50	0.50	7.50
MS	Lowndes County Adult Detention Center	Securus	0.50	0.50	7.50
MS	Lowndes County Courthouse Holding Cell	Securus	0.50	0.50	7.50
MS	Madison County Detention Center	Securus	0.50	0.50	7.50
MS	Neshoba County Detention Center	Securus	0.50	0.50	7.50
MS	Newton County Jail	Securus	0.50	0.50	7.50
MS	Oktibbeha County Jail	Securus	0.50	0.50	7.50
MS	Oktibbeha County Jail-Trustee Facility	Securus	0.50	0.50	7.50
MS	Panola County Detention Center	Securus	0.50	0.50	7.50
MS	Perry County Jail	Securus	0.50	0.50	7.50
MS	Picayune City Jail	Securus	0.50	0.50	7.50
MS	Pike County Detention Center	Securus	0.50	0.50	7.50
MS	Prentiss County Jail	Securus	0.50	0.50	7.50
MS	Scott County Jail	Securus	0.50	0.50	7.50
MS	Tallahatchie County Correctional – CCA	Securus	0.10	0.10	1.50
MS	Tate County Jail- JSI	Securus	0.50	0.50	7.50
MS	Tippah County Jail - JSI	Securus	0.50	0.50	7.50
MS	Tunica County Sheriff - JSI	Securus	0.50	0.50	7.50
MS	Union County Jail	Securus	0.50	0.50	7.50
MS	Walthall County Jail - JSI	Securus	0.50	0.50	7.50
MS	Warren County Jail	Securus	0.50	0.50	7.50
MS	Warren County Juvenile Facility	Securus	0.50	0.50	7.50
MS	Wayne County Jail	Securus	0.50	0.50	7.50
MS	Webster County Jail	Securus	0.50	0.50	7.50
MS	Yalobusha County Jail	Securus	0.50	0.50	7.50
MT	Anaconda Police Department	Securus	4.59	0.50	11.59
MT	Beaverhead County Jail	Securus	4.59	0.50	11.59
MT	Broadwater County	Securus	3.02	0.12	4.70
MT	Butte Silverbow County Jail	Securus	4.70	0.61	13.24
MT	Cascade County	Securus	4.59	0.64	13.55
MT	Cascade County Adult Detention Center	Securus	4.59	0.64	13.55
MT	CCCS – Nexus	Securus	1.30	0.30	5.50
MT	CCCS – Start	Securus	1.28	0.28	5.20
MT	CCCS – Watch East Treatment Center	Securus	1.34	0.20	4.14
MT	Chippewa Cree Tribal Justice Center	Securus	1.34	0.20	4.14

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MT	Chouteau County Detention Center	Securus	4.55	0.50	11.55
MT	Custer County Jail	Securus	4.78	0.69	14.44
MT	Fallon County Sheriff	Securus	4.64	0.69	14.30
MT	Fergus County Sheriff	Securus	4.45	0.50	11.45
MT	Flathead County Jail	Securus	4.62	0.67	14.00
MT	Hill County Detention Facility	Securus	5.03	0.67	14.41
MT	Jefferson County Detention Facility	Securus	2.99	0.01	3.13
MT	Lake County Detention Facility	Securus	4.59	0.50	11.59
MT	Lewis & Clark County Detention Center	Securus	2.95	0.05	3.65
MT	Lincoln County Jail	Securus	4.78	0.69	14.44
MT	Musselshell County Jail	Securus	4.88	0.69	14.54
MT	Park County Detention Center	Securus	4.74	0.69	14.40
MT	Pondera County Sheriff	Securus	5.30	0.67	14.68
MT	Powell County Sheriff	Securus	1.50	0.67	10.88
MT	Ravalli County Sheriff	Securus	4.59	0.50	11.59
MT	Richland County Sheriff	Securus	4.78	0.69	14.44
MT	Sanders County Jail	Securus	3.10	0.50	10.10
MT	Toole County Jail	Securus	4.55	0.50	11.55
NC	Alamance County Detention Center	Securus	3.09	0.26	6.73
NC	Alamance County Detention Center Annex	Securus	3.09	0.26	6.73
NC	Albemarle District Jail	Securus	2.82	0.24	6.18
NC	Anson County Sheriff	Securus	2.82	0.24	6.18
NC	Avery County Sheriff	Securus	0.22	0.22	3.30
NC	Bladen County Sheriff	Securus	2.62	0.29	6.68
NC	Brunswick County Jail	Securus	2.82	0.24	6.18
NC	Cabarrus County Sheriff	Securus	2.86	0.36	7.90
NC	Caldwell County Detention Center	Securus	2.83	0.33	7.45
NC	Cherokee County Detention Facility	Securus	2.86	0.28	6.78
NC	Chowan County Detention Facility	Securus	2.99	0.31	7.33
NC	Cleveland County Detention Facility	Securus	2.84	0.26	6.48
NC	Cleveland County Jail Annex	Securus	2.84	0.26	6.48
NC	Columbus County Detention Center	Securus	2.91	0.33	7.53
NC	Dare County Detention Center	Securus	2.49	0.24	5.85
NC	Franklin County Detention Center	Securus	1.38	0.01	1.52
NC	Henderson County Detention Center	Securus	2.94	0.36	7.98
NC	Hoke County Detention Center	Securus	2.91	0.33	7.53
NC	Iredell County Annex	Securus	2.90	0.32	7.38
NC	Iredell County Detention Center	Securus	2.90	0.32	7.38
NC	Jackson County Jail	Securus	2.98	0.40	8.58
NC	Johnston County Jail	Securus	1.11	0.06	1.95

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NC	Macon County Detention Center	Securus	2.87	0.29	6.93
NC	Madison County Detention Center	Securus	0.25	0.25	3.75
NC	Montgomery County Sheriff	Securus	2.82	0.24	6.18
NC	New Hanover County Detention Center	Securus	2.80	0.30	7.00
NC	Pender County Jail	Securus	2.60	0.27	6.38
NC	Richmond County Jail	Securus	2.66	0.41	8.40
NC	Rockingham County Jail	Securus	2.94	0.36	7.98
NC	Rowan County Detention Center	Securus	2.94	0.36	7.98
NC	Rowan County Detention Center Annex	Securus	2.94	0.36	7.98
NC	Rutherford County Detention Center	Securus	2.85	0.27	6.63
NC	Scotland County Sheriff	Securus	2.87	0.29	6.93
NC	Union County Jail	Securus	2.55	0.31	6.89
ND	Bismarck Transition Center	Securus	1.17	0.17	3.55
ND	Cass County Sheriff	Securus	3.60	0.60	12.00
ND	Dakota Women's Correctional And Rehabilitation Center	Securus	2.20	0.27	5.98
ND	Department of Corrections – All Locations	Securus	0.08	0.08	1.20
ND	Heart Of America Correctional & Treatment Center	Securus	2.76	0.40	8.36
NE	Adams County Jail	Securus	2.65	0.40	8.25
NE	Dakota County Jail	Securus	2.88	0.63	11.70
NE	Dakota County Jail	Securus	2.88	0.63	11.70
NE	Hall County Doc	Securus	4.74	0.79	15.80
NE	Kimball County Sheriff	Securus	4.16	0.66	13.40
NE	Phelps County Correctional	Securus	4.64	0.69	14.30
NE	Richardson County Jail	Securus	4.16	0.66	13.40
NE	Saunders County Jail	Securus	2.53	0.38	7.85
NE	Washington County Jail	Securus	2.75	0.50	9.75
NH	Belknap County House of Corrections	Securus	2.27	0.30	6.47
NH	Carroll County Department of Corrections	Securus	1.71	0.21	4.65
NH	Cheshire County Department of Corrections	Securus	1.50	0.19	4.16
NH	Coos County House Of Corrections	Securus	2.27	0.30	6.47
NH	Merrimack County Department of Corrections	Securus	1.62	0.07	2.60
NH	Rockingham County Department of Corrections	Securus	2.39	0.42	8.27
NH	Sullivan County Department of Corrections	Securus	1.44	0.19	4.10
NJ	Cape May County Correctional Center	Securus	0.21	0.21	3.15
NJ	Passaic Co Jail - Work Release/Motor Pool	Securus	2.55	0.25	6.05
NJ	Passaic County Jail	Securus	2.55	0.25	6.05
NM	Bernalillo County Metro Detention Center	Securus	0.08	0.08	1.20
NM	Bernalillo County Youth Services Center	Securus	0.08	0.08	1.20

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State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
NM	Chaves County Adult Detention Center	Securus	0.15	0.15	2.25
NM	Cibola County Correctional Center – CCA	Securus	0.15	0.15	2.25
NM	Curry County Detention Center	Securus	0.15	0.15	2.25
NM	De Baca County Detention Center	Securus	0.15	0.15	2.25
NM	Department of Corrections – All Locations	Securus	0.08	0.08	1.20
NM	Eddy County Adult Detention	Securus	0.15	0.15	2.25
NM	Eddy County Adult Women Detention Center	Securus	0.15	0.15	2.25
NM	Grant County Jail	Securus	0.15	0.15	2.25
NM	Guadalupe Correctional Facility - GEO	Securus	0.08	0.08	1.20
NM	Hidalgo County Detention Center	Securus	0.15	0.15	2.25
NM	Hobbs Police Department City Jail	Securus	0.15	0.15	2.25
NM	Lea County Detention Center – GEO	Securus	0.15	0.15	2.25
NM	Lea Hobbs County - GEO	Securus	0.08	0.08	1.20
NM	Lincoln County Detention Center	Securus	0.14	0.14	2.10
NM	Los Alamos Police Department	Securus	0.15	0.15	2.25
NM	NM Women's Correctional Facility – CCA	Securus	0.08	0.08	1.20
NM	Northeastern NM Detention Facility – GEO	Securus	0.08	0.08	1.20
NM	Otero County Jail	Securus	0.15	0.15	2.25
NM	Quay County Detention Center	Securus	0.15	0.15	2.25
NM	Rio Arriba County Detention Facility - JSI	Securus	0.15	0.15	2.25
NM	Roosevelt County Adult Detention Center	Securus	0.15	0.15	2.25
NM	San Juan County Adult Detention Center	Securus	0.15	0.15	2.25
NM	San Miguel County Detention Center	Securus	0.15	0.15	2.25
NM	Sandoval County Detention Center - JSI	Securus	0.12	0.12	1.80
NM	Santa Fe County Adult Detention Facility	Securus	0.08	0.08	1.20
NM	Sierra County Detention	Securus	0.15	0.15	2.25
NM	Taos County Adult Detention Center	Securus	0.15	0.15	2.25
NM	Torrance County Detention Facility – CCA	Securus	0.15	0.15	2.25
NM	Valencia County Detention Center	Securus	0.10	0.10	1.50
NM	Vigil Maldonado Detention Center	Securus	0.15	0.15	2.25
NV	Churchill County Sheriff	Securus	1.49	0.25	4.99
NV	Douglas County - Lake Tahoe Jail	Securus	1.91	0.41	7.65
NV	Douglas County - Minden Jail	Securus	1.91	0.41	7.65
NV	Eureka County Jail	Securus	1.95	0.31	6.29
NV	Henderson Detention Center	Securus	1.87	0.37	7.05
NV	Humboldt County Sheriff	Securus	1.94	0.30	6.14
NV	Lander County Sheriff's	Securus	1.75	0.25	5.25
NV	Lincoln County Jail	Securus	2.04	0.54	9.60
NV	Lyon County Jail	Securus	1.83	0.33	6.45
NV	Mesquite City Police Department	Securus	1.81	0.31	6.15

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NV	Mineral County Sheriff	Securus	1.89	0.25	5.39
NV	Pershing County Sheriff	Securus	1.25	0.25	4.75
NV	Storey County Sheriff	Securus	1.81	0.31	6.15
NV	White Pine County Jail	Securus	1.81	0.31	6.15
NY	Livingston County Jail	Securus	4.82	0.40	10.42
NY	New York City Department of Corrections	Securus	0.50	0.50	1.20
NY	Niagara County Correctional Facility	Securus	4.35	0.40	9.95
NY	North Tonawanda Police Department	Securus	0.50	0.50	7.50
NY	Ontario County Jail	Securus	0.50	0.50	7.50
NY	Suffolk County Jail	Securus	0.50	0.50	7.50
NY	Suffolk County Jail / Yaphank	Securus	0.50	0.50	7.50
OH	Allen County Sheriff	Securus	3.11	0.36	8.15
OH	Ashland County Jail	Securus	3.02	0.27	6.80
OH	Ashtabula City Police Department	Securus	3.11	0.36	8.15
OH	Ashtabula County Jail	Securus	2.55	0.30	6.75
OH	Auglaize County Jail	Securus	3.11	0.36	8.15
OH	Bedford Heights Police Department	Securus	0.35	0.24	3.71
OH	Bedford Police Department	Securus	3.11	0.36	8.15
OH	Belmont County Jail	Securus	3.11	0.36	8.15
OH	Broadview Heights Police Department	Securus	3.11	0.36	8.15
OH	Brown County Adult Detention Center	Securus	3.11	0.36	8.15
OH	Carroll County Sheriff	Securus	3.00	0.25	6.50
OH	Central Ohio Youth Center	Securus	3.11	0.36	8.15
OH	Clark County Jail	Securus	3.11	0.36	8.15
OH	Clark County Juvenile Detention Center	Securus	3.11	0.36	8.15
OH	Clinton County Adult Detention	Securus	3.11	0.36	8.15
OH	Columbiana County Jail	Securus	3.11	0.36	8.15
OH	Columbiana Minimum Security NAC	Securus	3.11	0.36	8.15
OH	Corrections Commission Of NW Ohio	Securus	3.11	0.36	8.15
OH	Crawford County Jail	Securus	3.11	0.36	8.15
OH	Cuyahoga County Juvenile Detention Center	Securus	3.11	0.36	8.15
OH	Darke County Jail	Securus	3.11	0.36	8.15
OH	East Ohio Correctional Center	Securus	3.11	0.36	8.15
OH	Erie County Jail	Securus	3.11	0.36	8.15
OH	Fairborn City Police Department	Securus	3.11	0.36	8.15
OH	Fairfield County – All Locations	Securus	3.11	0.36	8.15
OH	Fayette County Sheriff	Securus	3.11	0.36	8.15
OH	Findlay	Securus	3.11	0.36	8.15
OH	Guernsey County Jail	Securus	3.11	0.36	8.15
OH	Hancock County Sheriff	Securus	3.11	0.36	8.15

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OH	Harrison County Jail	Securus	3.11	0.36	8.15
OH	Holmes County Jail	Securus	3.11	0.36	8.15
OH	Jackson County Correctional	Securus	3.11	0.36	8.15
OH	Knox County Jail	Securus	3.11	0.36	8.15
OH	Lawrence County Jail	Securus	3.11	0.36	8.15
OH	Licking County Justice Center	Securus	3.11	0.36	8.15
OH	Logan County Juvenile Detention Center	Securus	3.11	0.36	8.15
OH	Logan County Sheriff	Securus	3.11	0.36	8.15
OH	Lorain County Correctional Facility	Securus	3.11	0.36	8.15
OH	Lorain Police Department	Securus	3.11	0.36	8.15
OH	Maple Heights Police Department	Securus	3.11	0.36	8.15
OH	Medina County Jail	Securus	3.11	0.36	8.15
OH	Medina County Juvenile Detention Center	Securus	3.11	0.36	8.15
OH	Meigs County Jail	Securus	3.11	0.36	8.15
OH	Mercer County Sheriff	Securus	0.22	0.22	3.30
OH	Miami County Incarceration Facility	Securus	3.11	0.36	8.15
OH	Miami County Jail	Securus	3.11	0.36	8.15
OH	Middleport City Jail	Securus	3.11	0.36	8.15
OH	Morrow County Sheriff	Securus	3.11	0.36	8.15
OH	Multi-County Correctional Center	Securus	3.11	0.36	8.15
OH	Multi-County Juvenile Detention Center	Securus	3.11	0.36	8.15
OH	Noble County Sheriff	Securus	3.11	0.36	8.15
OH	North Central Ohio Rehabilitation	Securus	3.11	0.36	8.15
OH	North Royalton City Police Department	Securus	3.11	0.36	8.15
OH	Northeast Ohio Correctional Center - CCA	Securus	0.21	0.21	3.15
OH	Northwest Community Correctional Center	Securus	3.11	0.36	8.15
OH	Northwest Ohio Juvenile Detention Center	Securus	3.11	0.36	8.15
OH	Ottawa County Detention Facility	Securus	2.90	0.36	7.94
OH	Ottawa County Minimum Security	Securus	2.90	0.36	7.94
OH	Parma Police Department	Securus	3.11	0.36	8.15
OH	Pickaway County Jail	Securus	3.11	0.36	8.15
OH	Portage County Jail	Securus	3.11	0.36	8.15
OH	Portage/Geauga Juvenile Detention Center	Securus	3.11	0.36	8.15
OH	Preble County Jail	Securus	3.11	0.36	8.15
OH	Putnam County Sheriff	Securus	3.11	0.36	8.15
OH	Richland County Community Alternative Center	Securus	2.95	0.20	5.75
OH	Richland County Jail	Securus	3.11	0.36	8.15
OH	Ross County Jail	Securus	3.11	0.36	8.15
OH	Scioto County	Securus	3.11	0.36	8.15
OH	Scioto County Correctional Center	Securus	3.11	0.36	8.15

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OH	Shelby County Sheriff	Securus	2.88	0.36	7.92
OH	Southeast Ohio Regional Jail	Securus	3.11	0.36	8.15
OH	Strongsville Police Department	Securus	2.65	0.15	4.75
OH	Tri County Regional Jail	Securus	3.11	0.36	8.15
OH	Van Wert County Correctional Facility	Securus	3.11	0.36	8.15
OH	Wayne County Discipline & Rehabilitation Center	Securus	3.11	0.36	8.15
OH	Wayne County Jail	Securus	3.11	0.36	8.15
OH	Western Ohio Regional Treatment	Securus	3.11	0.36	8.15
OH	Wood County Jail	Securus	3.11	0.36	8.15
OH	Wyandot County Sheriff	Securus	3.11	0.36	8.15
OK	Cherokee County Jail	Securus	3.60	1.10	19.00
OK	Davis CCA	Securus	3.60	0.11	5.14
OK	Del City Police Department	Securus	3.85	0.01	3.99
OK	Diamondback Correctional Facility – CCA	Securus	0.50	0.50	4.00
OK	Ottawa County Jail	Securus	3.60	0.33	8.22
OK	Sand Springs City Police Department	Securus	3.23	0.22	6.31
OK	Texas County Jail	Securus	3.60	1.10	19.00
OK	Washington County Jail	Securus	3.60	0.80	14.80
OR	Clatsop County Sheriff	Securus	2.43	0.25	5.93
OR	Jefferson County Sheriff	Securus	1.00	0.57	8.98
OR	Klamath County Sheriff	Securus	2.67	0.49	9.53
OR	Multnomah County Detention Center	Securus	0.17	0.17	2.55
OR	Multnomah County Inverness Jail	Securus	0.17	0.17	2.55
OR	Multnomah County Juvenile Department	Securus	0.17	0.17	2.55
OR	Polk County Sheriff	Securus	2.87	0.09	4.13
OR	Union County Sheriff	Securus	2.68	0.25	6.18
PA	Butler County Prison	Securus	2.27	0.27	6.05
PA	Clinton County Correctional Facility	Securus	1.95	0.20	4.75
PA	Columbia County Prison	Securus	1.85	0.20	4.65
PA	Crawford County Correctional Facility	Securus	2.05	0.30	6.25
PA	Department of Corrections – All Locations	Securus	0.06	0.06	0.90
PA	Elk County Jail	Securus	2.20	0.20	5.00
PA	Erie County Community Correctional Facility	Securus	1.88	0.13	3.70
PA	Erie County Prison	Securus	1.88	0.13	3.70
PA	Greene County Prison	Securus	2.15	0.15	4.25
PA	Lancaster County Prison	Securus	0.21	0.21	3.15
PA	Lancaster County Youth Intervention Center	Securus	0.21	0.21	3.15
PA	Monroe County Correctional Facility	Securus	1.95	0.20	4.75
PA	Potter County Jail	Securus	3.78	0.35	8.68
PA	Tioga County Prison	Securus	2.49	0.49	9.35

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PA	Union County Prison	Securus	3.95	0.45	10.25
PA	Warren County Prison	Securus	2.26	0.26	5.90
PA	Wyoming County Correctional Facility	Securus	2.68	0.68	12.20
SC	Abbeville County Detention Center	Securus	2.50	0.40	8.10
SC	Aiken County Detention Center	Securus	2.50	0.40	8.10
SC	Bamberg County Jail	Securus	0.95	0.28	4.87
SC	Cherokee County Jail	Securus	2.50	0.40	8.10
SC	Chesterfield County Detention Center	Securus	2.50	0.40	8.10
SC	Chesterfield County Work Camp	Securus	2.50	0.40	8.10
SC	Clarendon County Jail	Securus	1.25	0.40	6.85
SC	Darlington County Detention Center	Securus	2.50	0.40	8.10
SC	Dillon County Detention Center	Securus	2.50	0.40	8.10
SC	Edgefield County Jail	Securus	2.50	0.40	8.10
SC	Fairfield County Detention Center	Securus	1.15	0.15	3.25
SC	Georgetown County Detention Center	Securus	0.12	0.12	1.80
SC	Greenville County Detention Center	Securus	2.50	0.33	7.12
SC	Greenwood County Jail	Securus	2.50	0.40	8.10
SC	Hampton County Jail	Securus	1.58	0.33	6.20
SC	Hill Finklea Detention Center	Securus	1.50	0.38	6.82
SC	Horry County Detention Center	Securus	2.50	0.40	8.10
SC	Jasper County Detention Center	Securus	2.50	0.40	8.10
SC	Lancaster County Jail	Securus	2.50	0.40	8.10
SC	Laurens County Jail	Securus	2.50	0.40	8.10
SC	Lexington County Jail	Securus	1.75	0.10	3.15
SC	Oconee County Law Enforcement	Securus	2.50	0.40	8.10
SC	Pickens County Detention Facility	Securus	2.50	0.40	8.10
SC	Pickens County Prison	Securus	2.00	0.22	5.08
SC	Rock Hill City Jail	Securus	2.50	0.40	8.10
SC	Sumter County Detention Center	Securus	1.25	0.40	6.85
SC	Union County Jail	Securus	2.50	0.40	8.10
SC	Union County Prison Camp	Securus	2.50	0.40	8.10
SC	York County Jail	Securus	2.50	0.40	8.10
SD	Brown County Jail	Securus	3.28	0.64	12.24
SD	Codington County Jail	Securus	3.61	0.47	10.19
SD	Davison County Jail	Securus	2.14	0.50	9.14
SD	Fall River County Jail	Securus	3.00	0.36	8.04
SD	Pennington County Juvenile	Securus	0.28	0.28	4.20
TN	Bradley County Jail	Securus	1.53	0.13	3.35
TN	Campbell County Jail	Securus	1.89	0.20	4.69
TN	Carroll County Jail	Securus	3.37	0.78	14.29

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TN	Carter County Jail	Securus	3.62	0.58	11.74
TN	Cheatham County Jail	Securus	2.24	0.05	2.94
TN	Chester County Jail	Securus	4.25	0.57	12.23
TN	Cumberland County Justice Center	Securus	1.91	0.22	4.99
TN	Decatur County Justice Complex	Securus	0.31	0.21	3.25
TN	Dekalb County Jail	Securus	2.37	0.27	6.15
TN	Fentress County Justice Center	Securus	3.03	0.43	9.05
TN	Fentress County Sheriff	Securus	3.03	0.43	9.05
TN	Greene County Detention Center	Securus	1.90	0.21	4.84
TN	Greene County Jail Workhouse	Securus	1.90	0.21	4.84
TN	Hamblen County Jail	Securus	4.28	0.60	12.68
TN	Hamilton County Jail	Securus	1.60	0.10	3.00
TN	Hancock County Jail	Securus	1.91	0.22	4.99
TN	Hardeman County Correctional Center – CCA	Securus	0.16	0.16	2.40
TN	Hardin County Sheriff	Securus	2.20	0.10	3.60
TN	Henderson County Detention Center	Securus	2.09	0.15	4.19
TN	Jefferson County Detention Center	Securus	1.76	0.16	4.00
TN	Jefferson County Workhouse	Securus	1.76	0.16	4.00
TN	Johnson City Jail	Securus	4.34	0.66	13.58
TN	Knox County Detention Facility	Securus	2.80	0.01	2.94
TN	Knox County Jail	Securus	2.80	0.01	2.94
TN	Knox County Work Release Center	Securus	2.80	0.01	2.94
TN	Marion County Jail	Securus	0.32	0.22	3.40
TN	McMinn County Justice Center	Securus	1.76	0.16	4.00
TN	Morgan County Jail	Securus	2.29	0.10	3.69
TN	Scott County Jail Building 2	Securus	1.82	0.13	3.64
TN	Sequatchie County Sheriff	Securus	1.81	0.22	4.89
TN	Silverdale Detention Facilities – CCA	Securus	0.31	0.21	3.25
TN	Smith County Jail	Securus	1.87	0.18	4.39
TN	Sullivan Correctional Facility Building 2	Securus	4.17	0.58	12.29
TN	Sullivan County Sheriff	Securus	4.22	0.58	12.34
TN	Sumner County Sheriff And Jail	Securus	2.06	0.02	2.34
TN	Tipton County Jail	Securus	1.89	0.20	4.69
TN	Weakley County Jail	Securus	1.84	0.15	3.94
TN	West Tennessee Detention Facility – CCA	Securus	0.21	0.21	3.15
TN	White County Jail	Securus	0.90	0.30	5.10
TN	Whiteville Correction Facility – CCA	Securus	0.16	0.16	2.40
TX	Andrews County Jail	Securus	2.45	0.01	2.59
TX	Atascosa County Jail	Securus	4.19	0.57	12.17
TX	Bastrop County Jail	Securus	4.62	0.12	6.30

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TX	Bell County Central Jail	Securus	0.21	0.21	3.15
TX	Bell County Loop Jail	Securus	0.21	0.21	3.15
TX	Bensmihen	Securus	0.27	0.27	4.05
TX	Brazoria County Sheriff Jail	Securus	4.16	0.65	13.26
TX	Brownsville Police Department	Securus	3.92	0.41	9.66
TX	Burleson County Jail	Securus	3.99	0.47	10.57
TX	Central Texas Treatment	Securus	5.63	0.68	15.15
TX	Coastal Bend	Securus	5.57	0.62	14.25
TX	Collin County – All Locations	Securus	3.45	0.01	3.59
TX	Collingsworth County Jail	Securus	3.92	0.41	9.66
TX	Comal County Jail	Securus	4.09	0.49	10.95
TX	Cooke County Jail	Securus	3.66	0.64	12.62
TX	Coryell County Sheriff	Securus	4.32	0.70	14.12
TX	Crystal City Correctional Center	Securus	4.90	0.25	8.40
TX	Cypress Creek	Securus	1.65	0.00	1.65
TX	Dallas County – All Locations	Securus	0.24	0.24	3.60
TX	Denton County – All Locations	Securus	0.26	0.26	3.90
TX	Desoto City Jail	Securus	3.91	0.39	9.37
TX	Dover	Securus	0.27	0.27	4.05
TX	Duval County Jail	Securus	3.91	0.39	9.37
TX	Ector County Detention Center	Securus	5.38	0.43	11.40
TX	Ector County Jail – CEC/CiviGenics	Securus	5.38	0.43	11.40
TX	Eden Detention Center – CCA	Securus	0.21	0.21	3.15
TX	Fannin County Jail	Securus	4.86	0.61	13.40
TX	Fannin County Jail	Securus	4.86	0.61	13.40
TX	Farrar	Securus	0.27	0.27	4.05
TX	Fort Bend County Correctional Facility	Securus	0.32	0.32	4.80
TX	Fort Bend County Juvenile Probation	Securus	0.32	0.32	4.80
TX	Grand Prairie Police Department	Securus	5.38	0.53	12.80
TX	Gray County Jail	Securus	5.22	0.27	9.00
TX	Grayson County	Securus	4.35	0.58	12.47
TX	Hale County Sheriff	Securus	5.44	0.49	12.30
TX	Hall County Jail	Securus	0.22	0.22	3.30
TX	Hamilton County Law Enforcement Center	Securus	5.12	0.35	10.02
TX	Harris County – All Locations	Securus	4.03	0.45	10.33
TX	Hays County Juvenile Facility	Securus	0.22	0.22	3.30
TX	Hays County Law Enforcement Center	Securus	5.55	0.60	13.95
TX	Hopkins County Jail	Securus	4.03	0.53	11.45
TX	Hudspeth County Sheriff - JSI	Securus	4.31	0.70	14.11
TX	Irving Police Department	Securus	3.86	0.36	8.90

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TX	Jack County Jail	Securus	5.22	0.27	9.00
TX	Jasper County Law Enforcement Center	Securus	3.93	0.66	13.17
TX	Jim Hogg County	Securus	3.66	0.39	9.12
TX	Kaufman Co. Jail	Securus	3.91	0.39	9.37
TX	Kaufman County Law Enforcement Center	Securus	4.01	0.49	10.87
TX	Kleberg County	Securus	4.69	0.49	11.55
TX	La Salle County Jail	Securus	3.68	0.18	6.20
TX	Lamar County Jail	Securus	3.64	0.62	12.32
TX	Lamb County Jail	Securus	5.50	0.55	13.20
TX	Lasalle Regional Detention Center	Securus	4.24	0.72	14.32
TX	Leboeuf	Securus	0.27	0.27	4.05
TX	Liberty County Jail	Securus	3.91	0.64	12.87
TX	Limestone County Detention Center	Securus	0.21	0.21	3.15
TX	Limestone Old County Jail	Securus	0.21	0.21	3.15
TX	Madison County Sheriff	Securus	4.37	0.85	16.27
TX	Menard County Sheriff	Securus	3.91	0.39	9.37
TX	Mesquite Police Department	Securus	3.86	0.36	8.90
TX	Midlothian City Jail	Securus	4.01	0.39	9.47
TX	Montague County Sheriff – JSI	Securus	5.43	0.48	12.15
TX	Nicholson	Securus	0.27	0.27	4.05
TX	Nolan County Sheriff	Securus	5.61	0.66	14.85
TX	Nueces County Residential Services	Securus	2.11	0.24	5.47
TX	Oldham County Jail	Securus	5.76	0.41	11.50
TX	Plano Police Department	Securus	5.05	0.55	12.75
TX	Princeton Board Room	Securus	1.78	0.28	5.70
TX	Ray D Anderson Community Corrections	Securus	4.42	0.91	17.16
TX	Rockwall County Jail	Securus	0.50	0.50	7.50
TX	Rohr	Securus	0.27	0.27	4.05
TX	Rolling Plains Regional Jail & Detention Center	Securus	0.21	0.21	3.15
TX	San Jacinto County Sheriff	Securus	4.20	0.68	13.72
TX	San Patricio County Jail	Securus	4.03	0.51	11.17
TX	Sandy Creek	Securus	1.65	0.00	1.65
TX	Starr County Jail	Securus	4.15	0.63	12.97
TX	T. Don Hutto Residential Center - CCA	Securus	0.09	0.09	1.35
TX	Tarrant County – All Locations	Securus	3.06	0.01	3.20
TX	Taylor County Substance Abuse Treatment Center	Securus	4.02	0.50	11.02
TX	Texas Department Of Criminal Justice	Securus	0.26	0.26	3.90
TX	Titus County Jail	Securus	4.17	0.65	13.27
TX	Travis County – All Locations	Securus	0.14	0.14	2.10

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Telford does not make its rates available to the public without having to call for each facility – "DNMA."

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
TX	Trinity County Sheriff	Securus	3.91	0.39	9.37
TX	Upshur County Jail	Securus	4.12	0.60	12.52
TX	Uvalde County	Securus	4.41	0.31	8.75
TX	West Texas Detention Facility	Securus	0.21	0.21	3.15
TX	Wichita County Jail Annex	Securus	3.87	0.39	9.33
TX	Willacy County Jail	Securus	4.08	0.56	11.92
TX	Wilson County Jail	Securus	4.25	0.73	14.47
TX	Wise County Sheriff	Securus	4.16	0.64	13.12
TX	Wood County Sheriff Department	Securus	4.33	0.56	12.17
TX	Zavala County Jail	Securus	4.11	0.49	10.97
UT	Beaver County Jail	Securus	3.46	0.20	6.26
UT	Cache County Jail	Securus	0.22	0.22	3.30
UT	Carbon County Jail	Securus	3.30	0.30	7.50
UT	Daggett County Jail	Securus	5.04	0.58	13.16
UT	Davis County Jail	Securus	3.91	0.01	4.05
UT	Emery County Jail	Securus	3.30	0.30	7.50
UT	Garfield County Jail	Securus	3.68	0.47	10.26
UT	Grand County Jail	Securus	3.51	0.30	7.71
UT	Iron County Jail	Securus	3.40	0.18	5.92
UT	Juab County Jail	Securus	3.30	0.30	7.50
UT	Millard County Jail	Securus	4.00	0.79	15.06
UT	San Juan County Jail	Securus	3.46	0.51	10.60
UT	Summit County Jail	Securus	0.25	0.25	3.75
UT	Tooele County Jail	Securus	3.31	0.31	7.65
UT	Utah County Jail	Securus	0.29	0.29	4.35
UT	Wasatch County Jail	Securus	3.40	0.40	9.00
VA	Alexandria Detention Center	Securus	3.50	0.50	10.50
VA	Blue Ridge Regional Jail Authority	Securus	0.23	0.23	3.45
VA	Bristol Virginia City Jail	Securus	3.40	0.40	9.00
VA	Central Virginia Regional Jail	Securus	3.54	0.54	11.10
VA	Hampton City Jail	Securus	3.55	0.55	11.25
VA	Hampton Roads Regional Jail	Securus	0.17	0.17	2.55
VA	Lancaster County Jail	Securus	2.75	0.50	9.75
VA	Lebanon Community Correctional Center	Securus	4.99	0.69	14.65
VA	Newport News City – All Locations	Securus	4.66	0.71	14.60
VA	Newport News City – Juvenile Detention	Securus	4.66	0.71	14.60
VA	Northern Neck Regional Jail	Securus	2.70	0.20	5.50
VA	Patrick County Jail	Securus	2.42	0.35	7.32
VA	Roanoke City Jail	Securus	3.52	0.52	10.80
VA	Southampton County Jail	Securus	0.22	0.22	3.30

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State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
VA	Southampton County Jail Farm	Securus	0.22	0.22	3.30
WA	Aberdeen Police Department	Securus	2.74	0.35	7.64
WA	Asotin County	Securus	2.69	0.30	6.89
WA	Benton Franklin Juvenile Facility	Securus	4.54	0.59	12.80
WA	Clallam County Correctional Facility	Securus	2.44	0.55	10.14
WA	Clallam County Juvenile	Securus	2.05	0.30	6.25
WA	Cowlitz County Jail	Securus	4.73	0.64	13.69
WA	Cowlitz County Juvenile Facility	Securus	2.60	0.35	7.50
WA	Forks City Police Department	Securus	3.30	0.50	10.30
WA	Grandview Police Department	Securus	2.19	0.30	6.39
WA	Island County Jail	Securus	3.47	0.67	12.85
WA	Island County Juvenile Detention Facility	Securus	3.11	0.50	10.11
WA	Kent Corrections Facility	Securus	1.76	0.26	5.40
WA	King County – All Locations	Securus	0.13	0.13	1.95
WA	Kittitas County Sheriff	Securus	4.79	0.70	14.59
WA	Marysville City Jail	Securus	2.37	0.48	9.09
WA	Mason County Jail	Securus	2.37	0.48	9.09
WA	Pierce County Detention Corrections Center	Securus	0.15	0.15	2.25
WA	Pierce County Juvenile Detention Center	Securus	0.15	0.15	2.25
WA	Sunnyside City Police Department	Securus	2.68	0.54	10.24
WA	Toppenish City Jail	Securus	2.74	0.35	7.64
WA	Walla Walla County Jail	Securus	2.89	0.25	6.39
WA	Walla Walla County Juvenile	Securus	2.60	0.35	7.50
WA	Wapato City Jail	Securus	3.35	0.35	8.25
WA	Yakima County Correctional Center	Securus	1.50	0.12	3.18
WA	Yakima County Jail	Securus	1.50	0.12	3.18
WI	Adams County Jail	Securus	5.29	1.17	21.67
WI	Barron County Sheriff Department	Securus	5.37	0.78	16.29
WI	Bayfield County Sheriff	Securus	1.00	0.50	8.00
WI	Brown County Jail / Juvenile Detention Center	Securus	4.67	0.72	14.75
WI	Brown County Work Release Center	Securus	4.67	0.72	14.75
WI	Buffalo County Sheriff	Securus	4.64	0.69	14.30
WI	Chippewa County Sheriff Department	Securus	5.33	0.74	15.69
WI	Columbia County Jail	Securus	5.31	1.19	21.97
WI	Department of Corrections – All Locations	Securus	0.12	0.12	1.80
WI	Eau Claire County Jail	Securus	3.88	0.71	13.82
WI	Eau Claire County Jail - Main	Securus	3.88	0.71	13.82
WI	Florence County Sheriff	Securus	5.11	0.69	14.77
WI	Forest County Jail	Securus	5.36	0.77	16.14
WI	Grant County Sheriff	Securus	4.74	0.79	15.80

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State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
WI	Green County Sheriff	Securus	4.81	0.69	14.47
WI	Green Lake County Jail	Securus	5.36	0.77	16.14
WI	Iron County Sheriff	Securus	5.80	0.95	19.10
WI	Jefferson County Sheriff	Securus	5.36	0.77	16.14
WI	Juneau County Justice Center	Securus	0.12	0.12	1.80
WI	La Crosse County Jail	Securus	4.81	0.69	14.47
WI	Lincoln County Sheriff	Securus	5.19	0.77	15.97
WI	Manitowoc County Jail	Securus	5.35	0.76	15.99
WI	Marathon County Jail	Securus	5.37	0.87	17.55
WI	Marathon County Juvenile Facility	Securus	5.37	0.87	17.55
WI	Monroe County Sheriff	Securus	4.64	0.69	14.30
WI	Oconto County Jail	Securus	4.70	0.70	14.50
WI	Oneida County Jail	Securus	0.12	0.12	1.80
WI	Pierce County Jail	Securus	5.11	0.69	14.77
WI	Polk County Jail	Securus	5.53	1.11	21.07
WI	Portage County Jail	Securus	5.11	0.69	14.77
WI	Price County Jail	Securus	5.61	1.11	21.15
WI	Racine County Jail	Securus	3.60	0.10	5.00
WI	Racine County Juvenile Detention Center	Securus	3.60	0.10	5.00
WI	Rusk County Jail	Securus	1.00	0.50	8.00
WI	Sawyer County Sheriff	Securus	5.11	0.69	14.77
WI	Shawano County Jail	Securus	5.65	1.06	20.49
WI	Shawano County Work Release	Securus	5.65	1.06	20.49
WI	Sheboygan County Detention Center	Securus	3.15	0.48	9.87
WI	Sheboygan County Jail	Securus	3.15	0.48	9.87
WI	Vernon County Sheriff	Securus	4.70	0.75	15.20
WI	Vilas County Sheriff Jail	Securus	5.28	0.69	14.94
WI	Waupaca County Jail	Securus	5.20	0.20	8.00
WV	Division of Juvenile Services – All Locations	Securus	1.70	0.37	6.88
WY	Big Horn County Detention Center	Securus	3.81	0.61	12.35
WY	Converse County Detention Center	Securus	3.55	0.35	8.45
WY	Crook County Detention Facility	Securus	0.22	0.22	3.30
WY	Goshen County Detention Center	Securus	4.20	0.50	11.20
WY	Hot Springs County Detention Center	Securus	3.71	0.76	14.35
WY	Natrona County Detention Center	Securus	3.03	0.46	9.47
WY	Natrona County Juvenile Detention Center	Securus	1.91	0.41	7.65
WY	Park County Detention Center	Securus	3.57	0.37	8.75
WY	Platte County Detention Center	Securus	3.49	0.49	10.35
WY	Sublette County Detention Facility	Securus	3.35	0.35	8.25
WY	Teton County Detention Center	Securus	3.20	0.50	10.20

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WY	Uinta County Detention Center	Securus	3.08	0.53	10.50
WY	Washakie County Jail	Securus	2.90	0.35	7.80
WY	Weston County Detention Center	Securus	3.71	0.76	14.35
AL	Albertville: Police Department	Telmate [#]	DNMA	DNMA	DNMA
AL	Arab Police Department	Telmate [#]	DNMA	DNMA	DNMA
AL	Boaz City Jail	Telmate [#]	DNMA	DNMA	DNMA
AL	Calhoun County Jail	Telmate [#]	DNMA	DNMA	DNMA
AL	Cherokee County Detention Center	Telmate [#]	DNMA	DNMA	DNMA
AL	Colbert County Jail	Telmate [#]	DNMA	DNMA	DNMA
AL	Coosa County Jail	Telmate [#]	DNMA	DNMA	DNMA
AL	Covington County	Telmate [#]	DNMA	DNMA	DNMA
AL	Cullman County Detention Center	Telmate [#]	DNMA	DNMA	DNMA
AL	Dallas County Jail	Telmate [#]	DNMA	DNMA	DNMA
AL	Decatur City Jail	Telmate [#]	DNMA	DNMA	DNMA
AL	Dekalb County Detention Center	Telmate [#]	DNMA	DNMA	DNMA
AL	Etowah County Jail	Telmate [#]	DNMA	DNMA	DNMA
AL	Franklin County Jail	Telmate [#]	DNMA	DNMA	DNMA
AL	Hale County Jail	Telmate [#]	DNMA	DNMA	DNMA
AL	Jackson County Jail	Telmate [#]	DNMA	DNMA	DNMA
AL	Lauderdale County Jail	Telmate [#]	DNMA	DNMA	DNMA
AL	Lee County Detention Facility	Telmate [#]	DNMA	DNMA	DNMA
AL	Marshall County Jail	Telmate [#]	DNMA	DNMA	DNMA
AL	Marshall County Work Release Center	Telmate [#]	DNMA	DNMA	DNMA
AL	Morgan County Jail	Telmate [#]	DNMA	DNMA	DNMA
AL	Randolph County Jail	Telmate [#]	DNMA	DNMA	DNMA
AL	St Clair County Jail	Telmate [#]	DNMA	DNMA	DNMA
AL	Talladega County Jail	Telmate [#]	DNMA	DNMA	DNMA
AL	Walker County Jail	Telmate [#]	DNMA	DNMA	DNMA
AL	Winston County Jail	Telmate [#]	DNMA	DNMA	DNMA
AZ	Coconino County Detention Facility	Telmate [#]	DNMA	DNMA	DNMA
AZ	Florence Service Processing Center	Telmate [#]	DNMA	DNMA	DNMA
AZ	Santa Cruz County Jail	Telmate [#]	DNMA	DNMA	DNMA
CA	Adelanto Detention Center	Telmate [#]	DNMA	DNMA	DNMA
CA	Imperial County Jail	Telmate [#]	DNMA	DNMA	DNMA
CA	Imperial Regional Detention Facility	Telmate [#]	DNMA	DNMA	DNMA
CA	Los Angeles Staging Facility	Telmate [#]	DNMA	DNMA	DNMA
CA	Mesa Verde Detention Facility	Telmate [#]	DNMA	DNMA	DNMA
CA	Nevada County	Telmate [#]	DNMA	DNMA	DNMA
CA	Nevada County - Carl F Bryan Juvenile Hall	Telmate [#]	DNMA	DNMA	DNMA
CA	Otay Mesa Detention Center	Telmate [#]	DNMA	DNMA	DNMA

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State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
CA	Placer County	Telmate [#]	DNMA	DNMA	DNMA
CA	San Mateo County	Telmate [#]	DNMA	DNMA	DNMA
CO	Aurora ICE Processing Center	Telmate [#]	DNMA	DNMA	DNMA
CO	Douglas County	Telmate [#]	DNMA	DNMA	DNMA
CO	Mesa (Trinity)	Telmate [#]	DNMA	DNMA	DNMA
FL	Broward Transitional Center	Telmate [#]	DNMA	DNMA	DNMA
FL	Flagler FL (Trinity)	Telmate [#]	DNMA	DNMA	DNMA
FL	Glades County	Telmate [#]	DNMA	DNMA	DNMA
FL	Hendry County Jail	Telmate [#]	DNMA	DNMA	DNMA
FL	Krome Service Processing Center	Telmate [#]	DNMA	DNMA	DNMA
FL	Walton County	Telmate [#]	DNMA	DNMA	DNMA
GA	Douglas County	Telmate [#]	DNMA	DNMA	DNMA
GA	Effingham County	Telmate [#]	DNMA	DNMA	DNMA
GA	Folkston ICE Processing Center	Telmate [#]	DNMA	DNMA	DNMA
GA	ICE Tertiary Holding Cells Atlanta	Telmate [#]	DNMA	DNMA	DNMA
GA	Miller County Jail	Telmate [#]	DNMA	DNMA	DNMA
GA	Paulding County	Telmate [#]	DNMA	DNMA	DNMA
GA	Seminole County	Telmate [#]	DNMA	DNMA	DNMA
IA	Polk County (Trinity)	Telmate [#]	DNMA	DNMA	DNMA
ID	3B Juvenile Detention Center	Telmate [#]	DNMA	DNMA	DNMA
ID	Ada County Jail	Telmate [#]	DNMA	DNMA	DNMA
ID	Ada County Juvenile Detention Center	Telmate [#]	DNMA	DNMA	DNMA
ID	Bannock County	Telmate [#]	DNMA	DNMA	DNMA
ID	Bingham County	Telmate [#]	DNMA	DNMA	DNMA
ID	Blaine County	Telmate [#]	DNMA	DNMA	DNMA
ID	Bonner County Detention Center	Telmate [#]	DNMA	DNMA	DNMA
ID	Bonneville County	Telmate [#]	DNMA	DNMA	DNMA
ID	Canyon County	Telmate [#]	DNMA	DNMA	DNMA
ID	Caribou County	Telmate [#]	DNMA	DNMA	DNMA
ID	District 1 Juvenile Detention	Telmate [#]	DNMA	DNMA	DNMA
ID	Elmore County	Telmate [#]	DNMA	DNMA	DNMA
ID	Fort Hall	Telmate [#]	DNMA	DNMA	DNMA
ID	Fremont County	Telmate [#]	DNMA	DNMA	DNMA
ID	Gooding County	Telmate [#]	DNMA	DNMA	DNMA
ID	Jefferson County	Telmate [#]	DNMA	DNMA	DNMA
ID	Jerome County	Telmate [#]	DNMA	DNMA	DNMA
ID	Kootenai County Jail	Telmate [#]	DNMA	DNMA	DNMA
ID	Latah County	Telmate [#]	DNMA	DNMA	DNMA
ID	Madison County	Telmate [#]	DNMA	DNMA	DNMA
ID	Mini-Cassia Justice Center	Telmate [#]	DNMA	DNMA	DNMA

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ID	Owyhee County	Telmate [#]	DNMA	DNMA	DNMA
ID	Payette County	Telmate [#]	DNMA	DNMA	DNMA
ID	Power County	Telmate [#]	DNMA	DNMA	DNMA
ID	Shoshone County Jail	Telmate [#]	DNMA	DNMA	DNMA
ID	Southwest Idaho Juvenile Detention Center	Telmate [#]	DNMA	DNMA	DNMA
ID	Twin Falls	Telmate [#]	DNMA	DNMA	DNMA
ID	Washington County	Telmate [#]	DNMA	DNMA	DNMA
IN	Delaware County	Telmate [#]	DNMA	DNMA	DNMA
IN	Hamilton County Jail	Telmate [#]	DNMA	DNMA	DNMA
IN	Hamilton County Work Release	Telmate [#]	DNMA	DNMA	DNMA
IN	Knox County Jail	Telmate [#]	DNMA	DNMA	DNMA
IN	Lake County Jail	Telmate [#]	DNMA	DNMA	DNMA
IN	Lake County Magistrate	Telmate [#]	DNMA	DNMA	DNMA
IN	Marshall County	Telmate [#]	DNMA	DNMA	DNMA
IN	Miami County	Telmate [#]	DNMA	DNMA	DNMA
IN	Monroe County Jail	Telmate [#]	DNMA	DNMA	DNMA
IN	Porter County Jail	Telmate [#]	DNMA	DNMA	DNMA
IN	Vanderburgh County	Telmate [#]	DNMA	DNMA	DNMA
IN	Washington County	Telmate [#]	DNMA	DNMA	DNMA
IN	Whitley County Jail	Telmate [#]	DNMA	DNMA	DNMA
KY	Boyle County Detention Center	Telmate [#]	DNMA	DNMA	DNMA
KY	Carter County Detention Center	Telmate [#]	DNMA	DNMA	DNMA
KY	Christian County Jail	Telmate [#]	DNMA	DNMA	DNMA
KY	Community Transitional Services	Telmate [#]	DNMA	DNMA	DNMA
KY	Harlan County Detention Center	Telmate [#]	DNMA	DNMA	DNMA
KY	Jessamine County Detention Center	Telmate [#]	DNMA	DNMA	DNMA
KY	Laurel County Correctional Center	Telmate [#]	DNMA	DNMA	DNMA
KY	Marion County	Telmate [#]	DNMA	DNMA	DNMA
KY	McCracken County	Telmate [#]	DNMA	DNMA	DNMA
KY	Pulaski County Detention Center	Telmate [#]	DNMA	DNMA	DNMA
LA	Caddo Parish (Trinity)	Telmate [#]	DNMA	DNMA	DNMA
LA	Lafayette Parish Corrections	Telmate [#]	DNMA	DNMA	DNMA
LA	Lasalle Detention Facility	Telmate [#]	DNMA	DNMA	DNMA
LA	Pine Prairie	Telmate [#]	DNMA	DNMA	DNMA
MI	Allegan County Corrections Center	Telmate [#]	DNMA	DNMA	DNMA
MI	Kalamazoo County Jail	Telmate [#]	DNMA	DNMA	DNMA
MI	St Clair (Trinity)	Telmate [#]	DNMA	DNMA	DNMA
MO	Greene County Jail	Telmate [#]	DNMA	DNMA	DNMA
MO	Kirkwood Police Department	Telmate [#]	DNMA	DNMA	DNMA
MO	Wentzville Police Dept	Telmate [#]	DNMA	DNMA	DNMA

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State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
MT	Dawson Correctional Facility (County)	Telmate [#]	DNMA	DNMA	DNMA
MT	Dawson Correctional Facility (State)	Telmate [#]	DNMA	DNMA	DNMA
MT	Gallatin County	Telmate [#]	DNMA	DNMA	DNMA
MT	Montana State Prison	Telmate [#]	DNMA	DNMA	DNMA
MT	Montana Women's Prison	Telmate [#]	DNMA	DNMA	DNMA
MT	Pine Hills Correctional Facility	Telmate [#]	DNMA	DNMA	DNMA
MT	Riverside Correctional Facility	Telmate [#]	DNMA	DNMA	DNMA
MT	Yellowstone County Detention Center	Telmate [#]	DNMA	DNMA	DNMA
NC	Wayne County Jail	Telmate [#]	DNMA	DNMA	DNMA
NE	Buffalo County	Telmate [#]	DNMA	DNMA	DNMA
NE	Sarpy County Jail	Telmate [#]	DNMA	DNMA	DNMA
NJ	Elizabeth Detention Center	Telmate [#]	DNMA	DNMA	DNMA
NM	Otero County Processing Center - ICE	Telmate [#]	DNMA	DNMA	DNMA
NM	San Juan (Trinity)	Telmate [#]	DNMA	DNMA	DNMA
NV	Nye County	Telmate [#]	DNMA	DNMA	DNMA
NY	Albany County Jail	Telmate [#]	DNMA	DNMA	DNMA
NY	Buffalo Federal Detention Center	Telmate [#]	DNMA	DNMA	DNMA
NY	St Lawrence County (Trinity)	Telmate [#]	DNMA	DNMA	DNMA
OK	Beckham County	Telmate [#]	DNMA	DNMA	DNMA
OK	Oklahoma County	Telmate [#]	DNMA	DNMA	DNMA
OR	Baker County	Telmate [#]	DNMA	DNMA	DNMA
OR	Clackamas County	Telmate [#]	DNMA	DNMA	DNMA
OR	Coos County Jail	Telmate [#]	DNMA	DNMA	DNMA
OR	Curry County Jail	Telmate [#]	DNMA	DNMA	DNMA
OR	Department of Corrections – All Locations	Telmate [#]	DNMA	DNMA	DNMA
OR	Deschutes County Adult Jail	Telmate [#]	DNMA	DNMA	DNMA
OR	Lane County	Telmate [#]	DNMA	DNMA	DNMA
OR	Linn County Jail	Telmate [#]	DNMA	DNMA	DNMA
OR	Malheur County	Telmate [#]	DNMA	DNMA	DNMA
OR	Marion County	Telmate [#]	DNMA	DNMA	DNMA
OR	NORCOR Adult Facility	Telmate [#]	DNMA	DNMA	DNMA
OR	Ontario Red Apple Kiosk	Telmate [#]	DNMA	DNMA	DNMA
OR	Tillamook County	Telmate [#]	DNMA	DNMA	DNMA
OR	Umatilla	Telmate [#]	DNMA	DNMA	DNMA
OR	Washington County	Telmate [#]	DNMA	DNMA	DNMA
SC	Chester County Detention Center	Telmate [#]	DNMA	DNMA	DNMA
TN	Bradley (Trinity)	Telmate [#]	DNMA	DNMA	DNMA
TN	Rutherford County	Telmate [#]	DNMA	DNMA	DNMA
TX	Aransas County	Telmate [#]	DNMA	DNMA	DNMA
TX	Austin County	Telmate [#]	DNMA	DNMA	DNMA

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TX	Bandera County	Telmate [#]	DNMA	DNMA	DNMA
TX	Dimmit Co Jail	Telmate [#]	DNMA	DNMA	DNMA
TX	El Paso Processing Center	Telmate [#]	DNMA	DNMA	DNMA
TX	Fayette County	Telmate [#]	DNMA	DNMA	DNMA
TX	Gillespie County Jail	Telmate [#]	DNMA	DNMA	DNMA
TX	Houston Processing Center	Telmate [#]	DNMA	DNMA	DNMA
TX	Karnes County Residential Center	Telmate [#]	DNMA	DNMA	DNMA
TX	Medina County Jail	Telmate [#]	DNMA	DNMA	DNMA
TX	Parker County Jail	Telmate [#]	DNMA	DNMA	DNMA
TX	Port Isabel Detention Center	Telmate [#]	DNMA	DNMA	DNMA
TX	Prairieland Detention Center	Telmate [#]	DNMA	DNMA	DNMA
TX	San Antonio Detention Center	Telmate [#]	DNMA	DNMA	DNMA
TX	South Texas Detention Complex	Telmate [#]	DNMA	DNMA	DNMA
TX	South Texas Family Residential	Telmate [#]	DNMA	DNMA	DNMA
TX	Sutton County Jail	Telmate [#]	DNMA	DNMA	DNMA
TX	Victoria County	Telmate [#]	DNMA	DNMA	DNMA
TX	Victoria Juvenile	Telmate [#]	DNMA	DNMA	DNMA
TX	Webb County Jail	Telmate [#]	DNMA	DNMA	DNMA
UT	Sanpete County	Telmate [#]	DNMA	DNMA	DNMA
UT	Sevier County Jail	Telmate [#]	DNMA	DNMA	DNMA
UT	Uintah County	Telmate [#]	DNMA	DNMA	DNMA
UT	Washington County - Purgatory Correctional	Telmate [#]	DNMA	DNMA	DNMA
UT	Weber UT (Trinity)	Telmate [#]	DNMA	DNMA	DNMA
WA	Benton County Jail	Telmate [#]	DNMA	DNMA	DNMA
WA	Chelan County	Telmate [#]	DNMA	DNMA	DNMA
WA	Clark County	Telmate [#]	DNMA	DNMA	DNMA
WA	Kitsap County	Telmate [#]	DNMA	DNMA	DNMA
WA	Lewis County Jail	Telmate [#]	DNMA	DNMA	DNMA
WA	Nisqually Public Safety Complex	Telmate [#]	DNMA	DNMA	DNMA
WA	Skagit County	Telmate [#]	DNMA	DNMA	DNMA
WA	South Correctional Entity	Telmate [#]	DNMA	DNMA	DNMA
WA	Tacoma Contract Detention Facility	Telmate [#]	DNMA	DNMA	DNMA
WA	Thurston County ARC	Telmate [#]	DNMA	DNMA	DNMA
WI	Rock County	Telmate [#]	DNMA	DNMA	DNMA
WY	Albany County	Telmate [#]	DNMA	DNMA	DNMA
WY	Campbell County	Telmate [#]	DNMA	DNMA	DNMA
WY	Sheridan County	Telmate [#]	DNMA	DNMA	DNMA
WY	Sweetwater Detention Center	Telmate [#]	DNMA	DNMA	DNMA

* Rate Calculator lists "Connection Charge" in addition to per minute rate. 15 Min. Rate = Connection Rate + (15 * Add. Min. Rate).

[#] Telmate does not make its rates available to the public without having to call for each facility – "DNMA."

EXHIBIT B

Intra-State Rates for ICS Providers
(collected November 28 – December 12, 2016)

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
MI	Sanilac County Jail	Securus	8.20	0.01	8.34
MI	Benzie County Sheriff	Securus	5.90	1.19	22.56
MI	Roscommon County Jail	Securus	5.90	1.19	22.56
MI	Van Buren County Jail	Securus	5.90	1.19	22.56
MI	Marquette County Community Corrections Detention Center	Securus	5.87	1.16	22.11
MI	Marquette Sheriff	Securus	5.87	1.16	22.11
MI	Wexford County Jail	Securus	5.87	1.16	22.11
WI	Iron County Sheriff	Securus	5.80	0.95	19.10
MI	Branch County Jail	Securus	5.79	1.08	20.91
TX	Oldham County Jail	Securus	5.76	0.41	11.50
MI	Saginaw County Sheriff	Securus	5.73	1.02	20.01
MI	Montcalm Sheriff	Securus	5.70	0.99	19.56
MI	Alger County Sheriff	Securus	5.65	0.69	15.31
MI	Ontonagon County Jail	Securus	5.65	0.69	15.31
MI	Presque Isle County Jail	Securus	5.65	0.69	15.31
WI	Shawano County Jail	Securus	5.65	1.06	20.49
WI	Shawano County Work Release	Securus	5.65	1.06	20.49
MI	Muskegon County Jail	Securus	5.64	0.97	19.22
TX	Central Texas Treatment	Securus	5.63	0.68	15.15
MI	Clare County Jail	Securus	5.61	1.19	22.27
TX	Nolan County Sheriff	Securus	5.61	0.66	14.85
WI	Price County Jail	Securus	5.61	1.11	21.15
TX	Coastal Bend	Securus	5.57	0.62	14.25
TX	Hays County Law Enforcement Center	Securus	5.55	0.60	13.95
WI	Polk County Jail	Securus	5.53	1.11	21.07
MI	Chippewa County Jail	Securus	5.52	0.88	17.84
MI	St Clair County Jail	Securus	5.52	1.10	20.92
KS	Ford County Jail	Securus	5.50	0.83	17.12
TX	Lamb County Jail	Securus	5.50	0.55	13.20
MI	Ogemaw County Jail	Securus	5.47	1.05	20.17
TX	Hale County Sheriff	Securus	5.44	0.49	12.30
TX	Montague County Sheriff – JSI	Securus	5.43	0.48	12.15
MI	Missaukee County Sheriff	Securus	5.41	0.99	19.27
MI	Arenac County Jail	Securus	5.40	0.69	15.06
MI	Bay County Law Enforcement Center	Securus	5.40	0.69	15.06
MI	Delta County Jail	Securus	5.40	0.69	15.06
MI	Gladwin County Jail	Securus	5.40	0.69	15.06

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
MI	Gogebic County Sheriff	Securus	5.40	0.69	15.06
MI	Grosse Pointe Park City	Securus	5.40	0.69	15.06
MI	Holland Police Department	Securus	5.40	0.69	15.06
MI	Houghton County Sheriff	Securus	5.40	0.69	15.06
MI	Houghton County Work Release	Securus	5.40	0.69	15.06
MI	Iron County Sheriff	Securus	5.40	0.69	15.06
MI	Mackinac County Jail	Securus	5.40	0.69	15.06
MI	Mason County Jail	Securus	5.40	0.69	15.06
MI	Menominee County Jail	Securus	5.40	0.69	15.06
MI	Niles Law Enforcement Complex	Securus	5.40	0.69	15.06
MI	Schoolcraft County Jail	Securus	5.40	0.69	15.06
MI	Washtenaw County Sheriff	Securus	5.40	0.69	15.06
MI	Isabella County Jail	Securus	5.39	0.97	18.97
MI	Ottawa County Jail	Securus	5.39	1.19	22.05
TX	Ector County Detention Center	Securus	5.38	0.43	11.40
TX	Ector County Jail – CEC/CiviGenics	Securus	5.38	0.43	11.40
TX	Grand Prairie Police Department	Securus	5.38	0.53	12.80
WI	Barron County Sheriff Department	Securus	5.37	0.78	16.29
WI	Marathon County Jail	Securus	5.37	0.87	17.55
WI	Marathon County Juvenile Facility	Securus	5.37	0.87	17.55
MI	Baraga County Jail	Securus	5.36	0.69	15.02
MI	Montmorency Sheriff	Securus	5.36	0.69	15.02
WI	Forest County Jail	Securus	5.36	0.77	16.14
WI	Green Lake County Jail	Securus	5.36	0.77	16.14
WI	Jefferson County Sheriff	Securus	5.36	0.77	16.14
AR	Arkansas County Jail	Securus	5.35	1.40	24.95
AR	Baxter County Sheriff	Securus	5.35	1.40	24.95
AR	Mississippi County Detention Center	Securus	5.35	1.40	24.95
WI	Manitowoc County Jail	Securus	5.35	0.76	15.99
MI	Antrim County Sheriff	Securus	5.33	0.91	18.07
WI	Chippewa County Sheriff Department	Securus	5.33	0.74	15.69
MI	Lapeer County Courthouse	Securus	5.31	1.07	20.29
MI	Lapeer County Jail	Securus	5.31	1.07	20.29
WI	Columbia County Jail	Securus	5.31	1.19	21.97
KS	Seward County	Securus	5.30	0.88	17.62
MT	Pondera County Sheriff	Securus	5.30	0.67	14.68
MI	Clinton County Jail	Securus	5.29	1.05	19.99
WI	Adams County Jail	Securus	5.29	1.17	21.67
WI	Vilas County Sheriff Jail	Securus	5.28	0.69	14.94
KS	MacPherson County Jail	Securus	5.27	0.85	17.17
MI	Alpena County Jail	Securus	5.26	0.84	17.02
MI	Emmet County Sheriff	Securus	5.25	0.83	16.87

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
MI	Cheboygan County Jail	Securus	5.23	0.81	16.57
TX	Gray County Jail	Securus	5.22	0.27	9.00
TX	Jack County Jail	Securus	5.22	0.27	9.00
WI	Waupaca County Jail	Securus	5.20	0.20	8.00
WI	Lincoln County Sheriff	Securus	5.19	0.77	15.97
AR	Sheridan City Detention Center	Securus	5.14	1.19	21.80
MI	Newaygo County Jail	Securus	5.14	1.19	21.80
MI	Ottawa County Juvenile Detention Center	Securus	5.14	1.19	21.80
TX	Hamilton County Law Enforcement Center	Securus	5.12	0.35	10.02
MI	Alcona County Sheriff	Securus	5.11	0.69	14.77
MI	Detroit Madison Center	Securus	5.11	0.69	14.77
MI	Otsego County Jail	Securus	5.11	0.69	14.77
WI	Florence County Sheriff	Securus	5.11	0.69	14.77
WI	Pierce County Jail	Securus	5.11	0.69	14.77
WI	Portage County Jail	Securus	5.11	0.69	14.77
WI	Sawyer County Sheriff	Securus	5.11	0.69	14.77
AR	Nevada County Jail	Securus	5.10	0.90	17.70
MI	Shiawassee County Jail	Securus	5.09	0.85	16.99
MI	Gratiot County Jail	Securus	5.05	0.82	16.53
TX	Plano Police Department	Securus	5.05	0.55	12.75
UT	Daggett County Jail	Securus	5.04	0.58	13.16
MT	Hill County Detention Facility	Securus	5.03	0.67	14.41
VA	Lebanon Community Correctional Center	Securus	4.99	0.69	14.65
AR	Garland County Detention Center	Securus	4.93	0.98	18.65
MI	Eaton County Sheriff	Securus	4.93	0.69	14.59
MI	Jackson County Chanter Road Facility	Securus	4.93	0.69	14.59
MI	Jackson County Jail	Securus	4.93	0.69	14.59
TX	Crystal City Correctional Center	Securus	4.90	0.25	8.40
MI	Genesee County Jail	Securus	4.88	0.93	17.90
MT	Musselshell County Jail	Securus	4.88	0.69	14.54
TX	Fannin County Jail	Securus	4.86	0.61	13.40
TX	Fannin County Jail	Securus	4.86	0.61	13.40
AR	Clay County Jail	Securus	4.85	0.90	17.45
AR	Cross County Jail	Securus	4.85	0.90	17.45
AR	White River Regional Juvenile	Securus	4.85	0.90	17.45
CA	San Benito County Juvenile Department	Securus	4.85	0.90	17.45
MI	Ionia County Jail	Securus	4.83	0.88	17.15
NY	Livingston County Jail	Securus	4.82	0.40	10.42
WI	Green County Sheriff	Securus	4.81	0.69	14.47
WI	La Crosse County Jail	Securus	4.81	0.69	14.47
MI	Lansing Police Department	Securus	4.79	0.25	8.29
WA	Kittitas County Sheriff	Securus	4.79	0.70	14.59

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
MT	Custer County Jail	Securus	4.78	0.69	14.44
MT	Lincoln County Jail	Securus	4.78	0.69	14.44
MT	Richland County Sheriff	Securus	4.78	0.69	14.44
MT	Park County Detention Center	Securus	4.74	0.69	14.40
NE	Hall County Doc	Securus	4.74	0.79	15.80
WI	Grant County Sheriff	Securus	4.74	0.79	15.80
WA	Cowlitz County Jail	Securus	4.73	0.64	13.69
MT	Butte Silverbow County Jail	Securus	4.70	0.61	13.24
WI	Oconto County Jail	Securus	4.70	0.70	14.50
WI	Vernon County Sheriff	Securus	4.70	0.75	15.20
TX	Kleberg County	Securus	4.69	0.49	11.55
WI	Brown County Jail / Juvenile Detention Center	Securus	4.67	0.72	14.75
WI	Brown County Work Release Center	Securus	4.67	0.72	14.75
VA	Newport News City – All Locations	Securus	4.66	0.71	14.60
VA	Newport News City – Juvenile Detention	Securus	4.66	0.71	14.60
AR	Marion County Jail	Securus	4.64	0.69	14.30
AR	Osceola Criminal Justice Center	Securus	4.64	0.69	14.30
MI	Flint Police Department	Securus	4.64	0.69	14.30
MI	Kent County Correctional Facility	Securus	4.64	0.69	14.30
MI	Kent County Courthouse Holding	Securus	4.64	0.69	14.30
MT	Fallon County Sheriff	Securus	4.64	0.69	14.30
NE	Phelps County Correctional	Securus	4.64	0.69	14.30
WI	Buffalo County Sheriff	Securus	4.64	0.69	14.30
WI	Monroe County Sheriff	Securus	4.64	0.69	14.30
MT	Flathead County Jail	Securus	4.62	0.67	14.00
TX	Bastrop County Jail	Securus	4.62	0.12	6.30
KS	Labette County Jail	Securus	4.61	1.01	18.75
MT	Anaconda Police Department	Securus	4.59	0.50	11.59
MT	Beaverhead County Jail	Securus	4.59	0.50	11.59
MT	Lake County Detention Facility	Securus	4.59	0.50	11.59
MT	Ravalli County Sheriff	Securus	4.59	0.50	11.59
MT	Cascade County	Securus	4.59	0.64	13.55
MT	Cascade County Adult Detention Center	Securus	4.59	0.64	13.55
MT	Chouteau County Detention Center	Securus	4.55	0.50	11.55
MT	Toole County Jail	Securus	4.55	0.50	11.55
WA	Benton Franklin Juvenile Facility	Securus	4.54	0.59	12.80
MI	Iosco County Sheriff	Securus	4.45	0.45	10.75
MT	Fergus County Sheriff	Securus	4.45	0.50	11.45
TX	Ray D Anderson Community Corrections	Securus	4.42	0.91	17.16
TX	Uvalde County	Securus	4.41	0.31	8.75
TX	Madison County Sheriff	Securus	4.37	0.85	16.27
NY	Niagara County Correctional Facility	Securus	4.35	0.40	9.95

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
TX	Grayson County	Securus	4.35	0.58	12.47
TN	Johnson City Jail	Securus	4.34	0.66	13.58
TX	Wood County Sheriff Department	Securus	4.33	0.56	12.17
MI	Ingham County Correctional Facility	Securus	4.32	0.53	11.74
TX	Coryell County Sheriff	Securus	4.32	0.70	14.12
CO	Chief Ignacio Justice Center	Securus	4.31	0.56	12.15
IL	Pike County Jail	Securus	4.31	0.81	15.65
TX	Hudspeth County Sheriff - JSI	Securus	4.31	0.70	14.11
TN	Hamblen County Jail	Securus	4.28	0.60	12.68
IA	Allamakee County Jail	Securus	4.25	0.50	11.25
TN	Chester County Jail	Securus	4.25	0.57	12.23
TX	Wilson County Jail	Securus	4.25	0.73	14.47
TX	Lasalle Regional Detention Center	Securus	4.24	0.72	14.32
IL	St Clair County Jail	Securus	4.23	0.68	13.75
TN	Sullivan County Sheriff	Securus	4.22	0.58	12.34
TX	San Jacinto County Sheriff	Securus	4.20	0.68	13.72
WY	Goshen County Detention Center	Securus	4.20	0.50	11.20
TX	Atascosa County Jail	Securus	4.19	0.57	12.17
MN	Goodhue Sheriff	Securus	4.17	0.57	12.15
TN	Sullivan Correctional Facility Building 2	Securus	4.17	0.58	12.29
TX	Titus County Jail	Securus	4.17	0.65	13.27
KS	Stevens County Jail	Securus	4.16	0.66	13.40
MI	Dickinson County Jail	Securus	4.16	0.37	9.34
NE	Kimball County Sheriff	Securus	4.16	0.66	13.40
NE	Richardson County Jail	Securus	4.16	0.66	13.40
TX	Wise County Sheriff	Securus	4.16	0.64	13.12
TX	Brazoria County Sheriff Jail	Securus	4.16	0.65	13.26
IL	Randolph County Jail	Securus	4.15	0.80	15.35
TX	Starr County Jail	Securus	4.15	0.63	12.97
TX	Upshur County Jail	Securus	4.12	0.60	12.52
KS	Meade County Jail	Securus	4.11	0.51	11.25
TX	Zavala County Jail	Securus	4.11	0.49	10.97
MN	McLeod County Jail	Securus	4.10	0.50	11.10
TX	Comal County Jail	Securus	4.09	0.49	10.95
CA	Lassen County Jail – All Locations	Securus	4.08	0.98	17.80
TX	Willacy County Jail	Securus	4.08	0.56	11.92
TX	Harris County – All Locations	Securus	4.03	0.45	10.33
TX	San Patricio County Jail	Securus	4.03	0.51	11.17
TX	Hopkins County Jail	Securus	4.03	0.53	11.45
IL	White County Jail	Securus	4.02	0.52	11.30
TX	Taylor County Substance Abuse Treatment Center	Securus	4.02	0.50	11.02
IL	Marshall County Sheriff	Securus	4.01	0.51	11.15

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
IL	Stark County Jail	Securus	4.01	0.51	11.15
KS	Butler County Corrections	Securus	4.01	0.51	11.15
KS	Elk County Jail	Securus	4.01	0.51	11.15
KS	Graham County Jail	Securus	4.01	0.51	11.15
KS	Edwards County Jail	Securus	4.01	0.95	17.31
MO	Jennings Adult Correctional Facility	Securus	4.01	1.16	20.25
TX	Midlothian City Jail	Securus	4.01	0.39	9.47
TX	Kaufman County Law Enforcement Center	Securus	4.01	0.49	10.87
IA	Appanoose County Jail	Securus	4.00	0.25	7.50
IA	Audubon County Jail	Securus	4.00	0.50	11.00
IA	Crawford County Jail	Securus	4.00	0.50	11.00
IA	Monona County Sheriff	Securus	4.00	0.50	11.00
IA	Pocahontas County Jail	Securus	4.00	0.50	11.00
IL	Tazewell County Justice Center	Securus	4.00	0.38	9.32
KS	Shawnee County Adult Detention Center	Securus	4.00	0.01	4.14
KS	Shawnee County Juvenile Detention Center	Securus	4.00	0.01	4.14
UT	Millard County Jail	Securus	4.00	0.79	15.06
AR	Saline County Detention Center	Securus	3.99	0.34	8.75
TX	Burleson County Jail	Securus	3.99	0.47	10.57
IL	Vermilion County Jail	Securus	3.96	0.61	12.50
IA	Woodbury County Jail	Securus	3.95	0.01	4.09
IA	Woodbury County Work Release	Securus	3.95	0.01	4.09
IL	Mclean County Jail	Securus	3.95	0.60	12.35
PA	Union County Prison	Securus	3.95	0.45	10.25
IL	Adams County Jail	Securus	3.93	0.38	9.25
KS	Saline County Jail	Securus	3.93	0.43	9.95
TX	Jasper County Law Enforcement Center	Securus	3.93	0.66	13.17
IA	Mahaska County Jail	Securus	3.92	0.32	8.40
IA	Webster County Jail	Securus	3.92	0.32	8.40
TX	Brownsville Police Department	Securus	3.92	0.41	9.66
TX	Collingsworth County Jail	Securus	3.92	0.41	9.66
IL	Bond County Sheriff	Securus	3.91	0.29	7.97
MO	Crawford County Jail	Securus	3.91	0.66	13.15
TX	Desoto City Jail	Securus	3.91	0.39	9.37
TX	Duval County Jail	Securus	3.91	0.39	9.37
TX	Kaufman Co. Jail	Securus	3.91	0.39	9.37
TX	Menard County Sheriff	Securus	3.91	0.39	9.37
TX	Trinity County Sheriff	Securus	3.91	0.39	9.37
TX	Liberty County Jail	Securus	3.91	0.64	12.87
UT	Davis County Jail	Securus	3.91	0.01	4.05
AR	Lake Village City Jail	Securus	3.90	0.40	9.50
IL	Macoupin County Jail	Securus	3.90	0.30	8.10

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
IL	Ogle County Jail	Securus	3.90	0.40	9.50
CA	Napa County DOC	Securus	3.88	0.78	14.80
CA	Napa County Juvenile Probation	Securus	3.88	0.78	14.80
IA	Wapello County Jail	Securus	3.88	0.28	7.80
WI	Eau Claire County Jail	Securus	3.88	0.71	13.82
WI	Eau Claire County Jail - Main	Securus	3.88	0.71	13.82
TX	Wichita County Jail Annex	Securus	3.87	0.39	9.33
IL	Woodford County Jail	Securus	3.86	0.36	8.90
IL	Ford County Jail	Securus	3.86	0.49	10.72
IL	Rock Island Sheriff	Securus	3.86	0.51	11.00
TX	Irving Police Department	Securus	3.86	0.36	8.90
TX	Mesquite Police Department	Securus	3.86	0.36	8.90
IL	Madison County Jail	Securus	3.85	0.35	8.75
KS	Dickinson County Jail	Securus	3.85	0.85	15.75
OK	Del City Police Department	Securus	3.85	0.01	3.99
CA	San Mateo County - Maguire Correctional	Securus	3.84	0.69	13.50
IL	Piatt County Sheriff	Securus	3.84	0.49	10.70
IL	Alton City Police Department	Securus	3.82	0.27	7.60
IL	Stephenson County Jail	Securus	3.82	0.32	8.30
IL	Grundy County Sheriff	Securus	3.82	0.47	10.40
KS	Ellsworth County Jail	Securus	3.82	0.36	8.86
MO	Mississippi County Detention Center	Securus	3.82	0.57	11.80
IL	Clay County Jail	Securus	3.81	0.31	8.15
IL	Monroe County Jail	Securus	3.81	0.31	8.15
IN	Lagrange County Sheriff	Securus	3.81	0.81	15.15
IN	Morgan County Jail	Securus	3.81	0.81	15.15
WY	Big Horn County Detention Center	Securus	3.81	0.61	12.35
IL	Mason County Sheriff	Securus	3.80	0.30	8.00
IL	Menard County Jail	Securus	3.80	0.30	8.00
IL	Saline County Jail	Securus	3.80	0.30	8.00
CA	Mariposa County Sheriff	Securus	3.79	0.69	13.45
CA	Mono County Mammoth Lakes Courthouse	Securus	3.79	0.69	13.45
CA	Mono County Sheriff	Securus	3.79	0.69	13.45
CA	Monterey County Probation Office	Securus	3.79	0.69	13.45
CA	Monterey County Youth Center	Securus	3.79	0.69	13.45
CA	Trinity County Probation	Securus	3.79	0.69	13.45
CA	Volunteers Of America - Los Angeles	Securus	3.79	0.69	13.45
PA	Potter County Jail	Securus	3.78	0.35	8.68
IL	Granite City Jail	Securus	3.77	0.27	7.55
KS	Ottawa County Jail	Securus	3.77	0.77	14.55
MO	Cape Girardeau Police Department	Securus	3.76	0.66	13.00
MO	Grundy County Detention Center	Securus	3.76	1.16	20.00

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
IA	Clarke County Jail	Securus	3.75	0.25	7.25
IA	Marion County Jail	Securus	3.75	0.25	7.25
IA	Mitchell County Jail	Securus	3.75	0.25	7.25
IN	Shelby County Sheriff	Securus	3.75	0.75	14.25
IA	Bremer County Sheriff	Securus	3.74	0.74	14.10
IL	Kendall County Jail	Securus	3.74	0.39	9.20
IN	Franklin County Jail	Securus	3.74	0.74	14.10
IN	Hammond City Jail	Securus	3.74	0.74	14.10
WY	Hot Springs County Detention Center	Securus	3.71	0.76	14.35
WY	Weston County Detention Center	Securus	3.71	0.76	14.35
IL	Lawrence County Jail	Securus	3.69	0.32	8.17
IL	Whiteside County Jail	Securus	3.69	0.32	8.17
TX	La Salle County Jail	Securus	3.68	0.18	6.20
UT	Garfield County Jail	Securus	3.68	0.47	10.26
IL	McDonough County Jail	Securus	3.67	0.32	8.15
IL	Clark County Jail	Securus	3.66	0.29	7.72
IL	Iroquois County Jail	Securus	3.66	0.29	7.72
IL	Jersey County Jail	Securus	3.66	0.29	7.72
IL	Mercer County Sheriff	Securus	3.66	0.29	7.72
IL	Richland County Jail	Securus	3.66	0.29	7.72
TX	Jim Hogg County	Securus	3.66	0.39	9.12
TX	Cooke County Jail	Securus	3.66	0.64	12.62
AR	Greene County Detention Facility	Securus	3.65	0.65	12.75
IL	Boone County Jail	Securus	3.65	0.30	7.85
IL	Crawford County Jail	Securus	3.65	0.30	7.85
IL	Dewitt County Sheriff	Securus	3.65	0.30	7.85
IL	Morgan County Jail	Securus	3.65	0.30	7.85
IL	Warren County Jail	Securus	3.65	0.30	7.85
IN	Lawrence County Sheriff	Securus	3.65	0.65	12.75
MI	Midland County Jail	Securus	3.64	0.64	12.60
TX	Lamar County Jail	Securus	3.64	0.62	12.32
IL	Henry County Jail	Securus	3.62	0.27	7.40
MI	Grand Traverse County	Securus	3.62	0.62	12.30
TN	Carter County Jail	Securus	3.62	0.58	11.74
CA	Lompoc City Jail	Securus	3.61	0.51	10.75
IN	Jefferson County Jail	Securus	3.61	0.61	12.15
SD	Codington County Jail	Securus	3.61	0.47	10.19
ND	Cass County Sheriff	Securus	3.60	0.60	12.00
OK	Davis CCA	Securus	3.60	0.11	5.14
OK	Ottawa County Jail	Securus	3.60	0.33	8.22
OK	Washington County Jail	Securus	3.60	0.80	14.80
OK	Cherokee County Jail	Securus	3.60	1.10	19.00

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
OK	Texas County Jail	Securus	3.60	1.10	19.00
WI	Racine County Jail	Securus	3.60	0.10	5.00
WI	Racine County Juvenile Detention Center	Securus	3.60	0.10	5.00
IN	Greene County Sheriff	Securus	3.59	0.59	11.85
IN	Rush County Jail	Securus	3.58	0.58	11.70
IN	Steuben County Jail	Securus	3.57	0.57	11.55
IN	Sullivan County Jail	Securus	3.57	0.57	11.55
WY	Park County Detention Center	Securus	3.57	0.37	8.75
VA	Hampton City Jail	Securus	3.55	0.55	11.25
WY	Converse County Detention Center	Securus	3.55	0.35	8.45
VA	Central Virginia Regional Jail	Securus	3.54	0.54	11.10
CO	Moffat County Jail	Securus	3.53	0.39	8.99
IN	Montgomery County Sheriff	Securus	3.53	0.53	10.95
VA	Roanoke City Jail	Securus	3.52	0.52	10.80
IN	Gibson County Jail	Securus	3.51	0.51	10.65
MO	Arnold City Jail	Securus	3.51	0.66	12.75
MO	Aurora City Police Department	Securus	3.51	0.66	12.75
MO	Doniphan City Jail	Securus	3.51	0.66	12.75
MO	Moline Acres City Police Department	Securus	3.51	0.66	12.75
MO	Monett City Police Department	Securus	3.51	0.66	12.75
MO	Northwoods City Police Department	Securus	3.51	0.66	12.75
MO	Overland City Police Department	Securus	3.51	0.66	12.75
MO	Sikeston Department Of Public Safety	Securus	3.51	0.66	12.75
UT	Grand County Jail	Securus	3.51	0.30	7.71
AR	Conway County Detention Center	Securus	3.50	0.50	10.50
AR	Johnson County Detention Center	Securus	3.50	0.50	10.50
CA	Seal Beach Police Department	Securus	3.50	0.50	10.50
CA	Yuba Sutter Juvenile Hall	Securus	3.50	0.50	10.50
VA	Alexandria Detention Center	Securus	3.50	0.50	10.50
WY	Platte County Detention Center	Securus	3.49	0.49	10.35
IN	Wabash County Jail	Securus	3.48	0.48	10.20
WA	Island County Jail	Securus	3.47	0.67	12.85
ID	Valley County Jail	Securus	3.46	0.41	9.20
UT	Beaver County Jail	Securus	3.46	0.20	6.26
UT	San Juan County Jail	Securus	3.46	0.51	10.60
IA	Cedar County Sheriff	Securus	3.45	0.45	9.75
IN	Daviess County Jail	Securus	3.45	0.45	9.75
KS	Lincoln County Jail	Securus	3.45	0.35	8.35
TX	Collin County – All Locations	Securus	3.45	0.01	3.59
CO	Saguache County Jail	Securus	3.40	0.51	10.54
IN	Benton County Jail	Securus	3.40	0.40	9.00
IN	Cass-Pulaski Community Corrections	Securus	3.40	0.40	9.00

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
IN	Jackson County Sheriff	Securus	3.40	0.40	9.00
IN	Putnam County Jail	Securus	3.40	0.40	9.00
IN	Switzerland County Jail	Securus	3.40	0.40	9.00
IN	Tipton County Jail	Securus	3.40	0.40	9.00
IN	Warren County Jail	Securus	3.40	0.40	9.00
IN	Warrick County Sheriff	Securus	3.40	0.40	9.00
UT	Iron County Jail	Securus	3.40	0.18	5.92
UT	Wasatch County Jail	Securus	3.40	0.40	9.00
VA	Bristol Virginia City Jail	Securus	3.40	0.40	9.00
CO	Weld County – All Locations	Securus	3.38	0.13	5.20
TN	Carroll County Jail	Securus	3.37	0.78	14.29
KS	Phillips County Jail	Securus	3.36	0.36	8.40
IL	Department of Corrections – All Locations	Securus	3.35	0.02	3.63
KS	Smith County Jail	Securus	3.35	0.35	8.25
WA	Wapato City Jail	Securus	3.35	0.35	8.25
WY	Sublette County Detention Facility	Securus	3.35	0.35	8.25
CA	Madera County Doc	Securus	3.32	0.57	11.30
CO	Chaffee County Jail	Securus	3.32	0.43	9.34
KY	Henderson County Community Services	Securus	3.32	0.57	11.30
KY	Henderson County Detention Center	Securus	3.32	0.57	11.30
CA	Sutter County Sheriff	Securus	3.31	0.30	7.51
UT	Tooele County Jail	Securus	3.31	0.31	7.65
CA	Amador County Jail	Securus	3.30	0.80	14.50
IN	Dubois County Security Center	Securus	3.30	0.80	14.50
UT	Carbon County Jail	Securus	3.30	0.30	7.50
UT	Emery County Jail	Securus	3.30	0.30	7.50
UT	Juab County Jail	Securus	3.30	0.30	7.50
WA	Forks City Police Department	Securus	3.30	0.50	10.30
MN	Many Rivers Juvenile Detention Center	Securus	3.29	0.39	8.75
MN	Olmsted County Adult Detention Center	Securus	3.29	0.39	8.75
CO	Washington County Jail	Securus	3.28	0.39	8.74
SD	Brown County Jail	Securus	3.28	0.64	12.24
IL	Will County – All Locations	Securus	3.26	0.29	7.32
IL	Lee County Sheriff Department	Securus	3.26	0.36	8.30
MO	Berkeley City Police Department	Securus	3.26	0.66	12.50
MO	Festus City Police Department	Securus	3.26	0.66	12.50
MO	Lee's Summit City Police Department	Securus	3.26	0.66	12.50
ID	Custer County Jail	Securus	3.25	0.50	10.25
ID	Idaho County Jail	Securus	3.25	0.50	10.25
IL	Logan County Jail	Securus	3.25	0.35	8.15
MN	Waseca County Jail	Securus	3.25	0.50	10.25
IL	Massac County Sheriff	Securus	3.24	0.32	7.72

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
MO	Wright County Jail	Securus	3.24	0.74	13.60
OK	Sand Springs City Police Department	Securus	3.23	0.22	6.31
CA	Inyo County Jail	Securus	3.22	0.72	13.30
IL	Jackson County Jail	Securus	3.22	0.32	7.70
IL	Union County Jail	Securus	3.22	0.32	7.70
IL	Williamson County Jail	Securus	3.22	0.32	7.70
IL	Collinsville City Police Department	Securus	3.21	0.29	7.27
IL	Henderson County Sheriff	Securus	3.21	0.29	7.27
IL	Washington County Jail	Securus	3.21	0.29	7.27
KY	Clinton County Jail	Securus	3.21	0.21	6.15
MA	Franklin County Jail	Securus	3.21	0.21	6.15
MO	St Peters Police Department	Securus	3.21	0.45	9.51
IA	Pottawattamie County Jail	Securus	3.20	0.40	8.80
IL	Douglas County Jail	Securus	3.20	0.30	7.40
WY	Teton County Detention Center	Securus	3.20	0.50	10.20
CO	Summit County Jail	Securus	3.19	0.44	9.35
IL	Clinton County Jail	Securus	3.19	0.29	7.25
IL	Perry County Jail	Securus	3.19	0.29	7.25
IL	Greene County Sheriff	Securus	3.18	0.26	6.82
KY	Carroll County Detention Center	Securus	3.18	0.43	9.20
MA	Berkshire County House Of Corrections	Securus	3.17	0.17	5.55
MA	Berkshire County Jail	Securus	3.17	0.17	5.55
IL	Fulton County Jail	Securus	3.16	0.26	6.80
IL	Macon County Jail	Securus	3.16	0.26	6.80
IL	Shelby County Jail	Securus	3.16	0.26	6.80
KY	Big Sandy Regional Detention Center	Securus	3.16	0.41	8.90
MA	Ash Street Jail & Regional Lock Up	Securus	3.16	0.16	5.40
MA	Bristol County Faunce Corner	Securus	3.16	0.16	5.40
MO	St Genevieve County Jail	Securus	3.15	0.90	15.75
WI	Sheboygan County Detention Center	Securus	3.15	0.48	9.87
WI	Sheboygan County Jail	Securus	3.15	0.48	9.87
AR	Department of Corrections – All Locations	Securus	3.12	0.12	4.80
OH	Allen County Sheriff	Securus	3.11	0.36	8.15
OH	Ashtabula City Police Department	Securus	3.11	0.36	8.15
OH	Auglaize County Jail	Securus	3.11	0.36	8.15
OH	Bedford Police Department	Securus	3.11	0.36	8.15
OH	Belmont County Jail	Securus	3.11	0.36	8.15
OH	Broadview Heights Police Department	Securus	3.11	0.36	8.15
OH	Brown County Adult Detention Center	Securus	3.11	0.36	8.15
OH	Central Ohio Youth Center	Securus	3.11	0.36	8.15
OH	Clark County Jail	Securus	3.11	0.36	8.15
OH	Clark County Juvenile Detention Center	Securus	3.11	0.36	8.15

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
OH	Clinton County Adult Detention	Securus	3.11	0.36	8.15
OH	Columbiana County Jail	Securus	3.11	0.36	8.15
OH	Columbiana Minimum Security NAC	Securus	3.11	0.36	8.15
OH	Corrections Commission Of NW Ohio	Securus	3.11	0.36	8.15
OH	Crawford County Jail	Securus	3.11	0.36	8.15
OH	Cuyahoga County Juvenile Detention Center	Securus	3.11	0.36	8.15
OH	Darke County Jail	Securus	3.11	0.36	8.15
OH	East Ohio Correctional Center	Securus	3.11	0.36	8.15
OH	Erie County Jail	Securus	3.11	0.36	8.15
OH	Fairborn City Police Department	Securus	3.11	0.36	8.15
OH	Fairfield County – All Locations	Securus	3.11	0.36	8.15
OH	Fayette County Sheriff	Securus	3.11	0.36	8.15
OH	Findlay	Securus	3.11	0.36	8.15
OH	Guernsey County Jail	Securus	3.11	0.36	8.15
OH	Hancock County Sheriff	Securus	3.11	0.36	8.15
OH	Harrison County Jail	Securus	3.11	0.36	8.15
OH	Holmes County Jail	Securus	3.11	0.36	8.15
OH	Jackson County Correctional	Securus	3.11	0.36	8.15
OH	Knox County Jail	Securus	3.11	0.36	8.15
OH	Lawrence County Jail	Securus	3.11	0.36	8.15
OH	Licking County Justice Center	Securus	3.11	0.36	8.15
OH	Logan County Juvenile Detention Center	Securus	3.11	0.36	8.15
OH	Logan County Sheriff	Securus	3.11	0.36	8.15
OH	Lorain County Correctional Facility	Securus	3.11	0.36	8.15
OH	Lorain Police Department	Securus	3.11	0.36	8.15
OH	Maple Heights Police Department	Securus	3.11	0.36	8.15
OH	Medina County Jail	Securus	3.11	0.36	8.15
OH	Medina County Juvenile Detention Center	Securus	3.11	0.36	8.15
OH	Meigs County Jail	Securus	3.11	0.36	8.15
OH	Miami County Incarceration Facility	Securus	3.11	0.36	8.15
OH	Miami County Jail	Securus	3.11	0.36	8.15
OH	Middleport City Jail	Securus	3.11	0.36	8.15
OH	Morrow County Sheriff	Securus	3.11	0.36	8.15
OH	Multi-County Correctional Center	Securus	3.11	0.36	8.15
OH	Multi-County Juvenile Detention Center	Securus	3.11	0.36	8.15
OH	Noble County Sheriff	Securus	3.11	0.36	8.15
OH	North Central Ohio Rehabilitation	Securus	3.11	0.36	8.15
OH	North Royalton City Police Department	Securus	3.11	0.36	8.15
OH	Northwest Community Correctional Center	Securus	3.11	0.36	8.15
OH	Northwest Ohio Juvenile Detention Center	Securus	3.11	0.36	8.15
OH	Parma Police Department	Securus	3.11	0.36	8.15
OH	Pickaway County Jail	Securus	3.11	0.36	8.15

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
OH	Portage County Jail	Securus	3.11	0.36	8.15
OH	Portage/Geauga Juvenile Detention Center	Securus	3.11	0.36	8.15
OH	Preble County Jail	Securus	3.11	0.36	8.15
OH	Putnam County Sheriff	Securus	3.11	0.36	8.15
OH	Richland County Jail	Securus	3.11	0.36	8.15
OH	Ross County Jail	Securus	3.11	0.36	8.15
OH	Scioto County	Securus	3.11	0.36	8.15
OH	Scioto County Correctional Center	Securus	3.11	0.36	8.15
OH	Southeast Ohio Regional Jail	Securus	3.11	0.36	8.15
OH	Tri County Regional Jail	Securus	3.11	0.36	8.15
OH	Van Wert County Correctional Facility	Securus	3.11	0.36	8.15
OH	Wayne County Discipline & Rehabilitation Center	Securus	3.11	0.36	8.15
OH	Wayne County Jail	Securus	3.11	0.36	8.15
OH	Western Ohio Regional Treatment	Securus	3.11	0.36	8.15
OH	Wood County Jail	Securus	3.11	0.36	8.15
OH	Wyandot County Sheriff	Securus	3.11	0.36	8.15
WA	Island County Juvenile Detention Facility	Securus	3.11	0.50	10.11
KY	Leslie County Detention Center	Securus	3.10	0.35	8.00
KY	Three Forks Regional Jail	Securus	3.10	0.35	8.00
MA	Barnstable County Corrections Facility	Securus	3.10	0.10	4.50
MA	Dukes County Jail	Securus	3.10	0.10	4.50
MA	Worcester County Jail	Securus	3.10	0.10	4.50
MT	Sanders County Jail	Securus	3.10	0.50	10.10
NC	Alamance County Detention Center	Securus	3.09	0.26	6.73
NC	Alamance County Detention Center Annex	Securus	3.09	0.26	6.73
CO	Fremont County Detention Center	Securus	3.08	0.29	7.14
KY	Lewis County Detention Center	Securus	3.08	0.33	7.70
WY	Uinta County Detention Center	Securus	3.08	0.53	10.50
CO	Huerfano County Jail	Securus	3.07	0.43	9.09
KY	Rowan County Detention Center	Securus	3.06	0.31	7.40
TX	Tarrant County – All Locations	Securus	3.06	0.01	3.20
CA	Trinity County Sheriff	Securus	3.05	0.30	7.25
CO	Lincoln County Sheriff	Securus	3.04	0.25	6.54
TN	Fentress County Justice Center	Securus	3.03	0.43	9.05
TN	Fentress County Sheriff	Securus	3.03	0.43	9.05
WY	Natrona County Detention Center	Securus	3.03	0.46	9.47
CO	Logan County Jail	Securus	3.02	0.23	6.24
CO	Broomfield City Jail	Securus	3.02	0.52	10.30
MT	Broadwater County	Securus	3.02	0.12	4.70
OH	Ashland County Jail	Securus	3.02	0.27	6.80
CO	Lake County Sheriff	Securus	3.01	0.26	6.65
KY	Kentucky River Regional Jail	Securus	3.01	0.41	8.75

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
CO	Laplata County Jail	Securus	3.00	0.50	10.00
KS	Rice County Law Enforcement Center	Securus	3.00	0.50	10.00
MN	Brooklyn Park Police Department	Securus	3.00	0.25	6.50
MN	Sibley County Jail	Securus	3.00	0.50	10.00
MO	Scott County Jail	Securus	3.00	1.00	17.00
OH	Carroll County Sheriff	Securus	3.00	0.25	6.50
SD	Fall River County Jail	Securus	3.00	0.36	8.04
CO	Prowers County Jail	Securus	2.99	0.20	5.79
FL	Seminole County Jail	Securus	2.99	0.24	6.35
MT	Jefferson County Detention Facility	Securus	2.99	0.01	3.13
NC	Chowan County Detention Facility	Securus	2.99	0.31	7.33
NC	Jackson County Jail	Securus	2.98	0.40	8.58
CO	Montezuma County Jail	Securus	2.97	0.43	8.99
CO	Park County Detention Center	Securus	2.96	0.32	7.44
KY	Meade County Jail	Securus	2.95	0.45	9.25
MA	Suffolk County House Of Corrections	Securus	2.95	0.10	4.35
MA	Suffolk County Jail	Securus	2.95	0.10	4.35
MT	Lewis & Clark County Detention Center	Securus	2.95	0.05	3.65
OH	Richland County Community Alternative Center	Securus	2.95	0.20	5.75
NC	Henderson County Detention Center	Securus	2.94	0.36	7.98
NC	Rockingham County Jail	Securus	2.94	0.36	7.98
NC	Rowan County Detention Center	Securus	2.94	0.36	7.98
NC	Rowan County Detention Center Annex	Securus	2.94	0.36	7.98
CO	Aurora Municipal Court Administration	Securus	2.92	0.62	11.60
CA	Calaveras County Sheriff	Securus	2.91	0.41	8.65
NC	Columbus County Detention Center	Securus	2.91	0.33	7.53
NC	Hoke County Detention Center	Securus	2.91	0.33	7.53
CO	Elbert County Jail	Securus	2.90	0.26	6.54
MO	Ferguson City Police Department	Securus	2.90	0.40	8.50
MO	St Francois County Jail	Securus	2.90	0.65	12.00
NC	Iredell County Annex	Securus	2.90	0.32	7.38
NC	Iredell County Detention Center	Securus	2.90	0.32	7.38
OH	Ottawa County Detention Facility	Securus	2.90	0.36	7.94
OH	Ottawa County Minimum Security	Securus	2.90	0.36	7.94
WY	Washakie County Jail	Securus	2.90	0.35	7.80
MO	Phelps County Sheriff	Securus	2.89	0.64	11.85
WA	Walla Walla County Jail	Securus	2.89	0.25	6.39
CA	Del Norte County Sheriff	Securus	2.88	0.38	8.20
NE	Dakota County Jail	Securus	2.88	0.63	11.70
NE	Dakota County Jail	Securus	2.88	0.63	11.70
OH	Shelby County Sheriff	Securus	2.88	0.36	7.92
CO	Morgan County Jail	Securus	2.87	0.23	6.09

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
NC	Macon County Detention Center	Securus	2.87	0.29	6.93
NC	Scotland County Sheriff	Securus	2.87	0.29	6.93
OR	Polk County Sheriff	Securus	2.87	0.09	4.13
NC	Cherokee County Detention Facility	Securus	2.86	0.28	6.78
NC	Cabarrus County Sheriff	Securus	2.86	0.36	7.90
CO	Teller County Jail	Securus	2.85	0.31	7.19
NC	Rutherford County Detention Center	Securus	2.85	0.27	6.63
NC	Cleveland County Detention Facility	Securus	2.84	0.26	6.48
NC	Cleveland County Jail Annex	Securus	2.84	0.26	6.48
CO	Montrose County Jail	Securus	2.83	0.44	8.99
NC	Caldwell County Detention Center	Securus	2.83	0.33	7.45
NC	Albemarle District Jail	Securus	2.82	0.24	6.18
NC	Anson County Sheriff	Securus	2.82	0.24	6.18
NC	Brunswick County Jail	Securus	2.82	0.24	6.18
NC	Montgomery County Sheriff	Securus	2.82	0.24	6.18
CA	Modoc County Jail	Securus	2.80	0.30	7.00
CO	Gunnison County Jail	Securus	2.80	0.15	4.90
CO	Otero County Jail	Securus	2.80	0.40	8.40
NC	New Hanover County Detention Center	Securus	2.80	0.30	7.00
TN	Knox County Detention Facility	Securus	2.80	0.01	2.94
TN	Knox County Jail	Securus	2.80	0.01	2.94
TN	Knox County Work Release Center	Securus	2.80	0.01	2.94
CO	Routt County Jail	Securus	2.79	0.25	6.29
CO	Delta County Jail	Securus	2.79	0.30	6.99
CO	Delta County Work Release	Securus	2.79	0.30	6.99
ND	Heart Of America Correctional & Treatment Center	Securus	2.76	0.40	8.36
CA	Santa Cruz County Juvenile Hall	Securus	2.75	0.25	6.25
CO	Boulder County Jail	Securus	2.75	0.00	2.75
NE	Washington County Jail	Securus	2.75	0.50	9.75
VA	Lancaster County Jail	Securus	2.75	0.50	9.75
CO	Southern Ute Indian Tribe	Securus	2.74	0.20	5.54
CO	Pueblo County Detention Center	Securus	2.74	0.24	6.10
CO	Pueblo County Judicial Building	Securus	2.74	0.24	6.10
WA	Aberdeen Police Department	Securus	2.74	0.35	7.64
WA	Toppenish City Jail	Securus	2.74	0.35	7.64
CO	Clear Creek County Jail	Securus	2.71	0.17	5.09
VA	Northern Neck Regional Jail	Securus	2.70	0.20	5.50
KS	Barton County Jail	Securus	2.69	0.69	12.35
WA	Asotin County	Securus	2.69	0.30	6.89
OR	Union County Sheriff	Securus	2.68	0.25	6.18
PA	Wyoming County Correctional Facility	Securus	2.68	0.68	12.20
WA	Sunnyside City Police Department	Securus	2.68	0.54	10.24

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
CA	Butte County Jail	Securus	2.67	0.42	8.55
CA	Butte County Juvenile Hall	Securus	2.67	0.42	8.55
MO	Pike County Detention Center	Securus	2.67	0.42	8.55
OR	Klamath County Sheriff	Securus	2.67	0.49	9.53
CO	Alamosa County Detention Center	Securus	2.66	0.27	6.44
NC	Richmond County Jail	Securus	2.66	0.41	8.40
MA	Essex County – All Locations	Securus	2.65	0.15	4.75
MO	Boone County Commission	Securus	2.65	0.40	8.25
MO	Kansas City Police Dept. – All Locations	Securus	2.65	0.40	8.25
NE	Adams County Jail	Securus	2.65	0.40	8.25
OH	Strongsville Police Department	Securus	2.65	0.15	4.75
NC	Bladen County Sheriff	Securus	2.62	0.29	6.68
CO	Arapahoe County Sheriff	Securus	2.60	0.10	4.00
CO	Bent County Jail	Securus	2.60	0.35	7.50
IA	Polk County	Securus	2.60	0.01	2.74
NC	Pender County Jail	Securus	2.60	0.27	6.38
WA	Cowlitz County Juvenile Facility	Securus	2.60	0.35	7.50
WA	Walla Walla County Juvenile	Securus	2.60	0.35	7.50
FL	Madison County Jail	Securus	2.58	0.22	5.66
CA	Fresno County Juvenile Justice Center	Securus	2.55	0.30	6.75
CO	Denver County Jail	Securus	2.55	0.01	2.69
CO	Downtown Detention Center	Securus	2.55	0.01	2.69
CO	Rio Grande County Jail	Securus	2.55	0.15	4.65
NC	Union County Jail	Securus	2.55	0.31	6.89
NJ	Passaic Co Jail - Work Release/Motor Pool	Securus	2.55	0.25	6.05
NJ	Passaic County Jail	Securus	2.55	0.25	6.05
OH	Ashtabula County Jail	Securus	2.55	0.30	6.75
CO	Jefferson County Sheriff's Booking	Securus	2.53	0.33	7.15
CO	Jefferson County Sheriff's Detention Facility	Securus	2.53	0.33	7.15
FL	Escambia County Road Prison	Securus	2.53	0.42	8.41
NE	Saunders County Jail	Securus	2.53	0.38	7.85
CA	Monterey County Jail	Securus	2.50	0.17	4.88
CA	San Mateo County Youth Services Center	Securus	2.50	0.25	6.00
SC	Greenville County Detention Center	Securus	2.50	0.33	7.12
SC	Abbeville County Detention Center	Securus	2.50	0.40	8.10
SC	Aiken County Detention Center	Securus	2.50	0.40	8.10
SC	Cherokee County Jail	Securus	2.50	0.40	8.10
SC	Chesterfield County Detention Center	Securus	2.50	0.40	8.10
SC	Chesterfield County Work Camp	Securus	2.50	0.40	8.10
SC	Darlington County Detention Center	Securus	2.50	0.40	8.10
SC	Dillon County Detention Center	Securus	2.50	0.40	8.10
SC	Edgefield County Jail	Securus	2.50	0.40	8.10

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
SC	Greenwood County Jail	Securus	2.50	0.40	8.10
SC	Horry County Detention Center	Securus	2.50	0.40	8.10
SC	Jasper County Detention Center	Securus	2.50	0.40	8.10
SC	Lancaster County Jail	Securus	2.50	0.40	8.10
SC	Laurens County Jail	Securus	2.50	0.40	8.10
SC	Oconee County Law Enforcement	Securus	2.50	0.40	8.10
SC	Pickens County Detention Facility	Securus	2.50	0.40	8.10
SC	Rock Hill City Jail	Securus	2.50	0.40	8.10
SC	Union County Jail	Securus	2.50	0.40	8.10
SC	Union County Prison Camp	Securus	2.50	0.40	8.10
SC	York County Jail	Securus	2.50	0.40	8.10
CO	Las Animas County Jail	Securus	2.49	0.10	3.89
NC	Dare County Detention Center	Securus	2.49	0.24	5.85
PA	Tioga County Prison	Securus	2.49	0.49	9.35
CO	Mesa County Jail	Securus	2.48	0.23	5.70
CO	Mesa County Jail Work Release	Securus	2.48	0.23	5.70
TX	Andrews County Jail	Securus	2.45	0.01	2.59
WA	Clallam County Correctional Facility	Securus	2.44	0.55	10.14
FL	Jackson County Jail	Securus	2.43	0.43	8.45
OR	Clatsop County Sheriff	Securus	2.43	0.25	5.93
VA	Patrick County Jail	Securus	2.42	0.35	7.32
IN	Decatur County Jail	Securus	2.41	0.24	5.77
KS	Sumner County Jail	Securus	2.41	0.41	8.15
NH	Rockingham County Department of Corrections	Securus	2.39	0.42	8.27
TN	Dekalb County Jail	Securus	2.37	0.27	6.15
WA	Marysville City Jail	Securus	2.37	0.48	9.09
WA	Mason County Jail	Securus	2.37	0.48	9.09
FL	Alachua County Jail	Securus	2.36	0.40	7.96
FL	Okaloosa County Department Of Correctional Services	Securus	2.30	0.41	8.04
TN	Morgan County Jail	Securus	2.29	0.10	3.69
FL	Taylor County Jail	Securus	2.27	0.41	8.01
NH	Belknap County House of Corrections	Securus	2.27	0.30	6.47
NH	Coos County House Of Corrections	Securus	2.27	0.30	6.47
PA	Butler County Prison	Securus	2.27	0.27	6.05
MN	Scott County Jail	Securus	2.26	0.41	8.00
PA	Warren County Prison	Securus	2.26	0.26	5.90
MN	Sherburne County Jail	Securus	2.24	0.39	7.70
TN	Cheatham County Jail	Securus	2.24	0.05	2.94
ND	Dakota Women's Correctional And Rehabilitation Center	Securus	2.20	0.27	5.98
PA	Elk County Jail	Securus	2.20	0.20	5.00

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
TN	Hardin County Sheriff	Securus	2.20	0.10	3.60
WA	Grandview Police Department	Securus	2.19	0.30	6.39
CA	Hemet City Police Department	Securus	2.18	0.95	15.48
FL	Lake County Detention Center	Securus	2.15	0.40	7.75
FL	Lake County Jail/Sheriff	Securus	2.15	0.40	7.75
MN	Ramsey County Law Enforcement Center	Securus	2.15	0.01	2.29
MN	Wadena County Sheriff	Securus	2.15	0.30	6.35
PA	Greene County Prison	Securus	2.15	0.15	4.25
FL	Marion County Jail	Securus	2.14	0.39	7.60
SD	Davison County Jail	Securus	2.14	0.50	9.14
FL	Baker County Detention Center	Securus	2.13	0.38	7.45
KS	Osborne County Jail	Securus	2.13	0.75	12.63
FL	Suwannee County Jail	Securus	2.11	0.36	7.15
TX	Nueces County Residential Services	Securus	2.11	0.24	5.47
FL	Palm Beach County Main Detention	Securus	2.10	0.35	7.00
MN	Carlton County Jail	Securus	2.10	0.35	7.00
MN	Carver County Jail	Securus	2.10	0.35	7.00
MN	Rice County Jail	Securus	2.10	0.35	7.00
MN	Rice County Jail Annex	Securus	2.10	0.35	7.00
TN	Henderson County Detention Center	Securus	2.09	0.15	4.19
FL	Volusia County Branch Jail	Securus	2.08	0.33	6.70
FL	Volusia County Correctional Facility	Securus	2.08	0.33	6.70
KY	Boyd County Detention Center	Securus	2.07	0.32	6.55
MN	Washington County Jail	Securus	2.07	0.32	6.55
TN	Sumner County Sheriff And Jail	Securus	2.06	0.02	2.34
FL	Bradford County Jail	Securus	2.05	0.30	6.25
FL	Broward County – All Locations	Securus	2.05	0.30	6.25
PA	Crawford County Correctional Facility	Securus	2.05	0.30	6.25
WA	Clallam County Juvenile	Securus	2.05	0.30	6.25
NV	Lincoln County Jail	Securus	2.04	0.54	9.60
SC	Pickens County Prison	Securus	2.00	0.22	5.08
FL	Clay County Jail	Securus	1.98	0.03	2.40
KY	Warren County Regional Jail	Securus	1.97	0.47	8.55
NV	Eureka County Jail	Securus	1.95	0.31	6.29
PA	Clinton County Correctional Facility	Securus	1.95	0.20	4.75
PA	Monroe County Correctional Facility	Securus	1.95	0.20	4.75
NV	Humboldt County Sheriff	Securus	1.94	0.30	6.14
KY	Logan County Detention Center	Securus	1.92	0.42	7.80
NV	Douglas County - Lake Tahoe Jail	Securus	1.91	0.41	7.65
NV	Douglas County - Minden Jail	Securus	1.91	0.41	7.65
TN	Cumberland County Justice Center	Securus	1.91	0.22	4.99
TN	Hancock County Jail	Securus	1.91	0.22	4.99

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
WY	Natrona County Juvenile Detention Center	Securus	1.91	0.41	7.65
KY	Floyd County Detention Center	Securus	1.90	0.40	7.50
TN	Greene County Detention Center	Securus	1.90	0.21	4.84
TN	Greene County Jail Workhouse	Securus	1.90	0.21	4.84
KY	Letcher County Jail	Securus	1.89	0.39	7.35
NV	Mineral County Sheriff	Securus	1.89	0.25	5.39
TN	Campbell County Jail	Securus	1.89	0.20	4.69
TN	Tipton County Jail	Securus	1.89	0.20	4.69
PA	Erie County Community Correctional Facility	Securus	1.88	0.13	3.70
PA	Erie County Prison	Securus	1.88	0.13	3.70
KY	Crittenden County Detention Center	Securus	1.87	0.37	7.05
KY	Scott County Detention Center	Securus	1.87	0.37	7.05
NV	Henderson Detention Center	Securus	1.87	0.37	7.05
TN	Smith County Jail	Securus	1.87	0.18	4.39
KY	Clay County Detention Center	Securus	1.85	0.35	6.75
PA	Columbia County Prison	Securus	1.85	0.20	4.65
TN	Weakley County Jail	Securus	1.84	0.15	3.94
NV	Lyon County Jail	Securus	1.83	0.33	6.45
KY	Nelson County Detention Center	Securus	1.82	0.32	6.30
TN	Scott County Jail Building 2	Securus	1.82	0.13	3.64
NV	Mesquite City Police Department	Securus	1.81	0.31	6.15
NV	Storey County Sheriff	Securus	1.81	0.31	6.15
NV	White Pine County Jail	Securus	1.81	0.31	6.15
TN	Sequatchie County Sheriff	Securus	1.81	0.22	4.89
KY	Barren County Detention Center	Securus	1.80	0.30	6.00
KY	Woodford County Fiscal Ct	Securus	1.80	0.30	6.00
KY	Hardin County Annex	Securus	1.79	0.29	5.85
KY	Hardin County Detention Center	Securus	1.79	0.29	5.85
KY	Hardin County Restricted Custody Building	Securus	1.79	0.29	5.85
KY	Caldwell County Jail	Securus	1.78	0.28	5.70
KY	Estill County Jail	Securus	1.78	0.28	5.70
KY	Pulaski County Detention Center	Securus	1.78	0.28	5.70
TX	Princeton Board Room	Securus	1.78	0.28	5.70
TN	Jefferson County Detention Center	Securus	1.76	0.16	4.00
TN	Jefferson County Workhouse	Securus	1.76	0.16	4.00
TN	McMinn County Justice Center	Securus	1.76	0.16	4.00
WA	Kent Corrections Facility	Securus	1.76	0.26	5.40
ID	Nez Perce County Jail	Securus	1.75	0.25	5.25
ME	Franklin County Jail	Securus	1.75	0.32	6.23
ME	Knox County Jail	Securus	1.75	0.32	6.23
ME	Oxford County Jail	Securus	1.75	0.32	6.23
ME	Penobscot County Jail	Securus	1.75	0.32	6.23

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
ME	Piscataquis County Jail	Securus	1.75	0.32	6.23
ME	Waldo County Jail	Securus	1.75	0.32	6.23
ME	York County Jail	Securus	1.75	0.32	6.23
NV	Lander County Sheriff's	Securus	1.75	0.25	5.25
SC	Lexington County Jail	Securus	1.75	0.10	3.15
KY	Louisville / Jefferson County Metro Govt – All Locations	Securus	1.73	0.23	4.95
NH	Carroll County Department of Corrections	Securus	1.71	0.21	4.65
KY	Otter Creek Correctional Center – CCA	Securus	1.70	0.20	4.50
ME	Androscoggin County Jail	Securus	1.70	0.27	5.48
WV	Division of Juvenile Services – All Locations	Securus	1.70	0.37	6.88
KY	Community Transitional Services	Securus	1.68	0.18	4.20
TX	Cypress Creek	Securus	1.65	0.00	1.65
TX	Sandy Creek	Securus	1.65	0.00	1.65
NH	Merrimack County Department of Corrections	Securus	1.62	0.07	2.60
KS	Sedgwick County – All Locations	Securus	1.60	0.10	3.00
TN	Hamilton County Jail	Securus	1.60	0.10	3.00
SC	Hampton County Jail	Securus	1.58	0.33	6.20
FL	Florida Civil Commitment Center	Securus	1.57	0.22	4.65
TN	Bradley County Jail	Securus	1.53	0.13	3.35
MT	Powell County Sheriff	Securus	1.50	0.67	10.88
NH	Cheshire County Department of Corrections	Securus	1.50	0.19	4.16
SC	Hill Finklea Detention Center	Securus	1.50	0.38	6.82
WA	Yakima County Correctional Center	Securus	1.50	0.12	3.18
WA	Yakima County Jail	Securus	1.50	0.12	3.18
NV	Churchill County Sheriff	Securus	1.49	0.25	4.99
ME	Cumberland County Jail	Securus	1.48	0.14	3.44
ME	Hancock County Jail	Securus	1.48	0.14	3.44
ME	Kennebec County Jail	Securus	1.48	0.14	3.44
ME	Washington County Jail	Securus	1.48	0.14	3.44
NH	Sullivan County Department of Corrections	Securus	1.44	0.19	4.10
NC	Franklin County Detention Center	Securus	1.38	0.01	1.52
MT	CCCS – Watch East Treatment Center	Securus	1.34	0.20	4.14
MT	Chippewa Cree Tribal Justice Center	Securus	1.34	0.20	4.14
MT	CCCS – Nexus	Securus	1.30	0.30	5.50
MT	CCCS – Start	Securus	1.28	0.28	5.20
NV	Pershing County Sheriff	Securus	1.25	0.25	4.75
SC	Clarendon County Jail	Securus	1.25	0.40	6.85
SC	Sumter County Detention Center	Securus	1.25	0.40	6.85
MI	St Joseph County Jail	Securus	1.20	0.70	11.00
ND	Bismarck Transition Center	Securus	1.17	0.17	3.55
SC	Fairfield County Detention Center	Securus	1.15	0.15	3.25
NC	Johnston County Jail	Securus	1.11	0.06	1.95

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
OR	Jefferson County Sheriff	Securus	1.00	0.57	8.98
WI	Bayfield County Sheriff	Securus	1.00	0.50	8.00
WI	Rusk County Jail	Securus	1.00	0.50	8.00
SC	Bamberg County Jail	Securus	0.95	0.28	4.87
TN	White County Jail	Securus	0.90	0.30	5.10
IN	Pulaski County Jail	Securus	0.85	0.35	5.75
IN	White County Jail	Securus	0.79	0.29	4.85
MO	Jefferson County Jail	Securus	0.73	0.73	10.95
IN	Newton County Jail	Securus	0.68	0.68	10.20
MO	Cape Girardeau County Jail	Securus	0.61	0.61	9.15
IN	Dekalb County Jail	Securus	0.60	0.60	9.00
MI	Wayne County - Baird Detention Facility	Securus	0.50	0.50	7.50
MI	Wayne County - Dickerson Detention Facility	Securus	0.50	0.50	7.50
MI	Wayne County - Old Wayne County Jail	Securus	0.50	0.50	7.50
MS	Adams County Jail	Securus	0.50	0.50	7.50
MS	Amite County Jail	Securus	0.50	0.50	7.50
MS	Chickasaw County Jail	Securus	0.50	0.50	7.50
MS	Clarke County Jail	Securus	0.50	0.50	7.50
MS	Copiah County Detention Center	Securus	0.50	0.50	7.50
MS	Desoto County Adult Detention Center	Securus	0.50	0.50	7.50
MS	Desoto County Expansion Facility	Securus	0.50	0.50	7.50
MS	Forrest County Juvenile Detention Center	Securus	0.50	0.50	7.50
MS	Forrest County Regional Jail	Securus	0.50	0.50	7.50
MS	Greene County Jail	Securus	0.50	0.50	7.50
MS	Grenada County Jail	Securus	0.50	0.50	7.50
MS	Hancock County Adult Detention Center	Securus	0.50	0.50	7.50
MS	Harrison County Detention Center	Securus	0.50	0.50	7.50
MS	Humphreys County Jail	Securus	0.50	0.50	7.50
MS	Jackson County Adult Detention Center	Securus	0.50	0.50	7.50
MS	Jasper County Jail	Securus	0.50	0.50	7.50
MS	Jones County Jail	Securus	0.50	0.50	7.50
MS	Jones County Juvenile Detention Center	Securus	0.50	0.50	7.50
MS	Lafayette County Detention Center	Securus	0.50	0.50	7.50
MS	Lauderdale County Detention Facility	Securus	0.50	0.50	7.50
MS	Leake County Correctional Facility - County	Securus	0.50	0.50	7.50
MS	Leake County Correctional Facility - State	Securus	0.50	0.50	7.50
MS	Leflore County Jail	Securus	0.50	0.50	7.50
MS	Lincoln County Jail	Securus	0.50	0.50	7.50
MS	Lowndes County Adult Detention Center	Securus	0.50	0.50	7.50
MS	Lowndes County Courthouse Holding Cell	Securus	0.50	0.50	7.50
MS	Madison County Detention Center	Securus	0.50	0.50	7.50
MS	Neshoba County Detention Center	Securus	0.50	0.50	7.50

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
MS	Newton County Jail	Securus	0.50	0.50	7.50
MS	Oktibbeha County Jail	Securus	0.50	0.50	7.50
MS	Oktibbeha County Jail-Trustee Facility	Securus	0.50	0.50	7.50
MS	Panola County Detention Center	Securus	0.50	0.50	7.50
MS	Perry County Jail	Securus	0.50	0.50	7.50
MS	Picayune City Jail	Securus	0.50	0.50	7.50
MS	Pike County Detention Center	Securus	0.50	0.50	7.50
MS	Prentiss County Jail	Securus	0.50	0.50	7.50
MS	Scott County Jail	Securus	0.50	0.50	7.50
MS	Tate County Jail- JSI	Securus	0.50	0.50	7.50
MS	Tippah County Jail - JSI	Securus	0.50	0.50	7.50
MS	Tunica County Sheriff - JSI	Securus	0.50	0.50	7.50
MS	Union County Jail	Securus	0.50	0.50	7.50
MS	Walthall County Jail - JSI	Securus	0.50	0.50	7.50
MS	Warren County Jail	Securus	0.50	0.50	7.50
MS	Warren County Juvenile Facility	Securus	0.50	0.50	7.50
MS	Wayne County Jail	Securus	0.50	0.50	7.50
MS	Webster County Jail	Securus	0.50	0.50	7.50
MS	Yalobusha County Jail	Securus	0.50	0.50	7.50
NY	New York City Department of Corrections	Securus	0.50	0.50	1.20
NY	North Tonawanda Police Department	Securus	0.50	0.50	7.50
NY	Ontario County Jail	Securus	0.50	0.50	7.50
NY	Suffolk County Jail	Securus	0.50	0.50	7.50
NY	Suffolk County Jail / Yaphank	Securus	0.50	0.50	7.50
OK	Diamondback Correctional Facility – CCA	Securus	0.50	0.50	4.00
TX	Rockwall County Jail	Securus	0.50	0.50	7.50
IL	Kankakee County Jail	Securus	0.48	0.16	2.72
MI	Wayne County - Road Patrol Lockup Facility	Securus	0.48	0.48	7.20
AZ	CCA Florence Correctional Center (VTDOC)	Securus	0.47	0.10	1.87
AZ	Ak-Chin Police Department	Securus	0.47	0.40	6.07
AZ	Cochise County - All Locations	Securus	0.47	0.47	7.05
AZ	Greenlee County Sheriff	Securus	0.47	0.47	7.05
AZ	Yuma County Juvenile Justice Center	Securus	0.47	0.47	7.05
AZ	Apache County Jail	Securus	0.40	0.40	6.00
FL	Hardee County Jail	Securus	0.35	0.35	5.25
OH	Bedford Heights Police Department	Securus	0.35	0.24	3.71
CA	San Diego County – All Locations	Securus	0.32	0.32	4.80
TN	Marion County Jail	Securus	0.32	0.22	3.40
TX	Fort Bend County Correctional Facility	Securus	0.32	0.32	4.80
TX	Fort Bend County Juvenile Probation	Securus	0.32	0.32	4.80
ID	Benewah County Jail	Securus	0.31	0.31	4.65
TN	Decatur County Justice Complex	Securus	0.31	0.21	3.25

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
TN	Silverdale Detention Facilities – CCA	Securus	0.31	0.21	3.25
UT	Utah County Jail	Securus	0.29	0.29	4.35
SD	Pennington County Juvenile	Securus	0.28	0.28	4.20
TX	Bensmihen	Securus	0.27	0.27	4.05
TX	Dover	Securus	0.27	0.27	4.05
TX	Farrar	Securus	0.27	0.27	4.05
TX	Leboeuf	Securus	0.27	0.27	4.05
TX	Nicholson	Securus	0.27	0.27	4.05
TX	Rohr	Securus	0.27	0.27	4.05
MO	Threads Training 2	Securus	0.26	0.26	3.90
MO	Threads Training 3	Securus	0.26	0.26	3.90
TX	Denton County – All Locations	Securus	0.26	0.26	3.90
TX	Texas Department Of Criminal Justice	Securus	0.26	0.26	3.90
CT	Department of Corrections – All Locations	Securus	0.25	0.25	3.75
IA	Story County Jail	Securus	0.25	0.25	3.75
LA	Berwick City Police Department	Securus	0.25	0.25	3.75
LA	Cedarwood Manor	Securus	0.25	0.25	3.75
LA	Cedarwood Manor Women's	Securus	0.25	0.25	3.75
LA	Jefferson Parish (Gretna)	Securus	0.25	0.25	3.75
LA	Kenner Police Department	Securus	0.25	0.25	3.75
LA	Lafourche Parish – All Locations	Securus	0.25	0.25	3.75
LA	Morehouse Parish – All Locations	Securus	0.25	0.25	3.75
LA	Natchitoches Parish Work Center	Securus	0.25	0.25	3.75
LA	Orleans Parish – All Locations	Securus	0.25	0.25	3.75
LA	Slidell Police Department	Securus	0.25	0.25	3.75
LA	Terrebonne Parish Criminal Justice Complex	Securus	0.25	0.25	3.75
LA	Terrebonne Parish Trustee	Securus	0.25	0.25	3.75
MD	Queen Anne\ S County Detention Center	Securus	0.25	0.14	2.21
MD	Garrett County Sheriff	Securus	0.25	0.25	3.75
MD	Talbot County Detention Center	Securus	0.25	0.25	3.75
MD	Worcester County Detention Center	Securus	0.25	0.25	3.75
MN	Meeker County Jail	Securus	0.25	0.25	3.75
NC	Madison County Detention Center	Securus	0.25	0.25	3.75
UT	Summit County Jail	Securus	0.25	0.25	3.75
CA	San Joaquin County Jail	Securus	0.24	0.24	3.60
IN	Allen County Juvenile Justice Center	Securus	0.24	0.24	3.60
IN	Bartholomew County Jail	Securus	0.24	0.24	3.60
IN	Elkhart County – All Locations	Securus	0.24	0.24	3.60
IN	Floyd County Jail	Securus	0.24	0.24	3.60
IN	Hendricks County Work Release	Securus	0.24	0.24	3.60
IN	Johnson County Community Corrections	Securus	0.24	0.24	3.60
IN	Johnson County Sheriff	Securus	0.24	0.24	3.60

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
IN	Kosciusko County Jail	Securus	0.24	0.24	3.60
IN	Kosciusko County Work Release	Securus	0.24	0.24	3.60
IN	Laporte County Community Corrections	Securus	0.24	0.24	3.60
IN	Laporte County Jail	Securus	0.24	0.24	3.60
IN	Marion County Juvenile Detention Center	Securus	0.24	0.24	3.60
IN	Porter County Sheriff	Securus	0.24	0.24	3.60
IN	Tippecanoe County Community Corrections	Securus	0.24	0.24	3.60
IN	Vigo County Community Correctional Center	Securus	0.24	0.24	3.60
IN	Vigo County Jail	Securus	0.24	0.24	3.60
TX	Dallas County – All Locations	Securus	0.24	0.24	3.60
VA	Blue Ridge Regional Jail Authority	Securus	0.23	0.23	3.45
IA	Cass County Jail	Securus	0.22	0.22	3.30
IL	Knox County Jail	Securus	0.22	0.22	3.30
IN	Grant County – All Locations	Securus	0.22	0.22	3.30
IN	Madison County Sheriff	Securus	0.22	0.22	3.30
KY	Franklin County Fiscal Court	Securus	0.22	0.22	3.30
MD	Dorchester County Detention Center	Securus	0.22	0.22	3.30
NC	Avery County Sheriff	Securus	0.22	0.22	3.30
OH	Mercer County Sheriff	Securus	0.22	0.22	3.30
TX	Hall County Jail	Securus	0.22	0.22	3.30
TX	Hays County Juvenile Facility	Securus	0.22	0.22	3.30
UT	Cache County Jail	Securus	0.22	0.22	3.30
VA	Southampton County Jail	Securus	0.22	0.22	3.30
VA	Southampton County Jail Farm	Securus	0.22	0.22	3.30
WY	Crook County Detention Facility	Securus	0.22	0.22	3.30
AK	Department of Corrections – All Locations	Securus	0.21	0.21	3.15
AZ	CCA Central Arizona Detention Center	Securus	0.21	0.21	3.15
AZ	CCA Eloy Detention Center	Securus	0.21	0.21	3.15
AZ	CCA Florence Correctional Center	Securus	0.21	0.21	3.15
AZ	San Luis Regional Detention Center	Securus	0.21	0.21	3.15
FL	Columbia County Detention Facility	Securus	0.21	0.21	3.15
FL	Sarasota County Jail	Securus	0.21	0.21	3.15
KS	Leavenworth Detention Center – CCA	Securus	0.21	0.21	3.15
KY	Department of Corrections – All Locations	Securus	0.21	0.21	3.15
LA	Department of Corrections – All Locations	Securus	0.21	0.21	3.15
MA	Middlesex Billerica Hoc	Securus	0.21	0.21	3.15
MN	Northwest Regional Corrections Center	Securus	0.21	0.21	3.15
MS	Adams County Correctional Center - CCA	Securus	0.21	0.21	3.15
NJ	Cape May County Correctional Center	Securus	0.21	0.21	3.15
OH	Northeast Ohio Correctional Center - CCA	Securus	0.21	0.21	3.15
PA	Lancaster County Prison	Securus	0.21	0.21	3.15
PA	Lancaster County Youth Intervention Center	Securus	0.21	0.21	3.15

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
TN	West Tennessee Detention Facility – CCA	Securus	0.21	0.21	3.15
TX	Bell County Central Jail	Securus	0.21	0.21	3.15
TX	Bell County Loop Jail	Securus	0.21	0.21	3.15
TX	Eden Detention Center – CCA	Securus	0.21	0.21	3.15
TX	Limestone County Detention Center	Securus	0.21	0.21	3.15
TX	Limestone Old County Jail	Securus	0.21	0.21	3.15
TX	Rolling Plains Regional Jail & Detention Center	Securus	0.21	0.21	3.15
TX	West Texas Detention Facility	Securus	0.21	0.21	3.15
AR	Community Transitional Services - Pine Bluff	Securus	0.20	0.20	3.00
CA	San Bernardino County – All Locations	Securus	0.20	0.20	3.00
GA	Athens Clarke County Jail	Securus	0.19	0.19	2.85
GA	Athens Clarke Diversion Center	Securus	0.19	0.19	2.85
GA	Atkinson County Jail	Securus	0.19	0.19	2.85
GA	Baldwin County Jail	Securus	0.19	0.19	2.85
GA	Bibb County Annex - G Wing	Securus	0.19	0.19	2.85
GA	Bibb County Main Jail	Securus	0.19	0.19	2.85
GA	Bibb County New Jail	Securus	0.19	0.19	2.85
GA	Brantley County Jail	Securus	0.19	0.19	2.85
GA	Brooks County Jail	Securus	0.19	0.19	2.85
GA	Bryan County Sheriff	Securus	0.19	0.19	2.85
GA	Bulloch County Sheriff	Securus	0.19	0.19	2.85
GA	Catoosa County Jail	Securus	0.19	0.19	2.85
GA	Chattooga County Jail	Securus	0.19	0.19	2.85
GA	Clarke County Correctional Institution	Securus	0.19	0.19	2.85
GA	Dougherty County Jail	Securus	0.19	0.19	2.85
GA	Fannin County Jail	Securus	0.19	0.19	2.85
GA	Grady County Jail	Securus	0.19	0.19	2.85
GA	Harris County Prison	Securus	0.19	0.19	2.85
GA	Jackson County Jail	Securus	0.19	0.19	2.85
GA	Jefferson Correctional Institution	Securus	0.19	0.19	2.85
GA	Jefferson County	Securus	0.19	0.19	2.85
GA	Lincoln County Sheriff	Securus	0.19	0.19	2.85
GA	Macon County Jail	Securus	0.19	0.19	2.85
GA	Marion County Sheriff	Securus	0.19	0.19	2.85
GA	McDuffie County Sheriff	Securus	0.19	0.19	2.85
GA	McRae Correctional Facility – CCA	Securus	0.19	0.19	2.85
GA	Oglethorpe County Jail	Securus	0.19	0.19	2.85
GA	Richmond County Correctional Institution	Securus	0.19	0.19	2.85
GA	Stephens County Jail	Securus	0.19	0.19	2.85
GA	Stewart Detention Center – CCA	Securus	0.19	0.19	2.85
GA	Tattnall County Sheriff	Securus	0.19	0.19	2.85
GA	Tift County Law Enforcement Center	Securus	0.19	0.19	2.85

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
GA	Troup County Jail	Securus	0.19	0.19	2.85
GA	Walker County Sheriff	Securus	0.19	0.19	2.85
GA	Wilkes County Sheriff	Securus	0.19	0.19	2.85
GA	Wilkinson County Sheriff	Securus	0.19	0.19	2.85
GA	Barrow County Sheriff	Securus	0.18	0.18	2.70
GA	Clayton County Detention Center	Securus	0.18	0.18	2.70
GA	Dekalb County Jail	Securus	0.18	0.18	2.70
GA	Fayette County Jail	Securus	0.18	0.18	2.70
GA	Fulton County - Alpharetta Annex	Securus	0.18	0.18	2.70
GA	Fulton County - South Fulton Municipal Regional Jail	Securus	0.18	0.18	2.70
GA	Fulton County Jail	Securus	0.18	0.18	2.70
GA	Fulton County Jail - Marietta Annex	Securus	0.18	0.18	2.70
GA	Gwinnett County Sheriff	Securus	0.18	0.18	2.70
GA	Hall County Jail	Securus	0.18	0.18	2.70
GA	Henry County - Annex	Securus	0.18	0.18	2.70
GA	Henry County Jail	Securus	0.18	0.18	2.70
GA	Pike County Sheriff	Securus	0.18	0.18	2.70
GA	Rockdale County Sheriff	Securus	0.18	0.18	2.70
GA	Smyrna City Jail	Securus	0.18	0.18	2.70
IL	Lake County Adult Correctional Facility	Securus	0.18	0.18	2.70
OR	Multnomah County Detention Center	Securus	0.17	0.17	2.55
OR	Multnomah County Inverness Jail	Securus	0.17	0.17	2.55
OR	Multnomah County Juvenile Department	Securus	0.17	0.17	2.55
VA	Hampton Roads Regional Jail	Securus	0.17	0.17	2.55
AZ	Pinal County	Securus	0.16	0.16	2.40
GA	Carroll County Jail	Securus	0.16	0.16	2.40
IL	Kankakee County Jerome Combs Detention Center	Securus	0.16	0.16	2.40
LA	East Carroll Parish Female	Securus	0.16	0.16	2.40
LA	East Carroll Parish Male	Securus	0.16	0.16	2.40
LA	East Carroll Riverbend Detention Phase I	Securus	0.16	0.16	2.40
TN	Hardeman County Correctional Center – CCA	Securus	0.16	0.16	2.40
TN	Whiteville Correction Facility – CCA	Securus	0.16	0.16	2.40
AZ	Salt River Pima Maricopa Indian Community	Securus	0.15	0.15	2.25
NM	Chaves County Adult Detention Center	Securus	0.15	0.15	2.25
NM	Cibola County Correctional Center – CCA	Securus	0.15	0.15	2.25
NM	Curry County Detention Center	Securus	0.15	0.15	2.25
NM	De Baca County Detention Center	Securus	0.15	0.15	2.25
NM	Eddy County Adult Detention	Securus	0.15	0.15	2.25
NM	Eddy County Adult Women Detention Center	Securus	0.15	0.15	2.25
NM	Grant County Jail	Securus	0.15	0.15	2.25
NM	Hidalgo County Detention Center	Securus	0.15	0.15	2.25

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
NM	Hobbs Police Department City Jail	Securus	0.15	0.15	2.25
NM	Lea County Detention Center – GEO	Securus	0.15	0.15	2.25
NM	Los Alamos Police Department	Securus	0.15	0.15	2.25
NM	Otero County Jail	Securus	0.15	0.15	2.25
NM	Quay County Detention Center	Securus	0.15	0.15	2.25
NM	Rio Arriba County Detention Facility - JSI	Securus	0.15	0.15	2.25
NM	Roosevelt County Adult Detention Center	Securus	0.15	0.15	2.25
NM	San Juan County Adult Detention Center	Securus	0.15	0.15	2.25
NM	San Miguel County Detention Center	Securus	0.15	0.15	2.25
NM	Sierra County Detention	Securus	0.15	0.15	2.25
NM	Taos County Adult Detention Center	Securus	0.15	0.15	2.25
NM	Torrance County Detention Facility – CCA	Securus	0.15	0.15	2.25
NM	Vigil Maldonado Detention Center	Securus	0.15	0.15	2.25
WA	Pierce County Detention Corrections Center	Securus	0.15	0.15	2.25
WA	Pierce County Juvenile Detention Center	Securus	0.15	0.15	2.25
CA	Riverside County – All Locations	Securus	0.14	0.14	2.10
FL	Department of Corrections – All Locations	Securus	0.14	0.14	2.10
KY	Lexington Fayette Urban Detention	Securus	0.14	0.14	2.10
MN	Hennepin County – All Locations	Securus	0.14	0.14	2.10
NM	Lincoln County Detention Center	Securus	0.14	0.14	2.10
TX	Travis County – All Locations	Securus	0.14	0.14	2.10
IL	Cook County Facilities	Securus	0.13	0.13	1.95
WA	King County – All Locations	Securus	0.13	0.13	1.95
FL	Lake City Correctional Facility - CCA	Securus	0.12	0.12	1.80
NM	Sandoval County Detention Center - JSI	Securus	0.12	0.12	1.80
SC	Georgetown County Detention Center	Securus	0.12	0.12	1.80
WI	Department of Corrections – All Locations	Securus	0.12	0.12	1.80
WI	Juneau County Justice Center	Securus	0.12	0.12	1.80
WI	Oneida County Jail	Securus	0.12	0.12	1.80
MS	Tallahatchie County Correctional – CCA	Securus	0.10	0.10	1.50
NM	Valencia County Detention Center	Securus	0.10	0.10	1.50
TX	T. Don Hutto Residential Center - CCA	Securus	0.09	0.09	1.35
ND	Department of Corrections – All Locations	Securus	0.08	0.08	1.20
NM	Bernalillo County Metro Detention Center	Securus	0.08	0.08	1.20
NM	Bernalillo County Youth Services Center	Securus	0.08	0.08	1.20
NM	Guadalupe Correctional Facility - GEO	Securus	0.08	0.08	1.20
NM	Lea Hobbs County - GEO	Securus	0.08	0.08	1.20
NM	Department of Corrections – All Locations	Securus	0.08	0.08	1.20
NM	NM Women's Correctional Facility – CCA	Securus	0.08	0.08	1.20
NM	Northeastern NM Detention Facility – GEO	Securus	0.08	0.08	1.20
NM	Santa Fe County Adult Detention Facility	Securus	0.08	0.08	1.20
FL	Gadsden Correctional Facility - MTC	Securus	0.06	0.06	0.90

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
PA	Department of Corrections – All Locations	Securus	0.06	0.06	0.90
MO	Department of Corrections – All Locations	Securus	0.05	0.05	0.75

EXHIBIT C

Intra-State Rates for ICS Providers
(collected November 28 – December 12, 2016)

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
OR	Douglas County	GTL	5.31	0.89	17.77
OR	Linn County	GTL	5.24	0.69	14.90
AR	Washington County AR Jail	GTL	5.00	0.00	5.00
TX	Cass County Detention Center	GTL	4.65	0.20	7.45
AR	Jefferson County Adult Jail	GTL	4.64	0.69	14.30
VA	Culpeper County	GTL	4.64	0.69	14.30
WI	Clark County Jail	GTL	4.64	0.69	14.30
MI	Monroe County, MI	GTL	4.60	0.65	13.70
IN	Marion County Superior Court Juvenile	GTL	4.45	0.00	4.45
NY	Allegany County	GTL	4.35	0.40	9.95
NY	Broome County	GTL	4.35	0.40	9.95
NY	Cattaraugus County	GTL	4.35	0.40	9.95
NY	Cayuga County	GTL	4.35	0.40	9.95
NY	Chautauqua County	GTL	4.35	0.40	9.95
NY	Chenango County	GTL	4.35	0.40	9.95
NY	Cortland County	GTL	4.35	0.40	9.95
NY	Cortland County	GTL	4.35	0.40	9.95
NY	Delaware County	GTL	4.35	0.40	9.95
NY	Dutchess County	GTL	4.35	0.40	9.95
NY	Genesee County	GTL	4.35	0.40	9.95
NY	Herkimer County	GTL	4.35	0.40	9.95
NY	Jefferson County	GTL	4.35	0.40	9.95
NY	Lewis County	GTL	4.35	0.40	9.95
NY	Livingston County	GTL	4.35	0.40	9.95
NY	Madison County	GTL	4.35	0.40	9.95
NY	Monroe County	GTL	4.35	0.40	9.95
NY	Nassau County	GTL	4.35	0.40	9.95
NY	Niagra County	GTL	4.35	0.40	9.95
NY	Oneida County	GTL	4.35	0.40	9.95
NY	Onondaga County	GTL	4.35	0.40	9.95
NY	Orange County	GTL	4.35	0.40	9.95
NY	Orleans County	GTL	4.35	0.40	9.95
NY	Oswego County	GTL	4.35	0.40	9.95
NY	Otsego County	GTL	4.35	0.40	9.95
NY	Putnam County	GTL	4.35	0.40	9.95
NY	Renssalaer County	GTL	4.35	0.40	9.95
NY	Rockland County	GTL	4.35	0.40	9.95
NY	Schuyler County	GTL	4.35	0.40	9.95

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
NY	Seneca County	GTL	4.35	0.40	9.95
NY	St. Lawrence County	GTL	4.35	0.40	9.95
NY	St. Lawrence County	GTL	4.35	0.40	9.95
NY	Sullivan County	GTL	4.35	0.40	9.95
NY	Tioga County	GTL	4.35	0.40	9.95
NY	Tompkins County	GTL	4.35	0.40	9.95
NY	Tompkins County	GTL	4.35	0.40	9.95
NY	Wayne County	GTL	4.35	0.40	9.95
NY	Westchester County	GTL	4.35	0.40	9.95
NY	Wyoming County	GTL	4.35	0.40	9.95
NY	Yates County	GTL	4.35	0.40	9.95
TX	Bowie County	GTL	4.17	0.40	9.80
TX	Red River County	GTL	4.15	0.39	9.54
TX	Burnet County	GTL	4.10	0.34	8.86
AR	White County Jail	GTL	4.09	0.29	8.15
TX	Waller County	GTL	4.05	0.33	8.67
MI	Oakland County	GTL	4.00	0.50	11.00
AR	Sebastian County Jail	GTL	3.75	0.25	7.25
AZ	Mesa City Holding Facility	GTL	3.70	0.30	7.90
CA	Alameda County – All Locations	GTL	3.65	0.65	12.75
CA	Marin County Probation	GTL	3.65	0.65	12.75
MI	Detroit City Jail	GTL	3.65	0.65	12.75
PA	Wayne County	GTL	3.59	0.59	11.85
PA	Jefferson County	GTL	3.55	0.55	11.25
TX	Gregg County	GTL	3.40	0.39	8.86
MS	Coahoma County	GTL	3.25	0.25	6.75
MS	Covington County	GTL	3.25	0.25	6.75
MS	Holmes-Humphrey County	GTL	3.25	0.25	6.75
MS	Issaquena County	GTL	3.25	0.25	6.75
MS	Jefferson-Franklin County	GTL	3.25	0.25	6.75
MS	Kemper-Neshoba County	GTL	3.25	0.25	6.75
MS	Marion-Walthall County	GTL	3.25	0.25	6.75
MS	Pike County	GTL	3.25	0.25	6.75
MS	Washington County	GTL	3.25	0.25	6.75
MS	Winston-Choctaw County	GTL	3.25	0.25	6.75
OK	Ponca City Jail	GTL	3.20	0.25	6.70
OH	Jefferson County	GTL	3.11	0.36	8.15
UT	Sanpete County	GTL	2.92	0.12	4.60
NJ	Hunterdon County	GTL	2.90	0.40	8.50
NY	Chemung County Sheriff's Office	GTL	2.90	0.40	8.50
SC	Greenville County	GTL	2.83	0.33	7.45

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
MS	Leake County	GTL	2.71	0.21	5.65
GA	South Fulton	GTL	2.70	0.00	2.70
IN	Delaware County, IN	GTL	2.55	0.30	6.75
LA	Concordia Parish	GTL	2.30	0.15	4.40
LA	Jackson Correctional Center	GTL	2.24	0.09	3.50
GA	Pelham County	GTL	2.19	0.19	4.85
OR	Multnomah County	GTL	1.96	0.11	3.50
NY	Columbia County	GTL	1.95	0.20	4.75
NY	Essex County	GTL	1.95	0.20	4.75
NY	Franklin County	GTL	1.95	0.20	4.75
NY	Fulton County	GTL	1.95	0.20	4.75
NY	Montgomery County	GTL	1.95	0.20	4.75
NY	Warren County	GTL	1.95	0.20	4.75
NY	Warren County	GTL	1.95	0.20	4.75
NY	Washington County	GTL	1.95	0.20	4.75
NY	Albany County	GTL	1.85	0.10	3.25
NY	Saratoga County	GTL	1.85	0.10	3.25
NY	Schenectady County	GTL	1.85	0.10	3.25
MO	Greene County	GTL	1.82	0.32	6.30
NY	Clinton County	GTL	1.76	0.18	4.28
NY	Greene County	GTL	1.76	0.18	4.28
IN	Monroe County Jail	GTL	1.75	0.25	5.25
TX	Joe Corley Detention – GEO	GTL	1.75	0.25	5.25
RI	Providence County	GTL	1.65	0.30	5.85
TN	Williamson County	GTL	1.50	0.00	1.50
MI	Berrien County	GTL	1.10	1.10	16.50
MI	Lenaewee County	GTL	1.09	1.09	16.35
UT	Box Elder County	GTL	1.00	0.04	1.56
MI	Hillsdale County	GTL	0.99	0.99	14.85
MI	Lake County Jail, MI	GTL	0.75	0.75	11.25
MS	Pontotc County DC	GTL	0.73	0.73	10.95
MS	Wilkinson County Correctional CCI	GTL	0.69	0.69	10.35
MS	Bolivar County	GTL	0.68	0.68	10.14
IN	Clay County-IN	GTL	0.67	0.67	10.05
MI	Oceana County Jail	GTL	0.67	0.67	10.05
MD	Montgomery County	GTL	0.65	0.00	0.65
MS	Lawrence County	GTL	0.58	0.58	8.70
MS	Carroll-Montgomery County	GTL	0.57	0.57	8.50
MS	George-Greene County Jail	GTL	0.56	0.56	8.43
KS	Riley County	GTL	0.55	0.55	8.25
TX	Wichita County	GTL	0.55	0.55	8.25

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
WI	Menominee County - Tribal Jail	GTL	0.55	0.55	8.25
TX	Jones County	GTL	0.53	0.53	8.00
TX	Montgomery County	GTL	0.53	0.53	7.95
TX	Pasadena City Jail	GTL	0.53	0.53	7.95
TX	Johnson County	GTL	0.52	0.52	7.80
MI	Oak Park MI - City Jail	GTL	0.50	0.50	7.50
TX	Corpus Christi	GTL	0.50	0.50	7.50
TX	Karnes County Panna Maria Ave Jail	GTL	0.50	0.50	7.50
TX	Karnes County Wall St Jail	GTL	0.50	0.50	7.50
TX	Pecos County	GTL	0.50	0.50	7.50
WI	Kenosha County Detention Center	GTL	0.50	0.50	7.50
MS	Natchez City Jail	GTL	0.49	0.49	7.35
MS	Natchez City Jail - Adams Juvenile	GTL	0.49	0.49	7.35
TX	Colorado County	GTL	0.49	0.49	7.35
TX	Duncanville	GTL	0.49	0.49	7.35
TX	Gonzales County - Inter Sanction ISF	GTL	0.49	0.49	7.35
TX	Guadalupe County	GTL	0.49	0.49	7.35
TX	Jefferson County – All Corrections	GTL	0.49	0.49	7.35
TX	Potter County	GTL	0.49	0.49	7.35
TX	Randall County	GTL	0.49	0.49	7.35
TX	Reeves County	GTL	0.49	0.49	7.35
TX	Rusk County	GTL	0.49	0.49	7.35
TX	Wilbarger County	GTL	0.49	0.49	7.35
CA	Merced County – All Locations	GTL	0.48	0.48	7.20
TX	Arlington	GTL	0.47	0.47	7.05
TX	Lee County	GTL	0.47	0.47	7.05
TX	Washington County	GTL	0.47	0.47	7.05
AZ	Gila County – All Locations	GTL	0.46	0.46	6.90
TX	Lubbock County Community Corr	GTL	0.46	0.46	6.90
MS	Hinds County – All Locations	GTL	0.45	0.45	6.72
TX	Hidalgo County	GTL	0.45	0.45	6.75
TX	Hill County	GTL	0.45	0.45	6.75
CO	El Paso County – All Locations	GTL	0.44	0.44	6.60
TX	Smith County	GTL	0.44	0.44	6.60
CA	Humboldt County – All Locations	GTL	0.42	0.42	6.30
TX	Maverick County	GTL	0.41	0.41	6.15
TX	Tom Green County	GTL	0.41	0.41	6.10
CA	El Dorado County – All Locations	GTL	0.40	0.40	6.00
CA	Glenn County Sheriff Department	GTL	0.40	0.40	6.00
CA	Marin County Jail	GTL	0.40	0.40	6.00
TX	Gonzales County	GTL	0.40	0.40	6.00

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
TX	Galveston County	GTL	0.39	0.39	5.85
TX	Hood County	GTL	0.39	0.39	5.85
PA	Lycoming County	GTL	0.37	0.37	5.55
FL	Polk County – All Locations	GTL	0.36	0.36	5.40
MO	Buchanan County	GTL	0.36	0.36	5.40
MS	Alcorn County - Regional Jail	GTL	0.36	0.36	5.34
OH	Brook Park	GTL	0.36	0.36	5.40
OH	East Cleveland	GTL	0.36	0.36	5.40
OH	Lakewood Jail	GTL	0.36	0.36	5.40
OH	Parma Heights Jail	GTL	0.36	0.36	5.40
OH	Richmond Heights Jail	GTL	0.36	0.36	5.40
OH	Solon Jail	GTL	0.36	0.36	5.40
OH	Westlake Jail	GTL	0.36	0.36	5.40
OH	Zanesville Jail	GTL	0.36	0.36	5.40
TX	McLennan County – All Locations	GTL	0.35	0.35	5.25
OH	Lake County Adult Detention Facility	GTL	0.34	0.34	5.10
PA	Armstrong County	GTL	0.34	0.34	5.10
PA	Bucks County	GTL	0.33	0.33	4.89
IN	Madison County – Justice Center	GTL	0.32	0.32	4.80
IN	Madison County – Men's and Women's WR	GTL	0.32	0.32	4.80
CA	Kern County – All Locations	GTL	0.31	0.31	4.65
CA	Ventura County - Juvenile Probation	GTL	0.31	0.31	4.65
CA	Ventura County Jail	GTL	0.31	0.31	4.65
FL	Manatee County Detention	GTL	0.30	0.30	4.50
OH	SEPTA Correctional Facility	GTL	0.30	0.30	4.50
PA	Westmoreland County	GTL	0.30	0.30	4.50
CA	Lake County Jail – All Locations	GTL	0.29	0.29	4.35
CA	Los Angeles County	GTL	0.29	0.29	4.35
CA	Los Angeles Police Department	GTL	0.29	0.29	4.35
CA	Mendota FCI	GTL	0.29	0.29	4.35
CA	Orange County, CA	GTL	0.29	0.29	4.35
CA	San Benito County	GTL	0.29	0.29	4.35
CA	San Bernardino County Juvenile	GTL	0.29	0.29	4.35
CA	San Diego MCC	GTL	0.29	0.29	4.35
CA	San Francisco County Jail	GTL	0.29	0.29	4.35
CA	San Luis Obispo County	GTL	0.29	0.29	4.35
CA	Santa Clara County	GTL	0.29	0.29	4.35
CA	Shafter Community Correctional (CCF)	GTL	0.29	0.29	4.35
CA	Shasta County	GTL	0.29	0.29	4.35
CA	Tehama County Jail	GTL	0.29	0.29	4.35
CA	Terminal Island FCI	GTL	0.29	0.29	4.35

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
CA	Tulare County	GTL	0.29	0.29	4.35
CA	USMC Camp Pendleton Brig	GTL	0.29	0.29	4.35
CA	USN_CA-USMC Miramar NAVONBRIG	GTL	0.29	0.29	4.35
CA	Victorville USP	GTL	0.29	0.29	4.35
CA	Yolo County Jail	GTL	0.29	0.29	4.35
CA	Yuba County Jail	GTL	0.29	0.29	4.35
NH	Strafford County Department of Corrections	GTL	0.29	0.29	4.35
FL	Duval County – All Locations	GTL	0.28	0.28	4.20
TN	Madison County	GTL	0.28	0.28	4.20
VA	Mecklenburg Jail	GTL	0.28	0.28	4.20
VA	Meherin River County Regional Jail	GTL	0.28	0.28	4.20
WA	Thurston County - Nisqually Tribal Jail	GTL	0.28	0.28	4.20
PA	Clearfield County	GTL	0.27	0.27	4.05
TX	Gaines County	GTL	0.27	0.27	4.05
FL	Martin County	GTL	0.26	0.26	3.90
IN	Marion County – Main Jail	GTL	0.26	0.26	3.90
MS	Rankin County - Adult	GTL	0.26	0.26	3.94
MS	Rankin County - Juvenile	GTL	0.26	0.26	3.94
WA	Issaquah City Jail	GTL	0.26	0.26	3.90
WA	Spokane County - Geiger Correctional	GTL	0.26	0.26	3.90
WA	Spokane County Jail	GTL	0.26	0.26	3.90
CA	Contra Costa County – All Locations	GTL	0.25	0.25	3.75
CA	Sonoma County	GTL	0.25	0.25	3.75
CA	Sonoma County - Juvenile Justice Center	GTL	0.25	0.25	3.75
FL	Brevard County	GTL	0.25	0.25	3.75
FL	St. Lucie County	GTL	0.25	0.25	3.75
MD	Caroline County Department of Corrections	GTL	0.25	0.25	3.75
NJ	Union County Jail	GTL	0.25	0.25	3.75
NJ	Union County Juvenile	GTL	0.25	0.25	3.75
NY	Rikers Island	GTL	0.25	0.25	3.75
OR	Columbus County	GTL	0.25	0.25	3.75
PA	Cambria County	GTL	0.25	0.25	3.75
PA	Delaware County	GTL	0.25	0.25	3.75
PA	Schuykill County	GTL	0.25	0.25	3.75
PA	Washington County	GTL	0.25	0.25	3.75
PA	York County	GTL	0.25	0.25	3.75
PA	York County	GTL	0.25	0.25	3.75
SC	Richland County	GTL	0.25	0.25	3.75
TN	Montgomery County	GTL	0.25	0.25	3.75
VA	Piedmont Regional Jail	GTL	0.25	0.25	3.75
VA	Prince William County	GTL	0.25	0.25	3.75

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
VA	Western Tidewater Regional Jail	GTL	0.25	0.25	3.75
FL	Pinellas County	GTL	0.24	0.24	3.60
IN	Allen County IN-Work Release	GTL	0.24	0.24	3.60
IN	Department of Corrections – All Locations	GTL	0.24	0.24	3.60
IN	Howard County, IN	GTL	0.24	0.24	3.60
IN	Lake County – Community Corrections	GTL	0.24	0.24	3.60
IN	St. Joseph County Jail	GTL	0.24	0.24	3.60
IN	Tippecanoe County Jail	GTL	0.24	0.24	3.60
OH	Delaware County	GTL	0.24	0.24	3.60
OH	Muskingum County Jail	GTL	0.24	0.24	3.60
PA	Adams County	GTL	0.24	0.24	3.60
PA	Bradford County	GTL	0.24	0.24	3.60
PA	Lehigh County	GTL	0.24	0.24	3.60
VA	Rappahannock Regional Jail	GTL	0.24	0.24	3.60
CA	Stanislaus County – All Locations	GTL	0.23	0.23	3.45
OH	Montgomery County – MonDay Correctional	GTL	0.23	0.23	3.45
OH	Stark County Regional Corrections	GTL	0.23	0.23	3.45
TX	Lubbock County Detention Ctr	GTL	0.23	0.23	3.45
VA	Hanover County	GTL	0.23	0.23	3.45
VA	New River Valley	GTL	0.23	0.23	3.45
AZ	Glendale City Jail	GTL	0.22	0.22	3.30
FL	Indian River County	GTL	0.22	0.22	3.30
FL	Lee County – All Locations	GTL	0.22	0.22	3.30
IA	Black Hawk County Jail	GTL	0.22	0.22	3.30
OH	Cleveland – House of Corrections	GTL	0.22	0.22	3.30
OH	Trumbull County	GTL	0.22	0.22	3.30
OH	Trumbull County – Juvenile	GTL	0.22	0.22	3.30
PA	Dauphin County	GTL	0.22	0.22	3.30
PA	Franklin County	GTL	0.22	0.22	3.30
PA	Mercer County	GTL	0.22	0.22	3.30
PA	Somerset County	GTL	0.22	0.22	3.30
TN	Obion County	GTL	0.22	0.22	3.30
TX	Houston County – All Locations	GTL	0.22	0.22	3.30
UT	Duchesne County	GTL	0.22	0.22	3.30
VA	Peumansend Creek Regional Jail	GTL	0.22	0.22	3.30
WI	Sauk County Jail	GTL	0.22	0.22	3.30
AL	Fayette County Jail	GTL	0.21	0.21	3.15
AL	Jefferson County – All Locations	GTL	0.21	0.21	3.15
AZ	APACHE Junction AZ- City Detention Unit	GTL	0.21	0.21	3.15
AZ	Avondale City Detention Facility	GTL	0.21	0.21	3.15
AZ	CCA Saguaro Correctional Center	GTL	0.21	0.21	3.15

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
AZ	Chandler City Detention Facility	GTL	0.21	0.21	3.15
AZ	Mohave County Juvenile Detention Center	GTL	0.21	0.21	3.15
CA	CADOC – Custody to Community Transitional Reentry Program	GTL	0.21	0.21	3.15
CA	San Joaquin County Juvenile Detention	GTL	0.21	0.21	3.15
FL	Santa Rosa County FL-Work Release	GTL	0.21	0.21	3.15
GA	East Point Law Enforcement Center Georgia	GTL	0.21	0.21	3.15
IL	DuPage County Corrections	GTL	0.21	0.21	3.15
IL	Peoria County IL-Jail	GTL	0.21	0.21	3.15
IN	Heritage Trails Correctional Facility - GEO	GTL	0.21	0.21	3.15
KS	JRFC Ft. Leavenworth	GTL	0.21	0.21	3.15
KS	USDB Ft. Leavenworth	GTL	0.21	0.21	3.15
MA	Plymouth County	GTL	0.21	0.21	3.15
NC	GEO Rivers Correctional	GTL	0.21	0.21	3.15
NJ	Hudson County Juvenile Detention	GTL	0.21	0.21	3.15
NY	Queens Detention Facility – GEO	GTL	0.21	0.21	3.15
OK	Great Plains Correctional Facility - GEO	GTL	0.21	0.21	3.15
PA	Allegheny County	GTL	0.21	0.21	3.15
PA	Lackawanna County	GTL	0.21	0.21	3.15
TX	Big Spring – GEO	GTL	0.21	0.21	3.15
TX	Central Texas Detention – GEO	GTL	0.21	0.21	3.15
TX	Karnes Correctional Center – GEO	GTL	0.21	0.21	3.15
TX	Rio Grande Detention – GEO	GTL	0.21	0.21	3.15
TX	Val Verde Correctional – GEO	GTL	0.21	0.21	3.15
AZ	Maricopa County – All Locations	GTL	0.20	0.20	3.00
AZ	Pima County - All Locations	GTL	0.20	0.20	3.00
MI	Department of Corrections – All Locations	GTL	0.20	0.20	3.00
OH	Mahoning County – All Locations	GTL	0.20	0.20	3.00
OK	Cimarron Correctional-Cushing	GTL	0.20	0.20	3.00
OK	Department of Corrections – All Locations	GTL	0.20	0.20	3.00
OK	Lawton Correctional – GEO	GTL	0.20	0.20	3.00
OR	Warm Springs	GTL	0.20	0.20	3.00
TN	Sevier County	GTL	0.20	0.20	3.00
WA	Snohomish County - Denney Juvenile	GTL	0.20	0.20	3.00
WA	Snohomish County - Main Jail	GTL	0.20	0.20	3.00
KS	Leavenworth County Jail	GTL	0.19	0.19	2.85
MS	Pearl River County	GTL	0.19	0.19	2.85
NJ	Salem County Correctional Facility	GTL	0.19	0.19	2.85
TN	Fayette County	GTL	0.19	0.19	2.85
UT	Weber County	GTL	0.19	0.19	2.82
VA	Northwestern County	GTL	0.19	0.19	2.85

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
WA	Grant County - County Jail	GTL	0.19	0.19	2.85
SD	Pennington County	GTL	0.18	0.17	2.62
LA	Ouachita Parish Correctional	GTL	0.18	0.18	2.70
VA	Southside Regional Jail	GTL	0.18	0.18	2.70
VA	Southwestern Regional Jail	GTL	0.18	0.18	2.70
OH	Cuyahoga County	GTL	0.18	0.19	2.78
GA	Department of Corrections – All Locations	GTL	0.17	0.17	2.55
PA	Montgomery County	GTL	0.17	0.17	2.55
PA	Philadelphia County	GTL	0.17	0.17	2.58
VA	Gloucester County	GTL	0.17	0.17	2.55
VA	Norfolk City	GTL	0.16	0.15	2.32
CA	Solano County	GTL	0.16	0.16	2.40
CA	Solano Probation Juvenile Hall	GTL	0.16	0.16	2.40
FL	Charlotte County	GTL	0.16	0.16	2.40
FL	Collier County	GTL	0.16	0.16	2.40
FL	Highlands County FL-Jail	GTL	0.16	0.16	2.40
IA	Scott County Jail	GTL	0.16	0.16	2.40
MA	Norfolk County Jail	GTL	0.16	0.16	2.40
NC	Cumberland County	GTL	0.16	0.16	2.40
NC	Durham County	GTL	0.16	0.16	2.40
OR	Yamhill County	GTL	0.16	0.16	2.40
PA	Chester County	GTL	0.16	0.16	2.40
PA	Luzerne County	GTL	0.16	0.16	2.40
PA	Northampton County	GTL	0.16	0.16	2.40
SC	Spartanburg County	GTL	0.16	0.16	2.40
TN	Department of Corrections – All Locations	GTL	0.16	0.16	2.40
WI	Outagamie County Jail	GTL	0.16	0.16	2.40
NJ	Delaney Hall – ICE (CEC, Inc.)	GTL	0.15	0.15	2.25
NM	Cibola County Detention Center	GTL	0.15	0.15	2.25
NM	Luna County	GTL	0.15	0.15	2.25
VA	Portsmouth Jail	GTL	0.15	0.15	2.25
CA	CADOC – CA Department of Corrections – All Locations	GTL	0.14	0.13	2.02
NJ	Toller Hall / Logan Hall – CEC, Inc.	GTL	0.14	0.13	2.02
FL	Miami-Dade County – All Locations	GTL	0.14	0.14	2.10
FL	Orange County Jail	GTL	0.14	0.14	2.10
NV	Washoe County Jail Main Jail	GTL	0.14	0.14	2.10
NV	Washoe County Jan Evans JDF	GTL	0.14	0.14	2.10
PA	Cumberland County	GTL	0.14	0.14	2.10
PA	Pennsylvania County	GTL	0.14	0.14	2.10
SC	Charleston County	GTL	0.14	0.14	2.10

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
TN	Shelby County	GTL	0.14	0.14	2.10
GA	Gwinnett County, GA- Correctional Complex	GTL	0.13	0.13	1.95
HI	Department of Corrections – All Locations	GTL	0.13	0.13	1.95
NE	Douglas County DOC	GTL	0.13	0.13	1.95
NE	Douglas County Youth Center	GTL	0.13	0.13	1.95
OH	Lucas County	GTL	0.13	0.13	1.95
VA	Henrico County Regional Jails	GTL	0.13	0.13	1.94
VA	Middle River County Regional Jail	GTL	0.13	0.13	1.94
CO	Arkansas Valley (AVCF)	GTL	0.12	0.12	1.80
CO	Bent County Correctional (BCCF)	GTL	0.12	0.12	1.80
CO	Buena Vista Correctional (BVCC)	GTL	0.12	0.12	1.80
CO	Canon Minimum Centers (CMC)	GTL	0.12	0.12	1.80
CO	Centennial Correctional (CCF)	GTL	0.12	0.12	1.80
CO	Cheyenne Mountare-Entry (CMRC)	GTL	0.12	0.12	1.80
CO	Colorado Correctional Center	GTL	0.12	0.12	1.80
CO	Colorado DOC – Youthful Offender System	GTL	0.12	0.12	1.80
CO	Colorado State Penitentiary	GTL	0.12	0.12	1.80
CO	Colorado State Penitentiary II	GTL	0.12	0.12	1.80
CO	Colorado Territorial Correctional Facility	GTL	0.12	0.12	1.80
CO	Crowley County Correctional Facility - CCA	GTL	0.12	0.12	1.80
CO	Delta Correctional Center	GTL	0.12	0.12	1.80
CO	Denver R and D Center (DRDC)	GTL	0.12	0.12	1.80
CO	Denver Women's Correctional (DWCF)	GTL	0.12	0.12	1.80
CO	Fremont Correctional (FCF)	GTL	0.12	0.12	1.80
CO	La Vista Correctional Facility	GTL	0.12	0.12	1.80
CO	Limon Correctional Facility	GTL	0.12	0.12	1.80
CO	Rifle Correctional Center	GTL	0.12	0.12	1.80
CO	San Carlos Correctional Facility	GTL	0.12	0.12	1.80
CO	Sterling Correctional Facility	GTL	0.12	0.12	1.80
CO	Trinidad Correctional Facility	GTL	0.12	0.12	1.80
GA	Cobb County, GA	GTL	0.12	0.12	1.80
MA	Hampden County - Alcohol Center	GTL	0.12	0.12	1.80
MA	Hampden County - Pre-release Center	GTL	0.12	0.12	1.80
MA	Hampden County - Regional Women's Center	GTL	0.12	0.12	1.80
NC	Mecklenberg County Jail Central	GTL	0.12	0.12	1.74
NC	Mecklenberg County Jail North	GTL	0.12	0.12	1.74
TN	Robertson County	GTL	0.12	0.12	1.80
VT	Department of Corrections - All Locations	GTL	0.12	0.12	1.76
WV	Central Regional Jail	GTL	0.12	0.12	1.80
WV	Eastern Regional Jail	GTL	0.12	0.12	1.80
WV	North Central Regional Jail	GTL	0.12	0.12	1.80

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
WV	Northern Regional Jail	GTL	0.12	0.12	1.80
WV	Potomac Highlands Jail	GTL	0.12	0.12	1.80
WV	South Central Regional Jail	GTL	0.12	0.12	1.80
WV	South West Regional Jail	GTL	0.12	0.12	1.80
WV	Tygart Valley Jail	GTL	0.12	0.12	1.80
WV	Western Regional Jail	GTL	0.12	0.12	1.80
CO	Colorado Youth Corrections – All Locations	GTL	0.11	0.11	1.65
FL	Blackwater River Facility (GEO)	GTL	0.11	0.11	1.65
FL	GEO Bay Correctional Facility	GTL	0.11	0.11	1.65
FL	GEO Graceville Correctional Facility	GTL	0.11	0.11	1.65
FL	GEO Moore Haven Correctional Facility	GTL	0.11	0.11	1.65
GA	Clarke County GA- Jail	GTL	0.11	0.11	1.65
IA	Iowa State Training School	GTL	0.11	0.11	1.65
MI	Northlake Detention VT DOC – GEO	GTL	0.11	0.11	1.65
MI	Northlake Detention WA DOC - GEO	GTL	0.11	0.11	1.65
MS	Chickasaw County	GTL	0.11	0.11	1.65
MS	Department of Corrections – All Locations	GTL	0.11	0.11	1.65
OK	Muskogee County	GTL	0.11	0.11	1.65
TX	Reeves County Detention – GEO	GTL	0.11	0.11	1.65
VA	Chesterfield County	GTL	0.11	0.11	1.65
VA	Riverside District Regional Jail	GTL	0.11	0.11	1.65
WA	Department of Corrections – All Locations	GTL	0.11	0.11	1.65
MA	Department of Corrections - All Locations	GTL	0.10	0.10	1.50
NC	Department of Adult Corrections – All Locations	GTL	0.10	0.10	1.50
NC	Department of Public Safety – All Locations	GTL	0.10	0.10	1.50
NE	Department of Corrections – All Locations	GTL	0.10	0.10	1.50
NJ	Bo Robinson – CEC, Inc.	GTL	0.10	0.10	1.53
NJ	Delaney Hall – CEC, Inc.	GTL	0.10	0.10	1.44
TN	Wilson County	GTL	0.10	0.10	1.50
TX	El Paso County	GTL	0.09	0.09	1.35
NJ	Talbot Hall – CEC, Inc.	GTL	0.08	0.08	1.24
SC	Department of Corrections – All Locations	GTL	0.08	0.08	1.20
SD	Department of Corrections – All Locations	GTL	0.08	0.08	1.20
NJ	Tulley House – CEC, Inc.	GTL	0.07	0.07	1.04
VA	Richmond Jail	GTL	0.07	0.07	1.05
DE	Department of Corrections – All Locations	GTL	0.05	0.05	0.75
MN	Department of Corrections – All Locations	GTL	0.05	0.05	0.75
NJ	Burlington County	GTL	0.05	0.05	0.76
NJ	Camden County	GTL	0.05	0.05	0.76
NJ	Cumberland County	GTL	0.05	0.05	0.76

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
NJ	Essex County Jail	GTL	0.05	0.05	0.76
NJ	Essex County Juvenile Detention	GTL	0.05	0.05	0.76
NJ	Hudson County Jail	GTL	0.05	0.05	0.76
NJ	Hudson County Jail Annex	GTL	0.05	0.05	0.76
NJ	Mercer County	GTL	0.05	0.05	0.76
NJ	Middlesex County Adult Correctional	GTL	0.05	0.05	0.76
NJ	Middlesex County Juvenile Detention	GTL	0.05	0.05	0.76
NJ	Monmouth County	GTL	0.05	0.05	0.76
NJ	Morris County	GTL	0.05	0.05	0.76
NJ	Ocean County	GTL	0.05	0.05	0.76
NJ	Somerset County	GTL	0.05	0.05	0.76
NJ	Sussex County	GTL	0.05	0.05	0.76
NJ	Warren County	GTL	0.05	0.05	0.76
NY	Bayview Correctional Facility	GTL	0.05	0.05	0.72
NY	Beacon Correctional Facility	GTL	0.05	0.05	0.72
NY	Butler ASACSC Correctional	GTL	0.05	0.05	0.72
NY	Chateaugay Correctional Facility	GTL	0.05	0.05	0.72
NY	Department of Corrections – All Locations	GTL	0.05	0.05	0.72
NY	Green Haven Correctional Facility	GTL	0.05	0.05	0.72
NY	Monterey Correctional Facility	GTL	0.05	0.05	0.72
NY	Mt McGregor Correctional Facility	GTL	0.05	0.05	0.72
NY	Taconic County	GTL	0.05	0.05	0.72
OH	Department of Rehab. And Corrections – All Locations	GTL	0.05	0.05	0.75
OH	Department of Youth Services – All Locations	GTL	0.05	0.05	0.75
OH	Hamilton County	GTL	0.05	0.05	0.75
RI	Department of Corrections – All Locations	GTL	0.05	0.05	0.70
TN	Davidson County	GTL	0.05	0.05	0.75
NJ	Atlantic County Justice Facility	GTL	0.04	0.04	0.66
NJ	Bergen County Jail	GTL	0.04	0.04	0.66
NJ	Department of Corrections – All Locations	GTL	0.04	0.04	0.66
NJ	Juvenile Justice Commission – All Locations	GTL	0.04	0.04	0.66
OH	Franklin County	GTL	0.04	0.04	0.60
VA	Department of Corrections - All Locations	GTL	0.04	0.04	0.61
CA	CADOC – Division of Juvenile Justice	GTL	0.03	0.03	0.45
MD	Department of Corrections – All Locations	GTL	0.03	0.04	0.52
MD	Juvenile Services Department – All Locations	GTL	0.03	0.04	0.52

EXHIBIT D

Intra-State Rates for ICS Providers
(collected November 28 – December 12, 2016)

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
CA	West Care Foundation	Legacy*	20.00	1.15	37.25
CA	Atascadero State Hospital	Legacy*	15.09	1.15	32.34
TX	Flower Mound Police Department	Legacy*	13.56	1.15	30.81
TX	Justice Center PD	Legacy*	13.56	1.15	30.81
TX	Pecos Justice Center	Legacy*	13.56	1.15	30.81
TX	Rowlett Police Department	Legacy*	13.56	1.15	30.81
TX	Sommerville County Jail	Legacy*	13.56	1.15	30.81
TX	Terrell County Jail	Legacy*	13.56	1.15	30.81
PA	Wernersville State Hospital	Legacy*	13.09	0.99	27.94
CA	Bell Police Department	Legacy*	12.66	0.89	26.01
MA	Everett Police Department-TIPS	Legacy*	11.99	1.29	31.34
NJ	Lindenwold Police Department-TIPS	Legacy*	11.99	1.29	31.34
PA	Nesbitt Hospital	Legacy*	11.75	0.79	23.60
LA	Springhill Jail	Legacy*	10.43	0.25	14.18
LA	Vivian Police Department	Legacy*	10.43	0.25	14.18
LA	Welsh Police Department	Legacy*	10.43	0.25	14.18
NJ	Ocean County Juvenile Detention Center	Legacy*	9.78	1.15	27.03
NY	Lackawanna Jail	Legacy*	9.66	0.89	23.01
NY	Lancaster Police Department	Legacy*	9.66	0.89	23.01
NY	Town of Evans Police Department	Legacy*	9.66	0.89	23.01
NY	West Seneca Police Department	Legacy*	9.66	0.89	23.01
CA	Yolo County Sheriff	Legacy	9.50	1.49	31.85
CA	Clovis Police Department	Legacy*	9.50	1.49	31.85
TX	7 Points Police Department	Legacy*	4.75	1.25	23.50
TX	Addison City Jail	Legacy*	4.75	1.25	23.50
TX	Allen City Jail	Legacy*	4.75	1.25	23.50
TX	Angleton City Jail	Legacy*	4.75	1.25	23.50
TX	Aransas Pass City Jail	Legacy*	4.75	1.25	23.50
TX	Azle City Jail	Legacy*	4.75	1.25	23.50
TX	Balch Spring Police Department	Legacy*	4.75	1.25	23.50
TX	Bonham City Jail	Legacy*	4.75	1.25	23.50
TX	Brazoria Police Department	Legacy*	4.75	1.25	23.50
TX	Cedar Park City Jail	Legacy*	4.75	1.25	23.50
TX	Center Police Department	Legacy*	4.75	1.25	23.50
TX	Childress Police Department	Legacy*	4.75	1.25	23.50
TX	Cleveland City Jail	Legacy*	4.75	1.25	23.50
TX	Cockrell Hill City Jail	Legacy*	4.75	1.25	23.50

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State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
TX	Commerce Police Department	Legacy*	4.75	1.25	23.50
TX	Converse Police Department	Legacy*	4.75	1.25	23.50
TX	Crowley Police Department	Legacy*	4.75	1.25	23.50
TX	Dallas Marshall's	Legacy*	4.75	1.25	23.50
TX	Dalworthington Gardens Police Department	Legacy*	4.75	1.25	23.50
TX	Denton City Jail	Legacy*	4.75	1.25	23.50
TX	Electra City Jail	Legacy*	4.75	1.25	23.50
TX	Elsa Police Department	Legacy*	4.75	1.25	23.50
TX	Ennis City Jail	Legacy*	4.75	1.25	23.50
TX	Everman City Jail	Legacy*	4.75	1.25	23.50
TX	Farmers Branch City Jail	Legacy*	4.75	1.25	23.50
TX	Forest Hills City Jail	Legacy*	4.75	1.25	23.50
TX	Friendswood Police Department	Legacy*	4.75	1.25	23.50
TX	Frisco	Legacy*	4.75	1.25	23.50
TX	Garland Police Department	Legacy*	4.75	1.25	23.50
TX	Gladewater City Jail	Legacy*	4.75	1.25	23.50
TX	Glenn Heights City Jail	Legacy*	4.75	1.25	23.50
TX	GRAPEVINE CITY JAIL	Legacy*	4.75	1.25	23.50
TX	Greenville Police Department	Legacy*	4.75	1.25	23.50
TX	GUN BARREL CITY JAIL	Legacy*	4.75	1.25	23.50
TX	Harlingen Police Department	Legacy*	4.75	1.25	23.50
TX	Hidalgo City Jail	Legacy*	4.75	1.25	23.50
TX	Highland Park City Jail	Legacy*	4.75	1.25	23.50
TX	Highland Village City Jail	Legacy*	4.75	1.25	23.50
TX	Hillsboro City Jail	Legacy*	4.75	1.25	23.50
TX	Hutchins Police Department	Legacy*	4.75	1.25	23.50
TX	INGLESIDE CITY JAIL	Legacy*	4.75	1.25	23.50
TX	JACINTO CITY JAIL	Legacy*	4.75	1.25	23.50
TX	Jacksonville	Legacy*	4.75	1.25	23.50
TX	JCW Default	Legacy*	4.75	1.25	23.50
TX	Keene City Jail	Legacy*	4.75	1.25	23.50
TX	Kennedale Police Department	Legacy*	4.75	1.25	23.50
TX	Kilgore City Jail	Legacy*	4.75	1.25	23.50
TX	Lake Dallas City Jail	Legacy*	4.75	1.25	23.50
TX	Lake Worth Police Department	Legacy*	4.75	1.25	23.50
TX	Little Elm Police Department	Legacy*	4.75	1.25	23.50
TX	Los Fresnos City Jail	Legacy*	4.75	1.25	23.50
TX	Midland County JRTC	Legacy*	4.75	1.25	23.50
TX	Mineola City Jail	Legacy*	4.75	1.25	23.50
TX	New Boston City Jail	Legacy*	4.75	1.25	23.50

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State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
TX	Olney City Jail	Legacy*	4.75	1.25	23.50
TX	Palmview Police Department	Legacy*	4.75	1.25	23.50
TX	Pantego City Jail	Legacy*	4.75	1.25	23.50
TX	RICHARDSON CITY JAIL	Legacy*	4.75	1.25	23.50
TX	River Oaks Police Department	Legacy*	4.75	1.25	23.50
TX	Rockdale Police Department	Legacy*	4.75	1.25	23.50
TX	Saginaw Police Department	Legacy*	4.75	1.25	23.50
TX	Santa Fe City Jail	Legacy*	4.75	1.25	23.50
TX	Seagoville	Legacy*	4.75	1.25	23.50
TX	Spring Valley City Jail	Legacy*	4.75	1.25	23.50
TX	Springtown City Jail	Legacy*	4.75	1.25	23.50
TX	Taylor City Jail	Legacy*	4.75	1.25	23.50
TX	Terrell Police Department	Legacy*	4.75	1.25	23.50
TX	University Park Police Department	Legacy*	4.75	1.25	23.50
TX	Westworth Village Police Department	Legacy*	4.75	1.25	23.50
TX	Whitesboro City Jail	Legacy*	4.75	1.25	23.50
TX	Wilmer Police Department	Legacy*	4.75	1.25	23.50
TX	Wylie City Jail	Legacy*	4.75	1.25	23.50
TX	Hurst Police Department	Legacy*	4.15	0.10	5.65
TX	Armstrong County	Legacy*	4.00	0.75	15.25
TX	Cochran County	Legacy*	4.00	0.75	15.25
TX	Donely County	Legacy*	4.00	0.75	15.25
TX	Fisher County	Legacy*	4.00	0.75	15.25
TX	Jones County	Legacy*	4.00	0.75	15.25
TX	Shackelford County	Legacy*	4.00	0.75	15.25
AL	Bullock County Sheriff Office	Legacy*	3.99	0.99	18.84
CA	Ventura County Sheriff	Legacy	3.99	0.99	18.84
MD	Carroll County Detention Center -	Legacy*	3.99	0.99	18.84
NM	Eunice Police Department	Legacy*	3.99	0.99	18.84
NM	Jal Law Enforcement	Legacy*	3.99	0.99	18.84
NY	Niagara Falls Police Department	Legacy*	3.99	0.99	18.84
NY	Troy Police Department	Legacy*	3.99	0.99	18.84
NE	Thurston County Jail	Legacy*	3.95	0.69	14.30
TX	Oliver Office	Legacy*	3.75	0.40	9.75
AL	Foley Police Department	Legacy*	3.25	0.49	10.60
IL	McHenry County Jail	Legacy*	3.01	0.25	6.76
ID	Clark County Sheriff	Legacy*	3.00	0.69	13.35
MO	Chaffee Police Department	Legacy*	3.00	1.55	26.25
MO	De Soto PD	Legacy*	3.00	1.55	26.25
MO	Dixon Police Department	Legacy*	3.00	1.55	26.25

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State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
MO	Kinloch Police Department	Legacy*	3.00	1.55	26.25
MO	Webb City	Legacy*	3.00	1.55	26.25
OH	Fostoria Police Department	Legacy*	2.79	0.49	10.14
NY	Greece Town Police Department	Legacy*	2.75	0.30	7.25
CA	Metropolitan State Hospital	Legacy*	2.70	0.38	8.40
CA	Napa State Hospital	Legacy*	2.70	0.38	8.40
CA	Patton State Hospital	Legacy*	2.70	0.38	8.40
OK	Mustang City Jail	Legacy*	2.35	0.35	7.60
OK	Anadarko City Jail	Legacy*	2.35	0.95	16.60
OK	Bethany City Jail	Legacy*	2.35	0.95	16.60
OK	Bixby Police Department	Legacy*	2.35	0.95	16.60
OK	Broken Arrow City Jail	Legacy*	2.35	0.95	16.60
OK	Clinton City Jail	Legacy*	2.35	0.95	16.60
OK	El Reno City Jail	Legacy*	2.35	0.95	16.60
OK	Elk City Police Department	Legacy*	2.35	0.95	16.60
OK	Henryetta City Jail	Legacy*	2.35	0.95	16.60
OK	Locust Grove Police Department	Legacy*	2.35	0.95	16.60
OK	Manford Police Department	Legacy*	2.35	0.95	16.60
OK	Owasso Police Department	Legacy*	2.35	0.95	16.60
OK	Roland City Jail	Legacy*	2.35	0.95	16.60
OK	Seminole City Jail	Legacy*	2.35	0.95	16.60
OK	Tonawa Police Department	Legacy*	2.35	0.95	16.60
OK	Yukon City Jail	Legacy*	2.35	0.95	16.60
AL	Covington County Jail	Legacy*	2.25	0.30	6.75
NE	Scotts Bluff County Detention Center	Legacy*	2.25	0.30	6.75
MO	Independence City Jail	Legacy*	1.70	1.55	25.50
KS	Rooks County Jail	Legacy	1.55	1.55	23.25
TX	Atascosa County	Legacy*	1.50	0.75	12.75
TX	Brazos Rehab Place	Legacy*	1.50	0.75	12.75
TX	Cameron County	Legacy*	1.50	0.75	12.75
TX	Cameron County Boot Camp	Legacy*	1.50	0.75	12.75
TX	Davy Crockett Regional Juvenile Facility	Legacy*	1.50	0.75	12.75
TX	Duval County	Legacy*	1.50	0.75	12.75
TX	Granbury	Legacy*	1.50	0.75	12.75
TX	Rockdale Juvenile	Legacy*	1.50	0.75	12.75
TX	Tom Green County	Legacy*	1.50	0.75	12.75
AR	Izard County Jail	Legacy	1.25	1.25	18.75
CA	Buena Park Police Department	Legacy	1.25	1.25	18.75
CA	Corona Police Department	Legacy	1.25	1.25	18.75
CA	Costa Mesa Police Department	Legacy	1.25	1.25	18.75

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State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
CA	Glendale Police Department	Legacy	1.25	1.25	18.75
CA	Hawthorne Police Department	Legacy	1.25	1.25	18.75
CA	Hayward Police Department	Legacy	1.25	1.25	18.75
CA	Hermosa Beach Police Department	Legacy	1.25	1.25	18.75
CA	Inglewood Police Department	Legacy	1.25	1.25	18.75
CA	Manhattan Beach Police Department	Legacy	1.25	1.25	18.75
CA	Newport Beach Police Department	Legacy	1.25	1.25	18.75
CA	Signal Hill Police Department	Legacy	1.25	1.25	18.75
CA	Westminster Police Department	Legacy	1.25	1.25	18.75
MI	Berkley Police Department	Legacy	1.25	1.25	18.75
MI	Berkley Police Department	Legacy	1.25	1.25	18.75
MI	Beverly Hills Police Department MI	Legacy	1.25	1.25	18.75
MI	Birmingham Police Department	Legacy	1.25	1.25	18.75
MI	Brownstown Police Department	Legacy	1.25	1.25	18.75
MI	Canton Township Police Department	Legacy	1.25	1.25	18.75
MI	Clinton Township Police Department	Legacy	1.25	1.25	18.75
MI	Dearborn Police Department	Legacy	1.25	1.25	18.75
MI	East Lansing Police Department	Legacy	1.25	1.25	18.75
MI	Eastpointe Police Department	Legacy	1.25	1.25	18.75
MI	Ecorse Police Department	Legacy	1.25	1.25	18.75
MI	Farmington Hills Police Department	Legacy	1.25	1.25	18.75
MI	Fenton Police Department	Legacy	1.25	1.25	18.75
MI	Ferndale Police Department	Legacy	1.25	1.25	18.75
MI	Garden City Police Department	Legacy	1.25	1.25	18.75
MI	Grosse Pointe Woods	Legacy	1.25	1.25	18.75
MI	Harper Woods Police Department	Legacy	1.25	1.25	18.75
MI	Hazel Park Police Department	Legacy	1.25	1.25	18.75
MI	Inkster Police Department	Legacy	1.25	1.25	18.75
MI	Lincoln Park Police Department	Legacy	1.25	1.25	18.75
MI	Livonia Police Department	Legacy	1.25	1.25	18.75
MI	Madison Heights Police Department	Legacy	1.25	1.25	18.75
MI	Milford Police Department	Legacy	1.25	1.25	18.75
MI	Northville Police Department	Legacy	1.25	1.25	18.75
MI	Novi Police Department	Legacy	1.25	1.25	18.75
MI	Plymouth Township Police Department	Legacy	1.25	1.25	18.75
MI	Redford Police Department	Legacy	1.25	1.25	18.75
MI	Rochester Police Department	Legacy	1.25	1.25	18.75
MI	Romulus Police Department	Legacy	1.25	1.25	18.75
MI	Royal Oak Police Department	Legacy	1.25	1.25	18.75
MI	Southfield Police Department	Legacy	1.25	1.25	18.75

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State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
MI	Southgate Police Department	Legacy	1.25	1.25	18.75
MI	St. Clair Shores Police Department	Legacy	1.25	1.25	18.75
MI	Sterling Heights Police Department	Legacy	1.25	1.25	18.75
MI	Taylor Police Department	Legacy	1.25	1.25	18.75
MI	Trenton Police Department	Legacy	1.25	1.25	18.75
MI	Troy Police Department	Legacy	1.25	1.25	18.75
MI	Utica Police Department	Legacy	1.25	1.25	18.75
MI	Van Buren Township Police Department	Legacy	1.25	1.25	18.75
MI	Warren Police Department	Legacy	1.25	1.25	18.75
MI	West Bloomfield Police Department	Legacy	1.25	1.25	18.75
MI	Westland Police Department	Legacy	1.25	1.25	18.75
MI	White Lake Police Department	Legacy	1.25	1.25	18.75
MI	Wixom Police Department	Legacy	1.25	1.25	18.75
MI	Wyandotte Police Department	Legacy	1.25	1.25	18.75
TX	Bedford Police Department	Legacy	1.25	1.25	18.75
TX	West Columbia Police Department	Legacy	1.25	1.25	18.75
FL	Department of Corrections – Pay Telephones	Legacy*	1.20	0.06	2.10
CA	Alhambra Police Department	Legacy	1.15	1.15	17.25
CA	Beverly Hills Police Department	Legacy	1.15	1.15	17.25
CA	Burbank Police Department	Legacy	1.15	1.15	17.25
CA	Chula Vista City Jail	Legacy	1.15	1.15	17.25
CA	Fremont Police Department	Legacy	1.15	1.15	17.25
CA	Monterey Park Police Department	Legacy	1.15	1.15	17.25
CA	Pasadena Police Department	Legacy	1.15	1.15	17.25
ID	Clearwater County Sheriff	Legacy	1.15	1.15	17.25
ID	Lewis County Sheriff	Legacy	1.15	1.15	17.25
TX	Lewisville	Legacy	1.15	1.15	17.25
CA	El Segundo Police Department	Legacy	1.10	1.10	16.50
CA	Gardena Police Department	Legacy	1.10	1.10	16.50
MI	Allen Park Police Department	Legacy	1.05	1.05	15.75
OR	Benton County Jail	Legacy	1.05	1.05	15.75
OR	Josephine County Jail	Legacy	1.05	1.05	15.75
WI	Dunn County Jail	Legacy	1.05	1.05	15.75
WI	Jackson County Jail	Legacy	1.05	1.05	15.75
CA	Redondo Beach Police Department	Legacy	0.95	0.95	14.25
NE	Pierce County Sheriff	Legacy	0.95	0.95	14.25
OH	Cuyahoga Falls Police Department	Legacy	0.95	0.95	14.25
OH	Middletown Police Department	Legacy	0.95	0.95	14.25
OK	Edmond Police Department	Legacy	0.95	0.95	14.25
WA	Adams County Sheriff	Legacy	0.95	0.95	14.25

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State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
CA	Lodi Police Department	Legacy	0.90	0.90	13.50
TX	Blue Mound Police Department	Legacy	0.90	0.90	13.50
CA	Whittier Police Department	Legacy	0.85	0.85	12.75
MO	Douglas County Sheriff	Legacy	0.85	0.85	12.75
OK	Lawton City Police Department	Legacy	0.85	0.85	12.75
MO	Blue Springs Police Department	Legacy*	0.81	0.50	12.15
AZ	White Mountain Apache Corrections Center	Legacy	0.75	0.75	11.25
CA	Bell Gardens Police Department	Legacy	0.75	0.75	11.25
CA	Montebello Police Department	Legacy	0.75	0.75	11.25
MO	Montgomery County Jail	Legacy	0.75	0.75	11.25
ND	Gerald Fox Adult Detention Center	Legacy	0.75	0.75	11.25
TX	The Colony Police Department	Legacy	0.75	0.75	11.25
TX	Walker County Jail	Legacy	0.75	0.75	11.25
CA	Colusa County Jail	Legacy	0.73	0.73	10.95
NY	Central New York Psychiatric Center	Legacy	0.69	0.69	10.35
AZ	Hualapai Adult Detention Center	Legacy	0.65	0.65	9.75
CA	Long Beach Police Department	Legacy	0.65	0.65	9.75
OH	Shelby Police Department	Legacy	0.65	0.65	9.75
SD	Rosebud Sioux Tribe Adult Corrections	Legacy	0.65	0.65	9.75
MO	Louisiana Police Department	Legacy	0.60	0.60	9.00
OK	Okmulgee County Jail	Legacy	0.60	0.60	9.00
OK	Yukon Police Department	Legacy	0.60	0.60	9.00
IL	Winnebago County Jail	Legacy	0.55	0.55	8.25
IL	Winnebago County Juvenile DC	Legacy	0.55	0.55	8.25
MO	Scott City Police Department	Legacy	0.55	0.55	8.25
MS	Natchez Police Department	Legacy	0.55	0.55	8.25
NC	Moore County Detention Center	Legacy	0.55	0.55	8.25
SC	McCormick County Sheriff	Legacy	0.55	0.55	8.25
SC	Newberry County Detention Center	Legacy	0.55	0.55	8.25
NM	Socorro County Detention Center	Legacy*	0.50	0.10	2.00
CO	Grand County Jail	Legacy	0.50	0.50	7.50
NE	Lancaster Youth Services Center	Legacy	0.50	0.50	7.50
NJ	Paterson Police Department	Legacy	0.50	0.50	7.50
AZ	Colorado River Indian Tribes Detention	Legacy*	0.50	0.75	11.75
ID	Adams County Sheriff	Legacy	0.47	0.47	7.05
CA	Mendocino County – All Locations	Legacy	0.45	0.45	6.75
IN	Hammond Police Department	Legacy	0.45	0.45	6.75
WA	Hoquiam Police Department	Legacy	0.45	0.45	6.75
WA	Lynnwood Jail	Legacy	0.45	0.45	6.75
WA	Whatcom County Jail/ Interim Work Center	Legacy	0.42	0.42	6.30

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State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
WA	Whatcom County Juvenile Hall	Legacy	0.42	0.42	6.30
AZ	Yuma County Detention Center	Legacy	0.40	0.40	6.00
CA	Huntington Beach Police Department	Legacy	0.35	0.35	5.25
OR	Jackson County Main Jail	Legacy	0.35	0.35	5.25
OR	Jackson County Transition Center	Legacy	0.35	0.35	5.25
VA	Accomack County Sheriff	Legacy	0.35	0.35	5.25
MI	Charlevoix County	Legacy	0.35	0.50	7.85
MI	Crawford County Jail	Legacy	0.35	0.50	7.85
MI	Huron County Jail	Legacy	0.35	0.50	7.85
MI	Kalkaska County Jail	Legacy	0.35	0.50	7.85
MI	Leelanau County Jail	Legacy	0.35	0.50	7.85
MI	Manistee County Jail	Legacy	0.35	0.50	7.85
AL	Arab City Police Department	Legacy	0.30	0.30	4.50
AL	Geneva County Jail	Legacy	0.30	0.30	4.50
AL	Guntersville City Police Department	Legacy	0.30	0.30	4.50
AL	Montgomery County Detention Center	Legacy	0.30	0.30	4.50
AL	Adamsville Police Department	Legacy	0.28	0.28	4.20
AL	Albertville City Police Department	Legacy	0.28	0.28	4.20
AL	Daphne City Police Department	Legacy	0.28	0.28	4.20
AL	Dothan Police Department	Legacy	0.28	0.28	4.20
AL	Houston County Jail	Legacy	0.28	0.28	4.20
AL	Orange Beach Police Department	Legacy	0.28	0.28	4.20
LA	Acadia Parish Detention Center	Legacy	0.25	0.25	3.75
LA	Acadia Parish Jail	Legacy	0.25	0.25	3.75
LA	Baker City Police Department	Legacy	0.25	0.25	3.75
LA	Beauregard Parish Jail	Legacy	0.25	0.25	3.75
LA	Christian Acres Juvenile Youth Center	Legacy	0.25	0.25	3.75
LA	Eunice City Jail	Legacy	0.25	0.25	3.75
LA	Leesville City Jail	Legacy	0.25	0.25	3.75
LA	Morgan City Jail	Legacy	0.25	0.25	3.75
LA	Opelousas City Jail	Legacy	0.25	0.25	3.75
LA	Sulphur Police Department	Legacy	0.25	0.25	3.75
LA	Vermilion Parish Sheriff	Legacy	0.25	0.25	3.75
LA	Ville Platte Police Department	Legacy	0.25	0.25	3.75
LA	West Feliciana Parish Jail	Legacy	0.25	0.25	3.75
MI	Farmington Police Department	Legacy	0.25	0.25	3.75
SC	Darlington County Prison Farm	Legacy	0.25	0.25	3.75
CA	Tuolumne County Jail	Legacy	0.22	0.22	3.30
CA	Fresno County Jail	Legacy	0.20	0.20	3.00
MA	Boston – All Districts	Legacy	0.20	0.20	3.00

* Rate Calculator lists "Connection Charge" in addition to per minute rate. 15 Min. Rate = Connection Rate + (15 * Add. Min. Rate).

Telpmate does not make its rates available to the public without having to call for each facility – "DNMA."

State	Facility	ICS Provider	1st Min. Charge (\$)	Add. Min Charge (\$)	15 Min. Rate (\$)
GA	Coffee County Jail	Legacy	0.19	0.19	2.85
GA	Decatur County Correctional Prison	Legacy	0.19	0.19	2.85
GA	Decatur County Jail	Legacy	0.19	0.19	2.85
MS	Itawamba County Jail	Legacy	0.19	0.19	2.85
MS	Marshall County Sheriff Department	Legacy	0.19	0.19	2.85
MS	Tishomingo County Sheriff Department	Legacy	0.19	0.19	2.85
GA	Acworth	Legacy	0.18	0.18	2.70
NM	Dona Ana County Detention Center	Legacy	0.15	0.15	2.25
NM	Pueblo of Laguna Detention Facility	Legacy	0.15	0.15	2.25
NM	Ramah Navajo Police Department	Legacy	0.15	0.15	2.25
NM	Zuni Department of Corrections	Legacy	0.15	0.15	2.25

* Rate Calculator lists "Connection Charge" in addition to per minute rate. 15 Min. Rate = Connection Rate + (15 * Add. Min. Rate).

Telmate does not make its rates available to the public without having to call for each facility – "DNMA."

EXHIBIT E

Petro, Lee G.

From: Rafael Quinto <rquinto@legacyinmate.com>
Sent: Friday, July 29, 2016 3:18 PM
To: Petro, Lee G.
Subject: RE: Legacy Long Distance International, Inc.

Mr. Petro,

We do not have a stamped copy to provide, due to the fact that we honestly did not file the data. The data was compiled, but was never submitted on or before the August 18, 2014 deadline as instructed. At the time we were working with three different tariff attorneys and unfortunately the filing was overlooked by all parties. The data that I provided you is the data that would have been submitted for filing.

Thank you,

Rafael Quinto

Operations
Legacy Long Distance Int'l, Inc.
Legacy Inmate Communications
10833 Valley View Street
Suite 150
Cypress, CA 90630
800-577-5534 ext. 208
rquinto@legacyinmate.com

From: Petro, Lee G. [<mailto:Lee.Petro@dbr.com>]
Sent: Friday, July 29, 2016 10:59 AM
To: Rafael Quinto
Subject: RE: Legacy Long Distance International, Inc.

Thank you. Do you have an FCC-stamped copy of this submission?

There is no record of it being filed at the FCC nor has there been any mention of Legacy in any FCC decision, suggesting that they did not receive this submission by August 18, 2014.

Absent a stamped copy of this submission, please provide some evidence that it was submitted on or before August 18, 2014.

Thank you.

Lee G. Petro
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1500 K Street, N.W.
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EXHIBIT F

comprehensive rules to reform practices and charges by ICS providers, which have led to almost two decades of unjust, unreasonable and unfair ICS rates and ancillary fees.

As discussed herein, the FCC must review the responses to the issues raised in the *3rd FNPRM*, and adopt rules that will close the loop on the egregious practices of ICS providers and their vendors. In particular, the Petitioners urge the FCC to (i) take steps to encourage a competitive ICS marketplace; (ii) adopt rules and rate caps relating to video visitation and other bundled services; (iii) require annual mandatory data collection submissions, including both cost and revenue information; (iv) establish a docket that will receive all ICS contracts; (v) extend the adopted rate and ancillary fee caps to International calling; and (vi) prohibit the pass-through of all financial transaction fees – both by affiliates of ICS providers and third-parties.

DISCUSSION

I. COMPETITION IN THE ICS INDUSTRY.

In the *3rd FNPRM*, the FCC renews its call for comments on different approaches to introduce competition into the ICS market. Noting the overwhelming evidence in the record that the ICS industry is a marketplace failure, the FCC seeks proposals “to promote competition within the ICS market to enable the FCC to sunset or eliminate our regulations adopted herein in the future.”³ The FCC correctly notes that the Petitioners have been calling for the introduction of competition in the ICS market for more than 15 years, and in fact, this goal served as the basis for Martha Wright and the Petitioners to file the original lawsuit.⁴

As noted in the *3rd FNPRM*, both the ICS providers and the correctional authorities have rejected any effort to introduce competitive ICS service at a particular facility. While there

³ *3rd FNPRM*, 30 FCC Rcd at 12,900.

⁴ *Id.* (citing *Petition for Rulemaking Or, In the Alternative, Petition To Address Referral issues In Pending Rulemaking*, pg. 2, filed Oct. 31, 2003).

may be different vendors providing different services,⁵ the Petitioners are not aware of any instance in the US where there is more than one ICS provider that is authorized to provide competing ICS services at a particular correctional facility.

Instead, the pace of consolidation within the prison-industrial complex has accelerated in recent years, resulting in attempts by ICS providers to serve all aspects of the correctional authorities' needs at the facility. For example, in 2015, Securus Technologies acquired JPay Inc., of the largest commissary companies serving prisons and jails.⁶ Another large conglomerate – Keefe Group – owns an ICS provider – ICSolutions – which provides telephone and video visitation services, and also owns the largest commissary service company – Keefe Commissary Network – along with Access Corrections – which provides payment, email, photo and other entertainment services.⁷

In addition, GTL provides a menu of services, including ICS telephone, investigative services, facility management solutions, in-person and video visitation management, payment and deposit solutions and educational content solutions.⁸ Telmate also offers a laundry list of services – dubbed, the Telmate Ecosystem – which includes telephone, video visitation,

⁵ *3rd FNPRM*, 30 FCC Rcd at 12,901, nt. 1016 (*citing* GTL's Second FNPRM Comments). Petitioners note that GTL's comments do not state there is more than one ICS provider at a particular facility, but rather, that multiple companies provide distinct services at that facility.

⁶ *See Securus Technologies, Inc. Completes Transaction to Acquire JPay Inc.*, Press Release (July 31, 2015) (<http://tinyurl.com/h3cf8s2>) (merger will “provide the ultimate platform for digitized payments, communications, entertainment and education in the correctional space.”).

⁷ *See Keefe Group – Companies*, www.keefegroup.com/companies-101 (“Today, Keefe is comprised of six operating companies, each focused on distinct aspects of commissary operations: Keefe Supply Company, Keefe Commissary Network, Access Securepak, Access Corrections, ICSolutions and Advanced Technologies Group.”)

⁸ *See GTL – Services*, <http://www.gtl.net/correctional-facility-services/> (“We are committed to pushing the envelope on how technology can help improve virtually every aspect of your operations, including the day-to-day experiences of everyone in the corrections ecosystem: staff, inmates, family and friends. From the hardened exteriors of our kiosks, phones and other in-pod devices to the reliability and security of the software that powers our solutions, everything we provide is designed from the ground up with the rigors of the corrections environment in mind.”). *See also GTL Second FNPRM Comments*, filed Jan. 12, 2015, pgs. 40-44 (discussing GTL Genesis service).

voicemail, email, messaging, photo sharing and education services.⁹ Even ICS providers that primarily focus on jails, such as Pay Tel Communications¹⁰ and NCIC,¹¹ offer correctional authorities a suite of services beyond just ICS telephone calls.

Thus, the trend in the prison-industrial complex is for each company to promote itself as a one-stop shop for a correctional facility. As discussed below, recent bid proposals submitted to correctional facilities offer a bundle of services, and the companies compete to make the best offer to win the contract with the correctional facility. Importantly, these bundled contracts include the sharing of revenue earned on both ICS and non-communication services, which is one of the main reasons that the Petitioners advocated for the FCC to avoid involving itself with regulating site commissions. As we noted, the FCC would not be able to get a firm handle on the many ways that these companies could share their revenue with the correctional facilities as these services expanded to cover additional services, and the FCC's determination to not ban site commissions was appropriate.

In light of these trends, and in order for the FCC to meet its goal in promoting competition in the ICS market, the FCC must focus on developing rules to re-structure the ICS market so that it delivers just, reasonable and fair rates and ancillary fees for consumers.

Previously, the Petitioners filed comments urging the FCC to adopt ICS access rules similar to the Inside Wiring and Exclusive Contract rules for multi-dwelling units.¹² In those proceedings, the FCC prohibited anti-competitive practices that prevented new entrants "from

⁹ See *Telmate Ecosystem* – <http://www.telmate.com/the-telmate-ecosystem/>.

¹⁰ See *Pay Tel Communications – Products and Services*, <https://www.paytel.com/interested-facilities/products-and-services/> (offering jail management, visitation, kiosk, messaging and ICS telephone services).

¹¹ See *NCIC* - <https://www.ncic.com/ice.htm> (offering voicemail, commissary, jail management services).

¹² *Petitioners FNPRM Comments*, filed Dec. 10, 2013, pg. 17. See also *Exclusive Service Contracts For Provision of Video Services in Multiple Dwelling Units and Other Real Estate Developments*, 22 FCC Rcd 20,235 (2007), *aff'd sub nom. Nat'l Cable & Television Ass'n v. FCC*, 567 F.3d 659 (2009). See also *Telecommunications Services Inside Wiring: Customer Premises Equipment*, 22 FCC Rcd 10,640, 10,641 (2007).

competing for consumers in multi-unit buildings based on regulatory technicalities or costly and inefficient industry practices.”¹³ The Petitioners noted that correctional authorities differentiate ICS providers almost exclusively on which company will promise to pay the highest site commission, so it must be correct that the service offerings by the ICS providers are largely uniform.

As such, the Petitioners suggested that the FCC adopt rules to prohibit exclusive contracts and other practices that prevent competition at a correctional facility. Correctional authorities could create a list of required security measures that all ICS providers seeking to provide service must agree to provide, and then permit ICS customers to select a provider of their choice. While there would be additional steps in setting up this structure, the competition among ICS providers for customers would lead to lower ICS rates and fees.

In response, correctional authorities and ICS providers uniformly rejected the idea of multiple ICS providers at a particular facility, with the ICS providers indicating that they would likely not bid to serve under a competitive regime, and correctional authorities stating that they “would likely eliminate ICS rather than allowing multiple ICS vendors.”¹⁴ On the other hand, HRDC correctly notes that, until there is competition among ICS providers at a particular correctional facility, “the discussion will continue to revolve around ways to gouge consumers and extract money from them – not on how to deliver the best, most cost-efficient ICS services to prisoners and their families.”¹⁵

One way to reach this goal is to establish rules under which a correctional authority’s service provider does not offer service directly to ICS customers. Instead, the FCC would create two separate classes of ICS — wholesale and retail. Wholesale providers would respond to a correctional authority’s request for proposal, and the successful wholesale provider would be

¹³ 22 FCC Rcd at 10,641 (2007).

¹⁴ 3rd FNPRM, 30 FCC Rcd at 12,901.

¹⁵ *Id.*, nt. 1015 (citing HRDC July 29, 2015 Ex Parte Letter, at pg. 8).

responsible for installing equipment at the facility, but it would not be authorized to provide retail service at the facility, either directly or through subsidiaries. The wholesale ICS provider would provide a standardized level of service satisfying the facility's requested security biometrics and call monitoring capability. As a result, the correctional authorities would maintain their existing level of security for ICS.

Furthermore, the wholesale provider (or correctional facility) would be responsible for installing and maintaining payment kiosks, video visitation/video phone equipment (collectively, "video visitation"), and inmate ICS end user services/equipment, but retail ICS providers would be guaranteed equal access to all such equipment without barriers to provide retail ICS to their customers. The wholesale ICS provider would establish a demarcation point or permit colocation at the facility.

Under this structure, correctional authorities would contract with one wholesale ICS provider, and ICS customers would be permitted to choose among retail ICS providers for the lowest rates and fees. After establishing a rate structure for the wholesale ICS providers to charge retail ICS companies, the FCC would then avoid involving itself in the state and local bidding processes. Moreover, the FCC would have created the direct relationship between ICS providers and their customers, and would permit consumers to choose an ICS retail provider that best meets their needs.

This proposal tracks the steps taken by the FCC to promote facilities-based retail competition in the wireline local telephone market. The FCC could create competition in the ICS industry by mandating equal access to ICS site-based services at wholesale rates, with ICS customers finally getting the opportunity to choose their service provider and reap the associated economic advantages arising from competition in the marketplace.

The Petitioners acknowledge that this proposal suggests a significant overhaul to the ICS rules and the prison-industrial complex, and we urge the FCC to fully implement the rate and

ancillary fee caps adopted in the *Second R&O* while it studies this proposal in more detail.¹⁶ However, the FCC was directed by Congress to “promote competition and the widespread deployment of payphone services,”¹⁷ and correctional authorities steadfastly argue that dealing with separate ICS providers is too costly. Maintaining a structure whereby correctional authorities deal only with one entity would eliminate this concern, and creating a competitive marketplace for ICS customers would serve the public interest.

The alternative, of course, is that ICS providers and correctional authorities acknowledge (i) that the current ICS structure does not promote competition, (ii) that their practices have led to unjust, unreasonable and unfair rates being charged to ICS customers, and (iii) that the appropriate and legally sustainable solution is to accept the FCC’s authority to cap ICS rates and ancillary fees as set forth in the *Second R&O*.

Stated another way, if the prison-industrial complex seeks to maintain its current structure – with each company offering to provide a complete suite of services on the condition that it is the sole provider at particular correctional facility – it must, at the very least, acknowledge that their practices do not ensure just, reasonable and fair ICS rates and fees, and accept the FCC’s steps taken in the *Second R&O* to protect ICS consumers.

II. THE FCC MUST ENSURE THAT ICS PROVIDERS DO NOT GOUGE VIDEO VISITATION CONSUMERS.

As noted above, companies providing ICS telephone service are increasingly bundling additional services to provide to correctional facilities and inmates. GTL, Securus, ICSolutions, Telmate, Pay Tel Communications and NCIC all offer a suite of services, including video visitation. The *3rd FNPRM* seeks additional information regarding video visitation, including whether the FCC should adopt caps on rates and ancillary fees charged for video visitation

¹⁶ *Id.*, at 12,902 (“should the Commission, as suggested, first adopt rate and ancillary service charge reform and then determine if additional steps are necessary and perhaps revisit the idea of intra-facility competition then.”).

¹⁷ *Id.* at 12,901 (citing 47 U.S.C. § 276).

EXHIBIT G

As discussed below, the Wright Petitioners urge the FCC to: (i) adopt rules that will introduce competition into the ICS marketplace; (ii) establish rate and fee caps for international ICS, ICS video visitation, and other advanced ICS communication services, (iii) require the submission of ICS providers' cost and revenue information for at least five years, starting with 2015 data, (iv) mandate the submission of ICS contracts within 30 days of execution; and (v) close remaining loopholes regarding third-party fees which serve only to inflate fees paid by ICS consumers.

DISCUSSION

I. COMPETITION IN THE ICS INDUSTRY.

In our Comments to the *3rd FNPRM*, the Wright Petitioners urged the FCC to adopt rules to introduce competition into the ICS marketplace. We noted that the prison-industrial complex has become consolidated, with a limited number of companies offering a “suite” of inmate-related services, including commissary services, email, video visitation, video phone, and telephone services.³ Other commenters also discussed this consolidation.⁴

In light of the accelerating movement among ICS providers to become a “one-stop” shopping alternatives for correctional facilities, we suggested that the FCC create two classes of ICS, wholesale and retail. We noted that this structure would insulate ICS consumers from the ICS provider that has contracted with the correctional authority (and perhaps has chosen to share its revenue through a site commission), and permit retail

³ *Wright Petitioners Comments*, pg. 4 (Jan. 19, 2016) (“*3rd FNPRM Comments*”).

⁴ *See Prison Policy Initiative Comments*, Loophole On The Horizon: The Regulatory Harms Of Phone Companies Bundling Telecommunications Services With Prison Financial Services In One Contract, pg. 2 (Jan. 19, 2016). *See Human Rights Defense Center Comments*, pg. 4 (Jan. 19, 2016).

ICS providers to purchase access to that facility from the wholesale ICS provider. The consumer would then choose among the various retail ICS providers to determine the lowest rate.⁵ Competition among the retail ICS providers would satisfy the goal expressed in Section 276(b) of the Communications Act, as amended, to “promote competition among [inmate telephone service] providers and promote the widespread deployment of payphone services *to the benefit of the general public.*”⁶

We concluded that if the correctional authorities and ICS providers are opposed to introducing competition into the ICS marketplace, then they must “acknowledge (i) that the current ICS structure does not promote competition, (ii) that their practices have led to unjust, unreasonable and unfair rates being charged to ICS customers, and (iii) that the appropriate and legally sustainable solution is to accept the FCC’s authority to cap ICS rates and ancillary fees as set forth in the *Second R&O.*”⁷

Only one correctional organization filed comments in response to the *3rd FNPRM*. The California State Sheriffs’ Association urged the FCC “to refrain” from banning exclusive ICS contracts, citing “security concerns, impose logistical burdens, increase costs of providing ICS..., and perhaps diminish the quality of ICS that are provided.”⁸

The ICS providers were equally unsupportive. CenturyLink claimed that banning exclusive contracts would lead to higher costs and that the FCC lacks the statutory authority to do so.⁹ GTL made similar arguments, stating that there are “unique security

⁵ *3rd FNPRM Comments*, pg. 6.

⁶ 47 U.S.C. § 276(b)(1) (2016) (emphasis added).

⁷ *3rd FNPRM Comments*, pg. 7.

⁸ *California State Sheriffs’ Association Comments*, pg. 1 (Jan. 19, 2016).

⁹ *CenturyLink Comments*, pgs. 3-4 (Jan. 19, 2016).

needs” and that providing the ability of ICS consumers to choose among competing ICS providers would lead to higher ICS rates, or the elimination of ICS altogether.¹⁰ Securus argued that competition already exists in the ICS marketplace, and extensively cited the previously-provided December 8, 2014 Declarations from Geoff Boyd and Dave Kunde to argue against introducing multiple providers.¹¹ Finally, Pay Tel Communications expressed its opinion that banning site commissions and introducing a cost-recovery fee would have introduced competition, but “having multiple providers provide ICS in the same facility is unworkable.”¹²

Thus, it is clear that ICS providers and correctional authorities are strongly against the introduction of competition into the ICS marketplace. Similar opinions were expressed by these parties in earlier phases of this proceeding, and it would appear that nothing has changed.¹³ While Securus argued that “robust competition” already exists,¹⁴ it is clear from the record that ICS providers only compete to earn the right to be the monopoly provider at a particular correctional facility, and that ICS consumers do not benefit from this competition.¹⁵ Instead, ICS consumers never get to choose among ICS providers, and no ICS provider or correctional authority supports a change in this approach.

¹⁰ *GTL Comments*, pgs. 9-11 (Jan. 19, 2016).

¹¹ *Securus Comments*, pgs. 1-6 (Jan. 19, 2016).

¹² *Pay Tel Communications, Inc., Comments*, pgs. 4-5 (Jan. 19, 2016). Telmate, LLC, did not address this points in its comments.

¹³ *Third FNPRM*, 30 FCC Rcd at 12,900-12,901

¹⁴ *Securus Comments*, pg. 1.

¹⁵ *Second R&O*, 30 FCC Rcd at 12,765 (“[t]here is little dispute that the ICS market is a prime example of a market failure.”)(citing *First R&O*, 28 FCC Rcd 14,107, 14,129-30, para. 41). *See also Dissenting Statement of Michael O’Reilly*, *Second R&O*, 30 FCC Rcd at 12,972 (“there is no dispute that the prison payphone market as a whole does not seem to be functioning properly.”)(“*O’Reilly Dissent*”).

Therefore, in light of this marketplace failure, and the unwillingness of ICS providers and correctional authorities to support multiple ICS providers serving a correctional facility, the FCC had only one other choice to protect ICS consumers – adopt caps on ICS rates and ancillary fees charged to ICS consumers. While the *Second R&O* took this approach, Securus, GTL, CenturyLink and Telmate have filed petitions for review and motions for stay in the U.S. Court of Appeals for the D.C. Circuit, challenging the FCC’s exercise of its statutory authority to set caps on ICS rates and ancillary fees.¹⁶

It would seem that no approach taken by the FCC to regulate ICS interstate and intrastate rates and ancillary fees would be acceptable to the ICS providers unless the FCC also relieves ICS providers from their existing, voluntary obligation to pay site commissions. Apparently, Securus, GTL and Telmate would have accepted caps on the ICS rates and ancillary fees if the FCC shifted the burden of site commissions onto ICS consumers through a cost-recovery fee.¹⁷ GTL, Securus and Telmate even advocated, on

¹⁶ See *Global Tel*Link, et al.*, No. 15-1461 and consolidated cases. Pay Tel has taken a different tack by setting up a website – www.mandatorycostrecovery.com – which urges correctional authorities to contact their congressional representatives to “ensure that phone access is preserved for inmates by mandating a specific per minute cost recovery rate additive for facilities.” It also contains an analysis from Don J. Wood which incorrectly asserts that “If rate caps are properly set at the level of efficiently-incurred costs (and site commissions are explicitly excluded from this definition of costs), there will be no money available for ICS providers to pay commissions.” See *An Analysis of the Treatment of Site Commissions in the FCC’s Second Report and Order in the Inmate Calling Services Proceeding*, attached hereto as Exhibit A. Mr. Wood presents similar reasoning to that which was presented in a document submitted by the Wright Petitioners on February 3, 2016. See <http://apps.fcc.gov/ecfs/document/view?id=60001422245>. While the Wright Petitioners do not assert that Pay Tel is the author of the previously-submitted document, the justification presented in that document is nearly identical to that contained in Mr. Wood’s analysis (compare Wood’s statement with Section II of the submitted document - “*In setting the rate caps, the FCC excluded the cost of site commissions and set rates below provider’s costs to force them to stop paying site commissions.*”).

¹⁷ *Ex Parte Submission of GTL, Securus and Telmate* (Sept. 14, 2014). See also *Ex Parte Submission of GTL, Pay Tel, Securus and Telmate* (Oct. 15, 2015) (urging summit to address proposal by Securus counsel, Andrew D. Lipman). See also *Ex Parte Submission of GTL, Securus and Telmate* (Oct. 15, 2015) (the FCC has authority to regulate interstate and intrastate ICS site commissions).

the eve of the adoption of the *Second R&O*, that “[p]romoting competition in the market for payphone services requires attention to the rates charged for every call, not just interstate ones” and that Section 276 granted to “the FCC the authority to regulate intrastate matters.”¹⁸

It is, therefore, astounding that the very same parties who advocated that the FCC has authority to regulate both interstate and intrastate ICS rates when they were trying to have the FCC step in and relieve them of their onerous but entirely voluntary business decision to pay site commissions, have since filed petitions for stay with the FCC,¹⁹ and petition for review and motions for stay with the US Court of Appeals, challenging the FCC’s authority under Section 276 to cap intrastate ICS rates.²⁰

In the end, only one conclusion can be reached from reviewing their flip-flops in advocacy and their refusal to compete against each other for ICS consumers – namely, that the ICS providers would prefer to simply maintain the status quo. However, the FCC does not have that luxury, as it is obligated to correct market failures to ensure that ICS rates and fees are just, reasonable and fair.²¹

¹⁸ See *Ex Parte Submission of GTL, Securus and Telmate*, pg. 6 (citing *New England Public Communications Council*, 334 F.3d 69, 76-77 (recognizing that, “in passing the 1996 Act’s payphone competition provision and the local competition provisions, Congress had exactly the same objective: to authorize the Commission to eliminate barriers to competition,” and noting that it would be similarly impossible to implement the Section 276 competition provisions “while limiting the Commission’s authority to interstate services”)).

¹⁹ See *Rates for Interstate Inmate Calling Services*, Order, DA 16-83 (Jan. 22, 2016)(dismissing petitions for stay filed by GTL, Securus and Telmate). See also *CenturyLink’s Petition for Stay Pending Judicial Review*, WC Dkt. 12-375 (Jan. 29, 2016).

²⁰ See, e.g., *Motion for Global Tel*Link for Partial Stay Pending Judicial Review*, No. 15-1461, pg. 3 (Jan. 27, 2016) (“Even more fundamentally, the Order is unlawful because the FCC lacks authority to set rate caps for intrastate ICS calls.”).

²¹ 47 U.S.C. § 201(b) (“any such charge, practice, classification, or regulation that is unjust or unreasonable is declared to be unlawful.”) (emphasis added); See 47 U.S.C. § 205(a) (“the Commission is authorized and empowered to determine and prescribe what will be the just and

II. THE FCC MUST ENSURE VIDEO VISITATION AND ADVANCED ICS COMMUNICATIONS SERVICES ARE NOT USED TO AVOID FCC REGULATION OF ICS INDUSTRY.

As noted in our 3rd FNRPM comments, the FCC has requested a substantial amount of information that can only come from ICS providers and correctional facilities. We even provided a helpful chart – Exhibit A – which detailed the information requested by the FCC so that ICS providers and correctional authorities could respond to the FCC’s request.²² The Wright Petitioners did make an attempt to obtain the video visitation rate information requested by the FCC, and provided what could be found as Exhibit B. The information provided therein showed a great range of rates charged by ICS providers.²³

The Wright Petitioners also provided a discussion of the FCC’s authority to regulate video visitation and other new services offered by ICS providers, concluding that the FCC has ample authority to prescribe just, reasonable and fair rates for ICS video visitation and advanced ICS communications services.²⁴ Other parties, such as the Prison Policy Initiative, HRDC, Verizon, and the Electronic Frontier Foundation, also support the FCC

reasonable charge or the maximum or minimum, or maximum and minimum, charge or charges to be thereafter observed, and what classification, regulation, or practice is or will be just, fair, and reasonable.”) (emphasis added); See 47 U.S.C. §276(b)(1) (“In order to promote competition among [ICS] providers and promote the widespread deployment of payphone services to the benefit of the general public...the Commission shall take all actions necessary...to establish a per call compensation plan to ensure that all [ICS] providers are fairly compensated.”) (emphasis added). Rather than just being an optional “a la-carte” order (See *O’Rielly Dissent*, pg. 1), these obligations were imposed upon the FCC by Congress in the Communications Act of 1934, as amended.

²² 3rd FNRPM Comments, pg. 9, Exhibit A.

²³ *Id.*, pg. 10.

²⁴ *Id.*, pgs. 13-14.

EXHIBIT H

The author(s) shown below used Federal funds provided by the U.S. Department of Justice and prepared the following final report:

Document Title: Analysis of Managed Access Technology in an Urban Deployment: Baltimore City Jail Complex

Author(s): Fred Frantz, Phil Harris

Document No.: 250263

Date Received: September 2016

Award Number: 2010-IJ-CX-K023

This report has not been published by the U.S. Department of Justice. To provide better customer service, NCJRS has made this federally funded grant report available electronically.

Opinions or points of view expressed are those of the author(s) and do not necessarily reflect the official position or policies of the U.S. Department of Justice.

**Analysis of Managed Access Technology in an Urban Deployment:
Baltimore City Jail Complex**

Fred Frantz
Engility Corporation

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Executive Summary

Managed access, as a category of technology, has become an increasingly significant tool for denying illegal inmate use of cellular telephone services. This report is the second of a set of reports examining the impact of managed access technology on contraband cell phone use in prisons. The focus of this report is the use of Distributed Antenna System (DAS) Technology, deployed in support of cellular Managed Access System (MAS) use in an urban correctional facility—the Maryland Department of Public Safety and Correctional Services (DSPCS) Baltimore City Complex. This report builds upon technical information in a previous assessment of MAS which described operation of managed access technology deployed in a rural correctional facility. The technical background material is presented in a conceptual format rather than providing detailed implementation specifics.

This study concludes the following:

1. While managed access had a significant impact within the facilities where it was deployed, other factors unrelated to the technology such as policy changes also contributed to the overall decline of illegal cellphone use throughout the prison system (to include facilities with deployed managed access systems).
2. Good working relationships with nearby cellular carriers are critical.
3. MAS can effectively be implemented in an urban setting. Technology such as Distributed Antenna Systems (DAS) allows operators to refine and control system coverage within tightly constrained environments.
4. DAS deployment is heavily reliant upon physical installation of cable, conduits and other supporting infrastructure. Retrofitting an existing correctional structure is particularly challenging with unique logistical challenges involved with deploying it in areas where inmates reside and securing the system infrastructure from sabotage.
5. Cellular managed access technology only addresses cellular communications capabilities and cannot, for instance, prevent use of non-cellular wireless capabilities, such as Wi-Fi, stand-alone computing or photographic capabilities which have become standard features in modern cellular devices. Managed access mitigates the connection of cellular radio transmissions between a handset and an external (e.g., commercial) network. Elimination of cellular communications capabilities makes other features present in these devices less useful to the inmates that possess them.

Introduction

This report is the second of a set of reports examining the impact of managed access technology on contraband cell phone use in prisons. The focus of this report is the use of Distributed Antenna System (DAS) Technology, deployed in support of cellular Managed Access System (MAS) use in an urban correctional facility—the Maryland Department of Public Safety and Correctional Services (DSPCS) Baltimore City Complex. This report builds upon technical information in a previous assessment of MAS which described operation of managed access technology deployed in a rural correctional facility (the Mississippi State Penitentiary in Parchman, MS)¹, referenced as the “Parchman Report” in the remainder of this report. As with the Parchman Report, much of the technical background material presented herein is presented in a conceptual format rather than providing detailed implementation specifics.

Managed access technology has become an increasingly significant tool for denying inmate use of cellular telephone services. Managed access, in contrast to radio frequency jamming, or passive signal sensing, selectively denies service to unauthorized users.² Passive radio sensing is another category of technology described in the Parchman Report. Passive sensing provides an alternative approach to interdiction of illegal cell phone use, one which recognizes cellular radio signals and alerts a system operator of an active wireless device. Stated in another way, passive sensing technology works in a “listen only” mode which informs physical intervention by prison

¹Grommon, E., Carter, J., Frantz, F., Harris, P., *A Case Study of Mississippi State Penitentiary’s Managed Access Technology*, report to the National Institute of Justice, August 2015, currently under publication review.

² Jamming technology is currently illegal for non-Federal users. The Communications Act of 1934, Section 333 - prohibits willful or malicious interference with the radio communications of any station licensed or authorized under the Act or operated by the U.S. Government (47 U.S.C. § 333). It is a violation of federal law to use a cell jammer or similar devices that intentionally block, jam, or interfere with authorized radio communications such as cell phones, police radar, GPS, and Wi-Fi, see <http://www.fcc.gov/encyclopedia/jamming-cell-phones-and-gps-equipment-against-law>

staff. Unlike managed access or jamming technologies, passive technology cannot directly intervene or mitigate access to cellular services.

In contrast to passive technologies, managed access technology is an active (licensed) technology. Managed access technology is designed to actively manage service requests from cellular devices providing the ability to selectively allow or deny cellular communications to/from cellular devices. Service in this context is limited to voice and/or data calls from cellular devices on cellular network frequencies. Unlike jamming technology, managed access technology mitigates communications to/from approved cellular devices so that legitimate calls be processed and completed, while cellular network service requests to/from non-approved, presumably contraband cell phones are legally disrupted. Managed access use is guided by operational policy and guidelines of the deploying agency³.

Managed access technology “manages” cellular network services available to specific cellular users and/or cellular devices. Like cellular jamming technology, managed access systems actively transmit radio signals on cellular network radio frequency bands so they are subject to FCC licensing, or NTIA authorization^{4,5}. From an operational perspective managed access capabilities and operational effectiveness are relatively new topics and subject to agency choices related to system architecture, system deployment details, and ongoing operation. Total cost of ownership, system functionality, and actual impact on cell phone use, both within and

³ This report uses the terms “call” and “connection” in this document interchangeably to describe a request for service (voice, messaging via text/email/multimedia and/or Internet access) placed from a cell phone via a commercial cellular network.

⁴ This includes bands associated with the commercial cellular service, broadband personal communications and certain advanced wireless services.

⁵ In this paper the terms “active” and “passive” used in context of regulatory and licensing describe technology that actively transmits radio energy using frequencies within commercial mobile service bands (active) or only receive signals in these bands (passive). This is in contrast to usage that describes operational capability, i.e., technology that “passively” disables the use of cellular services from a distance, in contrast to those that simply provide the ability to locate an illegal device; requiring “active” intervention on behalf of prison personnel to seize and disable the illegal devices. Both uses appear in this paper.

outside of the designated managed access coverage area, are topics that can benefit from increased knowledge. Each managed access system deployment will have unique design and implementation challenges associated with both the physical implementation and the local commercial cellular environment within which it resides. This report seeks to further inform the decision process, complementing the Parchman Report by describing an active system operating in an urban environment; specifically managed access systems deployed in the Baltimore MD City Jail Complex.

This report is not a product evaluation; the purpose of this report is to document the managed access use in Baltimore MD, specifically:

- To examine MAS technology operating at correctional facility in an urban setting;
- To describe the use of Distributed Antenna System technology (DAS); and
- To describe how managed access technology using DAS contrasts with managed access using macro-cellular technology⁶.

The Baltimore City Jail Complex

The Baltimore City Jail Complex is operated by the DPSCS and consists of the Baltimore City Correctional Center (BCCC), the Metropolitan Transition Center (MTC), The Baltimore City Detention Center (BCDC), the Chesapeake Detention Facility (CDF) and the Baltimore Central Booking and Intake Center (BCBIC). Only the MTC and BCDC have managed access systems.

⁶ Use of the term “macro cell site” in this report describes use of a small number of relatively high-power base stations located in cell sites designed to cover a large area (for example in a correctional facility located in a rural setting.) This is in contrast to small cell and DAS technologies described in this report.



Source: Google Earth.
 Annotations: Phil Harris Engility Corporation

Figure 1. The Baltimore City Jail Complex

The Metropolitan Transition Center (MTC)

The Metropolitan Transition Center in Baltimore was built in 1811 and it is the nation’s oldest correctional facility. It houses 698 offenders in a minimum security setting. The MTC is operated by the DPSCS and inmates at this facility serve time as the result of a court imposed

sentence. The FY2015 DPSCS appropriation for MTC was \$41,402,746 with 393.6 authorized positions.⁷

The Division of Corrections Annual Report Fiscal Year 2013 states that the MTC offers high school equivalency diplomas (GED) in reading, writing and arithmetic and provides intensive substance abuse treatment through Therapeutic Communities, a program that treats about 200 offenders a year.⁸ Training programs offered by the Maryland Department of Labor, Licensing and Regulation, through the Occupational Skill Training Center include state certification programs in automotive repair and maintenance, roofing, HVAC, information technology, warehousing, carpentry, printing and graphics and plumbing. MTC inmates do not participate in outside details.

The Baltimore City Detention Center (BCDC)

The Baltimore City Detention Center was originally constructed as a jail in 1806. It has been renovated 11 times between 1859 and 1999⁹. In 1991, Baltimore City Jail consisted of seven buildings: five of these were maximum- and medium-security structures. Minimum-security inmates were housed in two satellite facilities. In July 1991, the State took over administration of the jail from the city, and renamed it the Baltimore City Detention Center under the Division of Pretrial Detention and Services (Chapter 59, Acts of 1991)¹⁰. The BCDC now primarily consists of four buildings: the Women's Detention Center (WDC), the Men's Detention Center (MDC), the Jail Industries Building, and the Wyatt Building. The current WDC was opened in 1967 to house female detainees. The FY2015 DPSCS appropriation for BCDC was \$85,338,930 with

⁷ <http://msa.maryland.gov/msa/mdmanual/22dpscs/html/dpscs.html#baltimore>

⁸ <http://www.dpscs.state.md.us/publicinfo/publications/pdfs/DOC2013AnnualRpt.pdf>

⁹ <http://www.mgaleg.maryland.gov/Pubs/Committee/2013-legislative-policy-committee-june.pdf>

¹⁰ <http://msa.maryland.gov/msa/mdmanual/22dpscs/html/22agen.html>

748 authorized positions¹¹. Following corruption issues publicized in April 2013, \$22.7 million has been provided to improve security and staffing within BCDC. Approximately \$15.6 million has been provided to upgrade security cameras, implement a cellular managed access system, install x-ray machines, metal detectors and purchase intelligence software¹².

The BCDC is one of the largest municipal jails in the nation; over 40,000 inmates are committed to the center annually. The daily number of inmates averages over 2,000 of which about 100 are post-sentencing; the remainder are very transient (though there are also a significant number of people who have been released and are returned). Even though the BCDC is a city facility it is operated by the state. It is a jail; inmates typically are serving sentences of less than 18 months. The BCDC is also a pretrial detention facility for any person committed or transferred to the custody of the Commissioner of Pretrial Detention and Services. The Center may house any person held in custody by any agency of the Department of Public Safety and Correctional Services. In January 2015, a bill was introduced into the state legislature to transfer ownership of BCDC from the state back to the City of Baltimore.¹³

Nearby Jail Complex Facilities

There are additional facilities operated by the Division of Corrections located nearby, including:¹⁴

- The Baltimore Pre-Release Unit (BPRU) and Occupational Skills Training Center (OSTC).

¹¹ <http://msa.maryland.gov/msa/mdmanual/22dpscs/html/dpscs.html#baltimore>

¹² See http://mgaleg.maryland.gov/2015RS/fnotes/bil_0000/hb0210.pdf

¹³ Maryland House Bill 210 has been introduced in 2015. It will abolish the Division of Pretrial Detention and Services within the Department of Public Safety and Correctional Services; providing for the transfer of property, assets, licenses, credits, and rights of the Baltimore City Detention Center to the Mayor of Baltimore City; requiring the State to pay all the operating and capital costs of the Baltimore City Detention Center in fiscal years 2016 through 2018 and one-half the costs in 2019; providing that Baltimore City pay all the operating and capital costs in fiscal year 2020. See

<http://mgaleg.maryland.gov/webmga/frmMain.aspx?id=hb0210&stab=01&pid=billpage&tab=subject3&ys=2015rs>

¹⁴ <http://www.baltimoresun.com/news/maryland/bs-md-youth-jail-20150513-story.html>

- The Chesapeake Detention Facility (CDF)
- The Maryland Reception Diagnostic and Classification Center (MRDCC)
- The Baltimore City Correctional Center (BCCC)
- The Baltimore Central Booking and Intake Center (BCBIC)

Technology and Illegal Cell Phone Management

The illegal use of contraband cell phones by inmates to access commercial cellular services continues to present operational challenges to correctional agencies and jail operators. The term “cell-phone use” in this report, specifically in the context of managed access, is the use of an illegal cellular device in a prison or jail to obtain commercial cellular voice or data services. The term “managed access” describes a category of technology or process, rather than a specific commercial product. Managed access systems from multiple vendors are currently in service, or authorized for deployment, in California, South Carolina, Texas, Maryland and Mississippi (see FCC NPRM 13-58 page 6, 2013). In early 2015 the Alabama Department of Corrections requested funds to install managed access technology at four correctional institutions¹⁵. Fundamentally, all managed access products are deployed to accomplish the same task: to disrupt illegal cellular communications. Managed access technology is being deployed or considered for deployment because, unlike jamming technology, FCC regulations facilitate a legal path for its adoption and use. The use of jamming technologies has been publicly demonstrated and the effectiveness of jamming technology in some venues has also been documented.¹⁶ This report acknowledges jamming technology as a potential alternative for which legality is currently under debate. This report neither advocates for jamming, nor suggests that

¹⁵ See http://www.al.com/news/index.ssf/2015/04/alabama_prisons_planning_syste.html#incart_river

¹⁶ For more information about jamming see <http://www.wjbf.com/story/21716332/sc-prison-cell-phone-jamming-demonstration-conducted> and http://www.ntia.doc.gov/files/ntia/publications/contrabandcellphonereport_december2010.pdf and <http://wisconsinlawreview.org/wp-content/files/3-Fitzgerald.pdf>

jamming is unsuitable for mitigation of illegal cell phone use. As of the writing of this report, radio frequency jammer use by non-Federal agencies remains illegal in the United States and evaluating it as a technology is beyond the scope of this report.

As this report was written many regulatory aspects specific to MAS deployment and implementation continue to be under FCC regulatory review. FCC proceedings are underway to examine deployment regulations to include cellular network spectrum lease issues and carrier notification obligations to MAS operators following changes in nearby commercial cellular networks. The impact of these proceedings on future managed access deployment and operation will remain unknown until the proceedings are complete.

Generic managed access functionality was documented in the Parchman Report, and is re-published as Appendix B: Managed Access Technology, of this report to provide complete context for the following discussion. Readers unfamiliar with the concepts of managed access technology should read the Appendix before proceeding through the remainder of this report. This report emphasizes managed access using distributed antenna systems (DAS) based radio access network technology. The Parchman Report described a different approach, the use of more traditional macro site technology, as deployed at a rural correctional facility. Technologies like DAS (and small cells) were not addressed in the Parchman Report because they were not part of that system.

Details of cellular provider networks near these correctional facilities and/or related cellular technology protocols are not provided. Since this report is not a product evaluation, specific managed access system network interfaces and vendor-specific product features are not described. Terminology used is intended to be generic with exception to references specific to

the system provider for the agencies noted in this report¹⁷. Each deployment of managed access capability will have the similar goals, but to achieve those goals each system needs to be designed to address location-specific unique physical and environmental characteristics regardless of the chosen managed access technology, or product. Each system design is dependent upon facility-specific physical constraints and characteristics of the local commercial wireless environment. Because of these unique requirements, concepts associated with the topic of managed access coverage are presented in a generic manner, independent of venue-specific implementation choices.

Network Coverage and Managed Access

Wireless coverage associated with a managed access system radio access network (RAN), and how the RAN interacts with nearby commercial cellular networks, is a baseline consideration for any managed access deployment, regardless of the underlying technology used to establish this coverage. Managed access technology is used to establish a RAN that is in essence a multi-carrier multi-band cellular network, of limited scope and coverage. Managed access system RAN coverage is designed to present the dominant network signal within its designed coverage area; an area legally defined by geographical boundaries established in FCC approved cellular carrier spectrum leases. RAN coverage may be designed to span an entire correctional facility or at a minimum, coverage within specific areas within that lease area deemed by correctional officials to present the greatest risk. The managed access RAN presents itself as an extension of nearby commercial cellular networks, allowing it to capture transmissions from cellular user devices (e.g., cell phones, cellular equipped computers/tablets).

¹⁷ Being generic also avoids the pitfalls of using endless variation of technical jargon associated with multiple generations, and versions, of cellular networking technology currently in use; each of which must be addressed by cellular mitigation technologies.

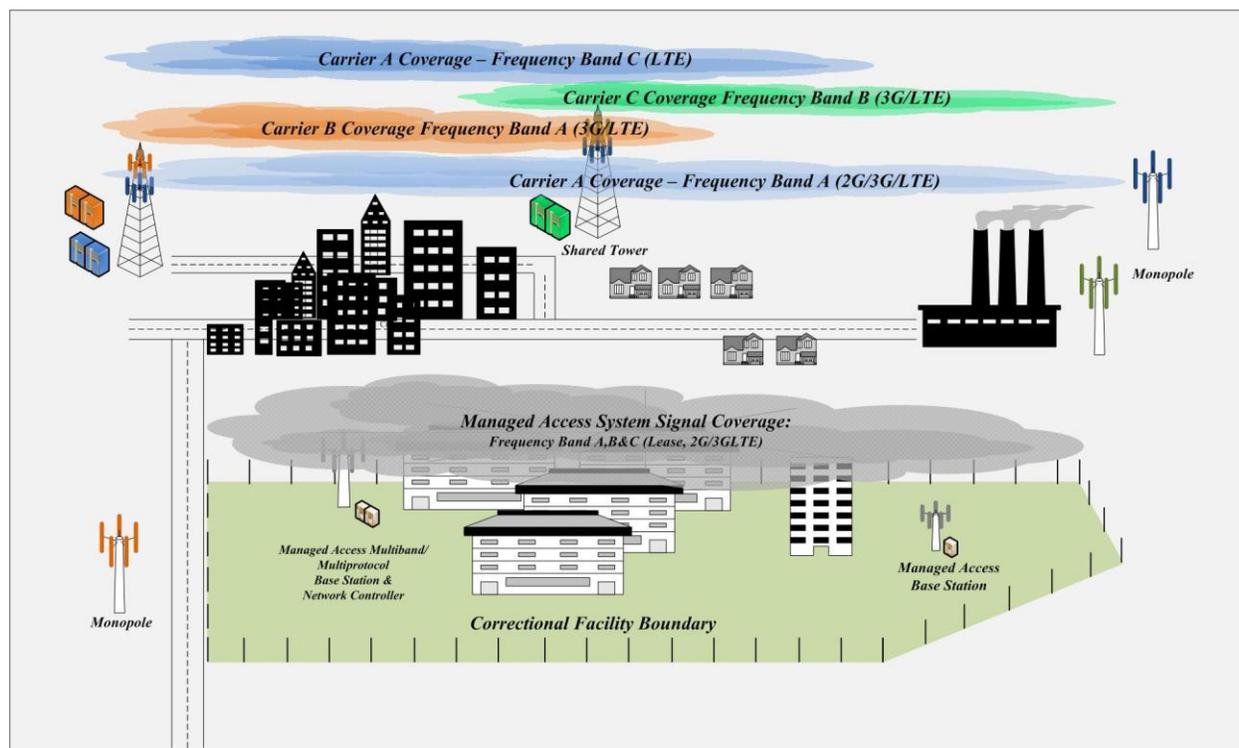
Managed access processes control all cellular communications capabilities associated with devices connected to the RAN.

The topic of RAN coverage is presented, in a simplified way, in Figure 2 and **Error! Reference source not found.**¹⁸ Areas with grey shading are intended to depict managed access RAN coverage as an underlay to commercial network RAN coverage. Note that a managed access system operator has a legal obligation to ensure that system coverage is contained within areas/parameters defined by their spectrum lease. This is in contrast to an operational need to establish and verify managed access operational effectiveness inside of its defined coverage area. A managed access RAN is activated and calibrated so that meets obligations associated with carrier spectrum leases and FCC rules first followed by optimizations related to effectiveness. Ongoing compliance testing requirements and methodology related to spectrum lease. Compliance testing can occur on a regular schedule or in an ad-hoc fashion; exact requirements and testing procedures need to be defined via spectrum lease details.

After all spectrum-lease obligations are achieved and confirmed through testing, the system can be further optimized to minimize coverage holes and maximize operational effectiveness inside operational boundaries. Testing obligations and methodology associated with ongoing managed access performance goals, related to operational effectiveness within coverage boundaries, are completely agency-defined because agency operational goals are not constrained by mandatory spectrum lease or Federal regulatory constraints. Operational requirements within the coverage area should be documented in a concise technical manner by the deploying agency, and clearly defined as a performance requirement in procurement documents if the deploying agency intends to make ongoing performance verification part of a

¹⁸ RAN coverage depicted in this way is acknowledged to be overly simplistic from a technical perspective, but adequate to convey concepts.

contractual requirement. Costs associated with operational performance testing obligations must be understood by system operators, system suppliers, and end users. If an agency intends to use internal agency resources for recurring performance testing, then the associated operational costs and testing methodology should be well defined.

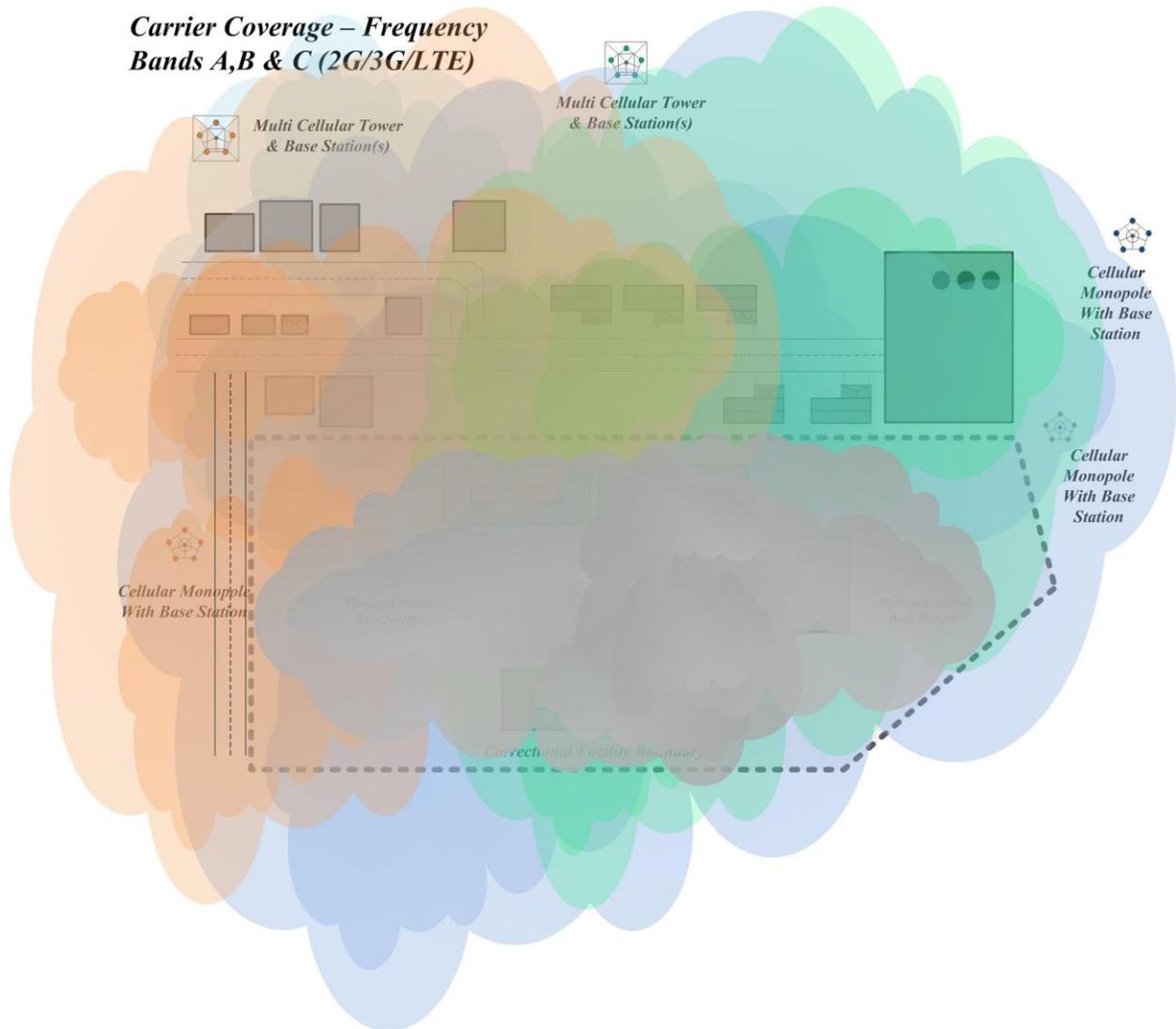


Source: Phil Harris, Engility Corp.

Figure 2. Conceptual View a Managed Access System RAN Signal Coverage

Figure 2 and **Error! Reference source not found.** show managed access network RAN signal coverage. It is designed to overwhelm signals from nearby commercial network towers (i.e., nearby carrier RANs). A simplified way to envision this is to think about managed access RAN signal coverage as a cloud of radio energy that sits between illegal cellular devices and nearby commercial cellular networks. Commercial network RAN signals are overwhelmed by signals from the managed access system RAN. Cellular devices operating within the managed access RAN connect to the managed access cellular network; this is analogous to, but not quite

technically the same as, roaming processes that routinely occur between commercial cellular networks.



Source: Phil Harris, Engility Corp.

Figure 3. Conceptual View Managed Access RAN Signal Coverage Underlay

With managed access, a cellular device connects to the managed access RAN as if it were part of a commercial carrier's network. Once a cellular device is captured by a managed access system, unique identifying information retrieved from the device is compared against a list of known authorized devices. An authorized list is commonly referred to as a "white list". If a device is documented on a white list (indicating system operator authorization) the MAS will re-

direct that device to the commercial network for call completion. If a device is not authorized and included on the list, then service requests to or from a captured device are denied.

In managed access all connected devices are, by definition, assumed to be contraband and blocked by default. Authorized handsets appear on an exception list called a “white-list.” Conversely, commercial carriers employ “black-lists” by to deny service to specific handsets, assuming all other connected cellular devices are authorized by default (assuming a valid cellular service agreement is in place.)

Managed access system technology-related choices are important. Regardless of the underlying wireless technology used to provide managed access RAN signal coverage, once a device is captured managed access network processes mitigate access to cellular services. Disposition of wireless service requests associated with devices falling under the control of any managed access network is dependent on MAS functions riding atop the RAN. Correctional facility policies, regulations, and guidelines ultimately define how a MAS operates.

MAS Architecture: Macro versus Small Cells versus DAS

Effective managed access RAN coverage, regardless of the underlying cellular technology, is critical to facilitate consistent capture of cellular devices. Managed access via DAS technology is presented to illustrate how DAS-based managed access contrasts with and complements traditional cellular macro-site and small cell technologies.

MAS RAN coverage throughout large open spaces can often be established using cellular topology based on a small number of relatively high-power base stations located in cell sites designed to provide coverage throughout a relatively large area (e.g., in a correctional facility located in a rural setting.) In a commercial network macro sites would be spaced to provide overlapping and continuous regional RAN coverage. This type of cell site technology is

categorized as “macro” cellular technology within this report. In this type of network, macro cellular sites may be supplemented by low-power, location-specific, repeaters and/or small cells which augment RAN coverage within specific buildings or outdoor areas.

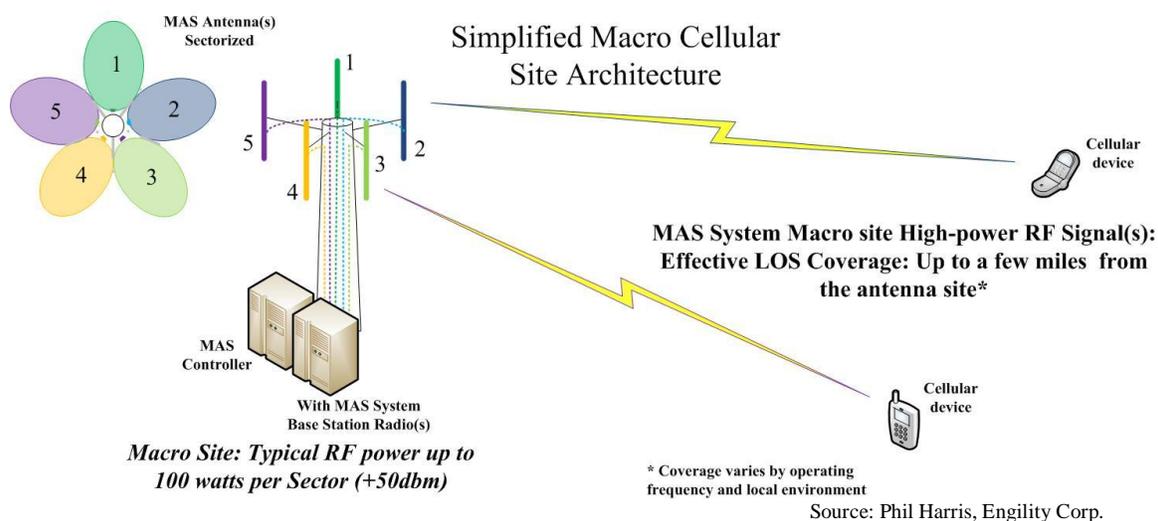
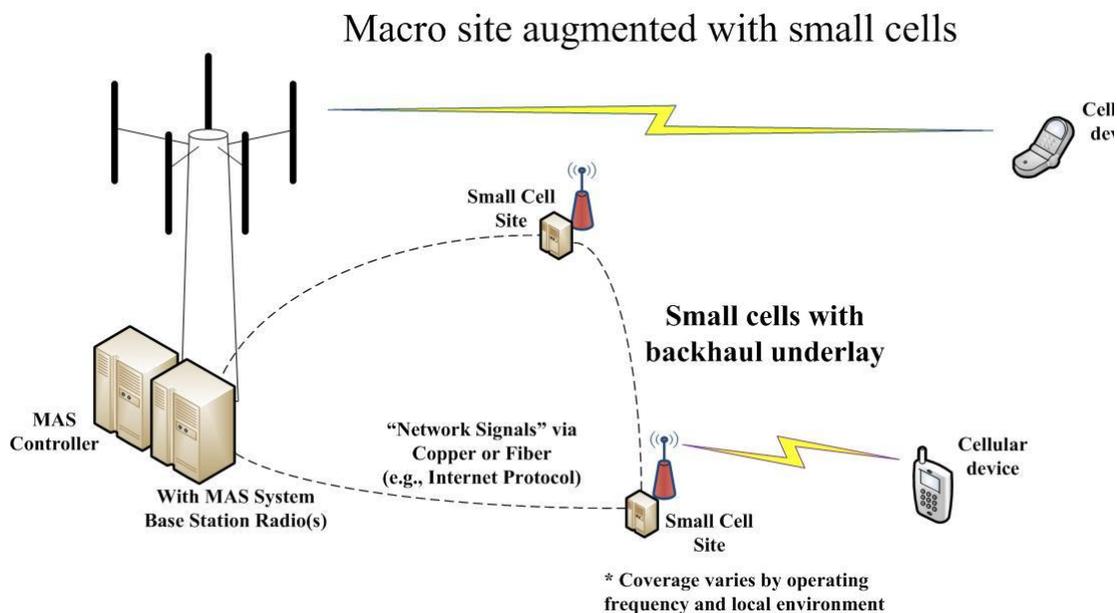


Figure 4. Traditional Macro Cellular Site

Figure 4 shows an example traditional macro cellular site that utilizes a sectorized antenna system (directional antennas each fed by a radio operating on a discrete frequency). Commercial cellular RANs are comprised of many (hundreds/thousands) of similar sites optimized for specific coverage and frequency re-use requirements. Commercial cellular networks use macro cell sites that support mobility so that cellular handsets can be “handed-off” between cellular base stations while maintaining service while users move throughout the network coverage area.

Use of a macro cellular architecture for a managed access RAN is suitable for some applications, but it presents coverage challenges for managed access deployments in correctional institutions located in a densely populated urban environment or for institutions that have a relatively small (or otherwise constrained) footprint. An alternative approach, for this type of constrained environment, is to establish managed RAN coverage via distributed antenna and/or



Source: Phil Harris, Engility Corp.

Figure 5. Small Cells Augmenting Macro Network RAN Coverage

small cell technology. Unlike macro sites, RANs established with distributed antenna and small cell technologies (shown in Figure 5) rely on small antenna systems and relatively low power transmitters.¹⁹

Use of DAS technology within a MAS architecture provides the ability to finely tailor (or augment) RAN network coverage in support of constrained functional environments. Distributed antenna system technology is not unique to managed access; DAS technology is deployed by many commercial operators to augment RAN commercial networks, primarily as a tool to increase capacity or to improve network coverage within specific venues such as office buildings, shopping centers or sports complexes where macro network coverage is inadequate. Low-power DAS and small cell technologies are also becoming increasingly relevant for

¹⁹ Small cell technology is described here to be analogous to DAS in terms of signal coverage, and certainly analogous to distributed antenna technology from the perspective of physical plant requirements. Small cells are not part of the Baltimore deployment, and at the time of this report the authors were not aware of MAS products based on small cell technology. Small cell technology is acknowledged in this report because the technology is becoming an increasingly prevalent within commercial cellular network operations. Understanding the difference between the two technologies clarifies how DAS technology is unique.

commercial operations in densely populated urban areas where frequency re-use in the RAN has become important tool to increase network density and improve network capacity. Network RAN designs based on distributed antenna and small cell technologies, for both managed access and commercial networks, are highly dependent upon the specific venue where they are deployed.

DAS technology and small cell technology are often interchangeable because, from a user's perspective, network services provided through them are indistinguishable. Setting coverage similarities aside, there are significant architectural differences between small cell and DAS technologies. The primary difference between small cell and distributed antenna technologies is how and where network signals and service data are processed within the cellular network. Radio antennas are used within the RAN to establish the wireless interface through the atmosphere by converting electrical signals (at radio frequencies) into electromagnetic waves which are transmitted into the atmosphere (and vice versa in the receive direction.) An important point, in context of DAS technology, is that all wireless signals including digital cellular network wireless signals are analog as they pass through an antenna system.

System and customer data in a small cell network is conveyed through the network, in digital format, all the way to the edge of the network where it is processed by a transceiver into an analog radio signal operating at the desired radio frequency for interaction with the an antenna system. In contrast to small cell technology, network signals in a (optical) DAS system are processed into analog electrical signals, at the RAN operating frequency, at a central location (often referred to as a DAS "head-end") where they are immediately converted from electrical to optical format for transport through fiber optic cable to/from a remote RF head location where the analog radio signal is converted back to an electrical signal at the desired RAN operating

frequency²⁰. Figure 6 depicts an optical DAS system in context of managed access. A centrally located DAS “head-end” can feed multiple remote “RF heads” via optical fiber interconnections.

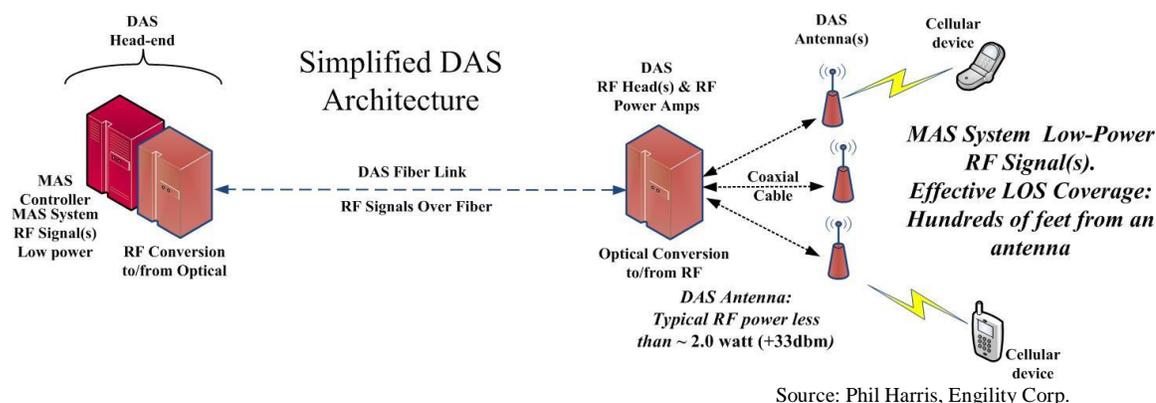


Figure 6. Distributed Antenna System Technology

Cellular communications are obviously bi-directional. In the network transmit (downlink) direction once converted back in to electrical format by the remote RF head, the analog radio signal can be further filtered and processed through an analog amplifier system before the signal is applied to an antenna. The receive (uplink) direction can also be filtered and amplified in a similar way at the remote RF head before conversion from electrical into optical format for transport to the central head end. Depending on system complexity and features, the final transmit power at each antenna can often be fine-tuned remotely to adjust RAN coverage. A prime benefit of DAS technology is that it facilitates centralization of many network functions at a single central location. Because all radio signal processing occurs at a central location, system components at the remote RF head are less complex, and technology upgrades can occur at the head-end location instead of upgrading multiple small cell radio components at remote antenna locations. With DAS the over-all system architecture is less complex. Remote upgrades (within

²⁰ Some DAS technology uses coaxial cable instead of fiber optic technology, eliminating the electro-optical conversion process. The use of coax includes cost and performance trade-offs that are beyond the scope of this report.

hardware limitations) may be implemented without being observed by inmates, resulting in a more secure and safer process.

In a correctional facility managed access functionality, deployed atop DAS RAN technology, requires deployment of fiber optic cables to interconnect the DAS “head-end” with remote optical RF heads. AC Power must be provided at the DAS RF head location to support system telemetry, optical conversion and analog signal amplifiers. Antenna installation usually also requires relatively short coaxial cable runs from the remote RF head(s) to nearby antennas that are optimized for specific frequencies and RAN coverage goals (in some cases it may be useful to think of a single remote head supporting a cluster of nearby antennas.)

DAS deployment usually requires significant infrastructure costs. Logistical support required for the installation of conduit and associated hardware to support of any kind of cable-based signal distribution system is not insignificant, because it is usually “retrofitted” into an existing structure, or series of structures, not originally designed to accommodate it. Installation can involve deployment of extensive hardened cable raceways and/or electrical conduit designed to meet fire and electrical codes while protecting fragile optical and coaxial cables against vandalism. Antenna installations must also be hardened, and installed in a secure fashion. Installation of a DAS usually involves construction within spaces normally occupied by inmates²¹.

Officials in Baltimore noted that inmates were able to sabotage the managed access system by damaging antennas in some locations even though they were installed on walls 15 to 20 feet above the floor. DAS components located in areas only accessible to staff members were also able to be sabotaged. DAS head end equipment, and remote optical radio heads must also be

²¹ Note that this is equally true for any cable-based technology, to include DAS, distributed sensing, or distributed jamming technologies.

secured and protected. Remote management of all active MAS components is critical for diagnosis and understanding of system status prior to entering prisoner occupied areas.

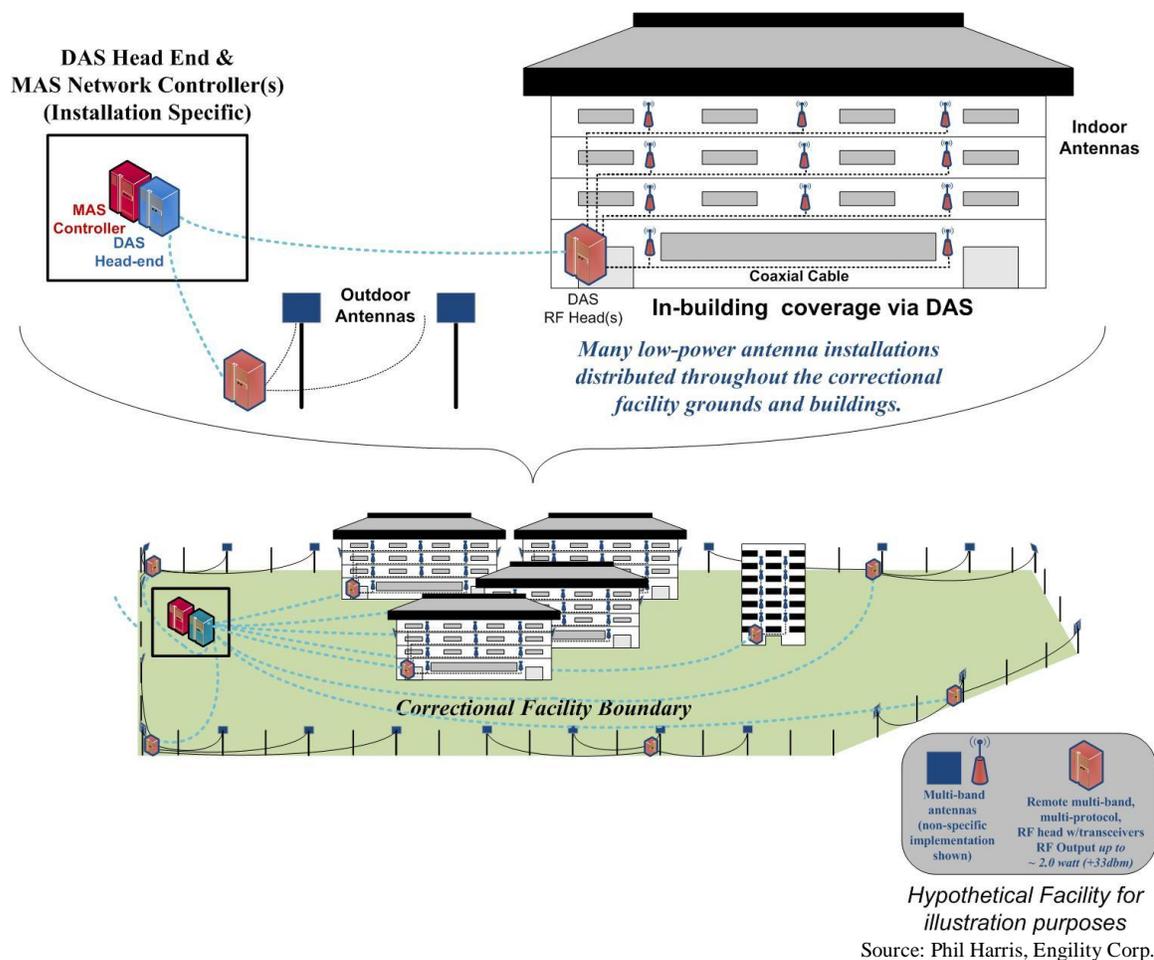


Figure 7. DAS for In-building & Outdoor RAN Coverage

Radio signals rapidly degrade in the atmosphere and the ability of a RAN network to present a dominant signal and maintain effectiveness decreases with increasing distance from a base station antenna. Simply increasing base station transmit power, or optimizing antenna orientation to increase coverage reaches a point of diminishing returns because maintaining desired coverage and effectiveness is a balancing process constrained by the legal obligation to constrain managed access system signals within authorized coverage boundaries. RAN coverage is optimized by carefully optimizing transmit signal power levels at the lease boundary perimeter against those received from nearby commercial networks. The result of this balancing act may be coverage

holes within the facility or within specific buildings where, for a number of reasons, commercial network signals remain dominant. Establishing ubiquitous coverage using macro technology can be complicated because prisons are made from materials that attenuate (block) and reflect RF signals in ways that are often impossible, or impractical to predict. For example, signals from a macro base station located on one side of a jailhouse may be attenuated enough by the building structure to allow an illegal cell phone to connect to a commercial network when used near the opposite side of the same building.

DAS based managed access technology utilizes a network of low-power antenna sites to establish an effective RAN signal throughout a correctional facility. DAS technology allows system operators to establish RAN coverage in a much more granular fashion.

For example, Figure 8 shows a hypothetical correctional facility using DAS technology with directional (e.g., flat panel) antennas around the perimeter of the facility. Antennas deployed in this way around the facility perimeter would focus RAN signal energy inward toward the controlled area, rather than outward in a transmission pattern typical for a centrally located macro antenna system (Figure 9.) The DAS example shown Figure 8 also includes antennas interior to compound buildings. This can be particularly helpful when dealing with irregular-shaped urban coverage areas because RAN coverage can be constrained to specific buildings, or within specific areas accessible to inmates; minimizing the need for the managed access RAN to blanket the entire facility.

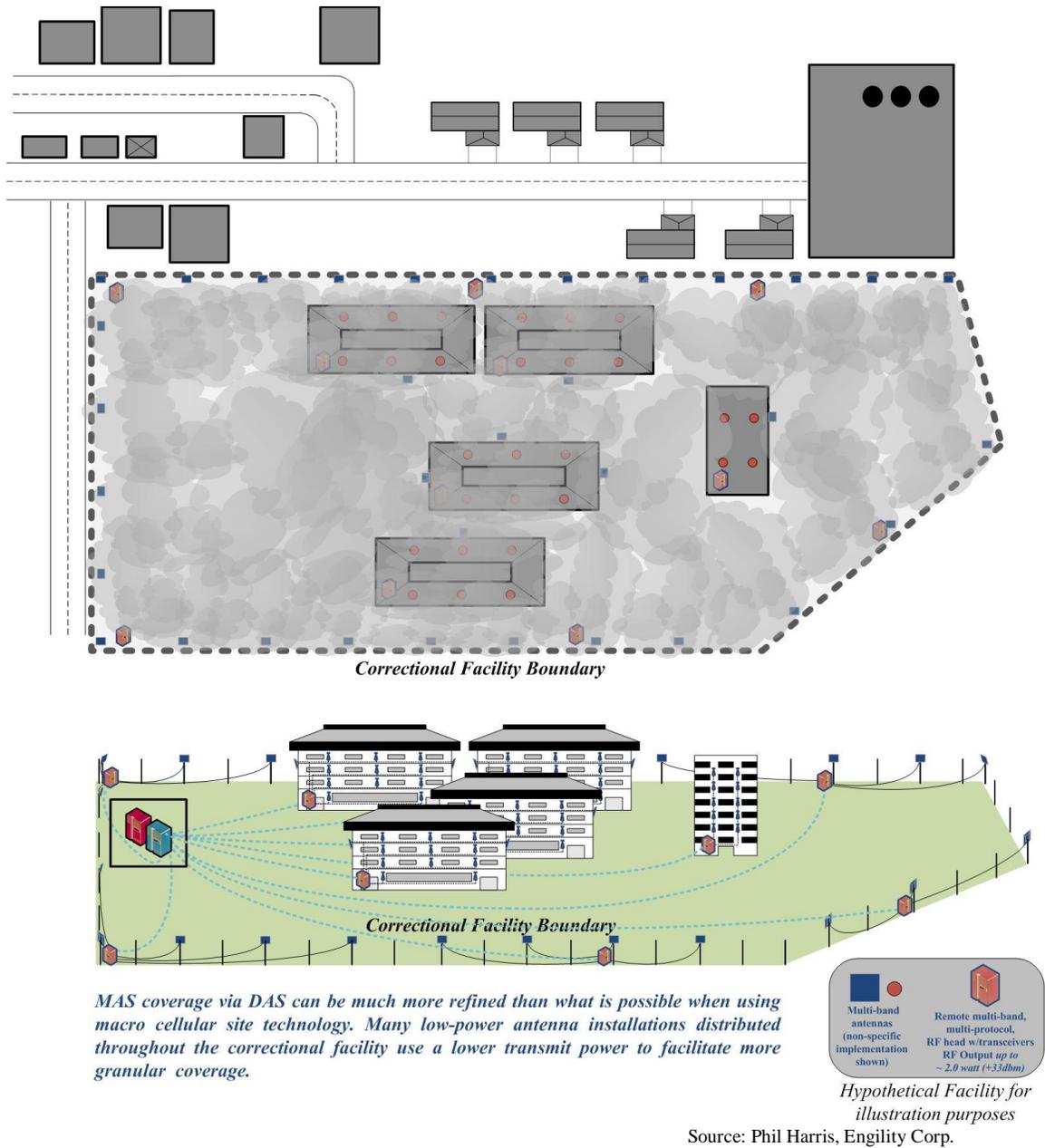


Figure 8. MAS RAN coverage via Distributed Antenna technology

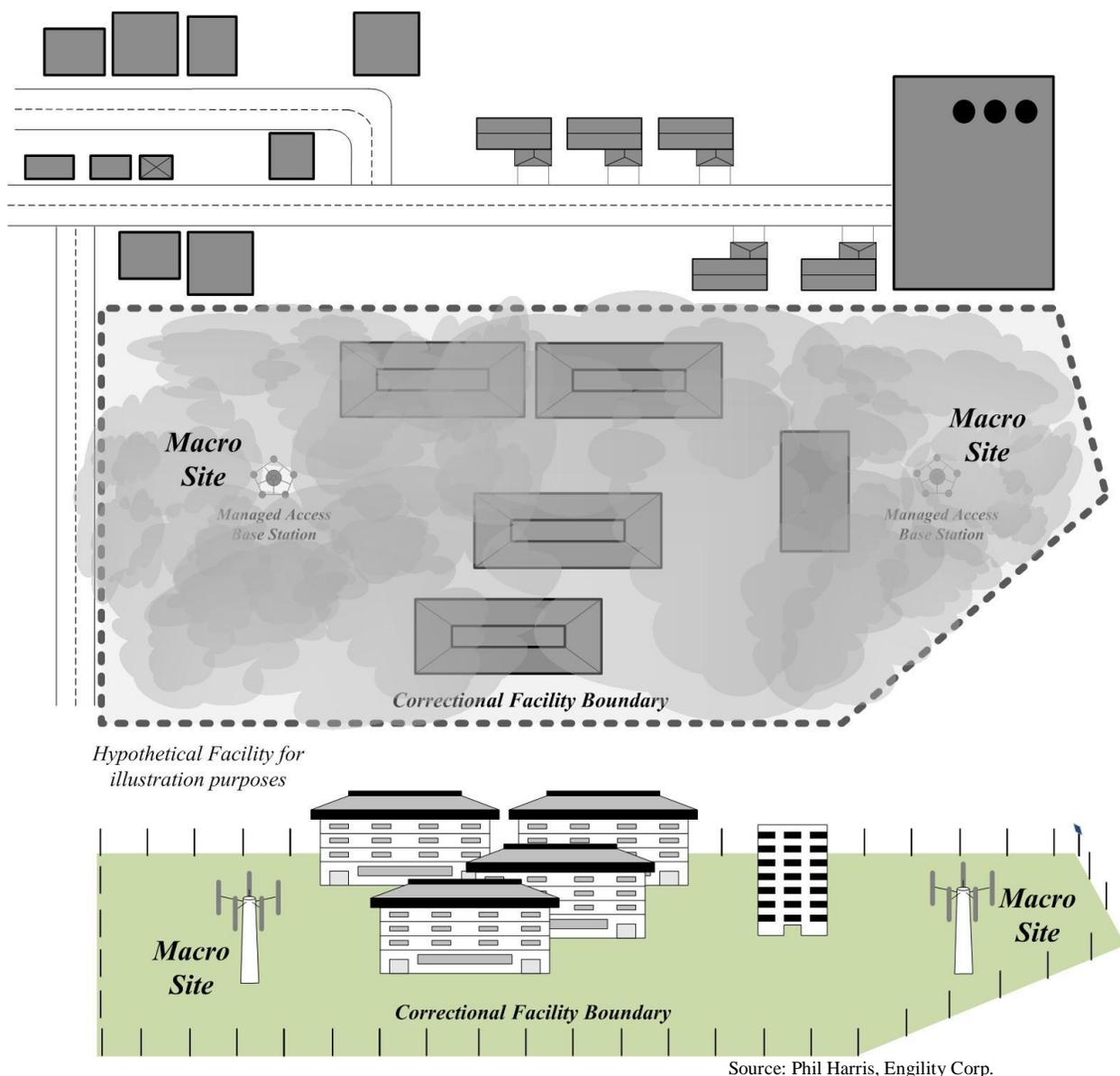


Figure 9. MAS RAN coverage via macro site technology

Rural (Macro) versus (Urban) DAS: A Real World Example

Figure 10 compares the relative coverage area and equipment density of a DAS-based network equipment in an urban setting (Baltimore, MD) to a macro type of installation in a rural location (Parchman, MS). The two areas shown in Figure 10 are scaled to emphasize the difference in size: the two DAS systems in Baltimore City Jail complex use nearly 500 antennas to achieve managed access coverage within a significantly smaller footprint when compared to

the system installed at MSP in Parchman. The Parchman RAN is designed to provide coverage for a significantly larger area, using a single macro cell site with a water tower mounted antenna system (Figure 11.) The Parchman MAS RAN coverage extends throughout an area of approximately four square miles, via a single macro site augmented with in-building repeaters for coverage inside specific buildings.²² In contrast, the combined coverage of the two urban DAS-based systems in Baltimore cover approximately one million square feet of building space located within a single (~1200 x 1200 square foot) city block.

²² Source: Tecore

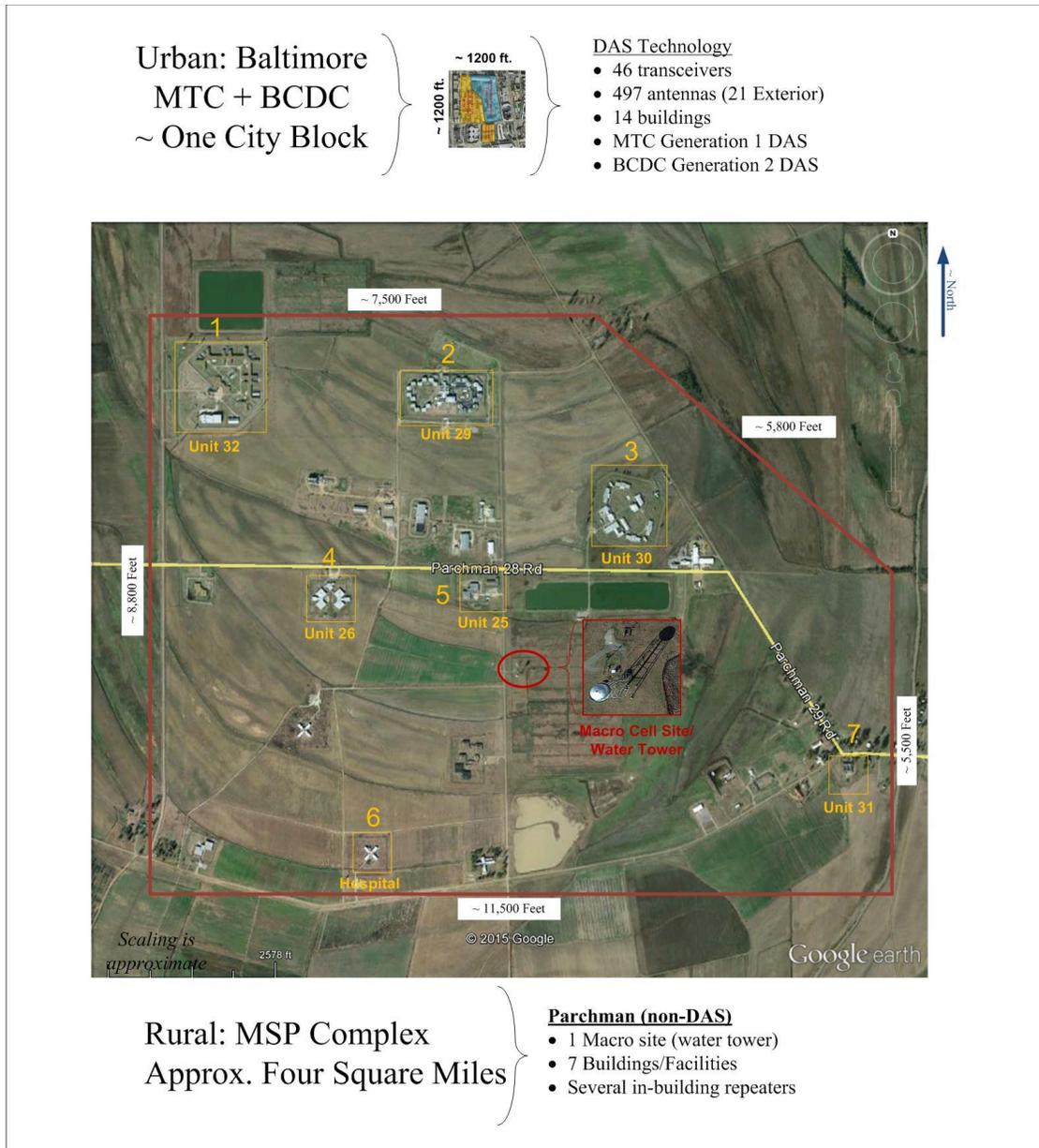


Image Source: Google Earth
Data Source: Tecore
Annotations: Phil Harris Engility Corporation

Figure 10. Urban/DAS in contrast to Rural/Macro based MAS



Image Source: Google Earth

Data Source: MSP

Annotations: Phil Harris Engility Corporation

Figure 11. MSP Parchman Complex and Surrounding Area

The DAS-based systems in Baltimore use a total of 46 transceivers feeding 496 antennas (475 interior + 21 exterior) to provide RAN coverage spanning 14 buildings (see Figure 12.)

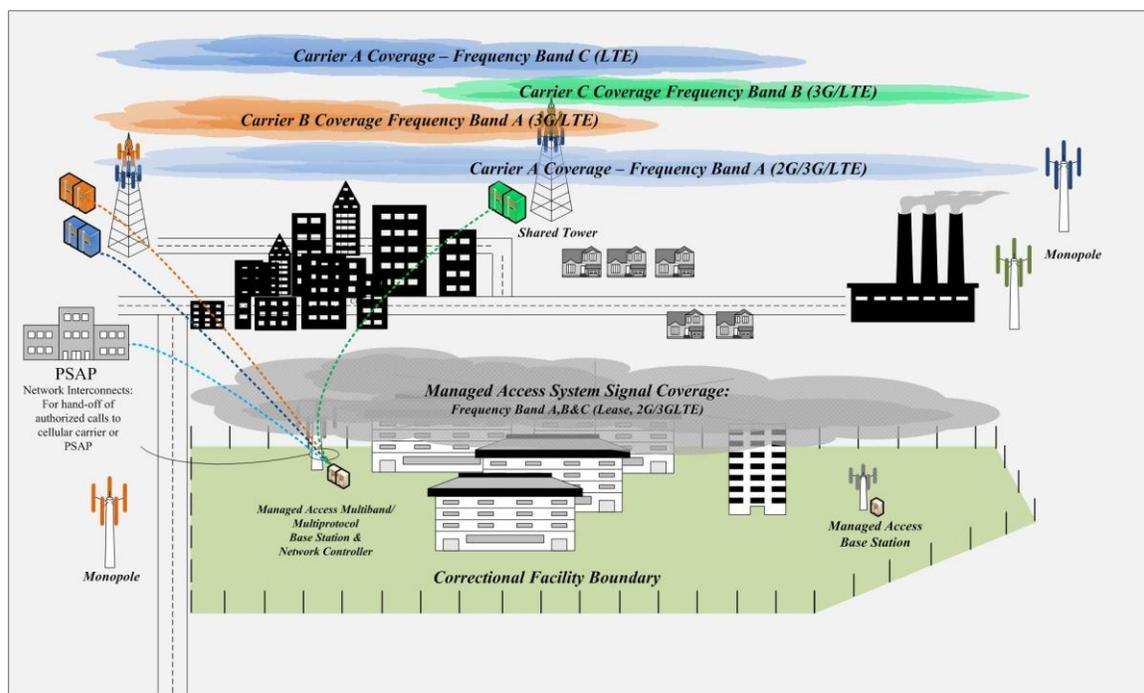


Image Source: Google Earth
 Annotations: Phil Harris, Engility Corp
 Tecore provided system data

Figure 12. Baltimore MTC and BCDC Managed Access Systems

System Interconnections: 911 and Other Authorized Calls

Procedures for handling of legitimate emergency service (911) call requests placed via the MAS will be dependent upon local agency MAS policy, state and local regulations, and FCC rules which legally define what a legitimate service request is. Depending on local policy, 911 calls may be triaged locally within the facility, routed directly to cellular carriers for further processing, or routed directly to an appropriate public safety answering points (PSAP). The latter case is how 911 calls are managed by the Mississippi State Penitentiary (MSP) in Parchman. In contrast to MSP, any 911 call processed by the MAS in Baltimore is routed to a correctional facility master control center for triage by correctional personnel.



Source: Phil Harris, Engility Corp.

Figure 13. Managed Access System and Cellular System Interconnections

To directly route legitimate 911 calls to a nearby PSAP, network connectivity is required between the managed access network and nearby cellular carrier networks and/or directly to the local/regional PSAP. These interconnections are acknowledged and depicted in Figure 13. Implementation choices and the cost of these interconnections are subject to local requirements that define implementation choices and PSAP driven policies. It is important that MAS operators consider agency policies, physical implementation issues, and ongoing operation of any inter-network connections to ensure associated one-time and recurring operating costs are acknowledged.

Managed Access Technology at the Baltimore City Jail Complex

Officials from the Maryland Department of Public Safety and Correctional Services (DPSCS) indicated that the incentive for seeking a solution to illegal cell phone use within the Baltimore complex increased significantly following use of an illegal cell phone to arrange a

successful “hit” on a witness. This hit was arranged, or ordered, using an illegal cell phone within Baltimore City Detention Center (BCDC). DPSCS indicated that they were not entirely sure if managed access technology could be successfully deployed in the city. The MTC complex had a higher number of cell phone confiscations, and deployment of a system at the MTC was less complicated than it would be at BCDC, so DPSCS decided to deploy managed access at the MTC first. A managed access system was subsequently installed at BCDC in April 2013, as part of an emergency procurement following the indictment of 13 BCDC correctional officers for smuggling contraband.

Prior to deploying managed access in the Baltimore complex, traditional security practices were in place. For example, there are two points of entry to the BCDC facility: the main entrance/lobby for civilians/staff and a sally port for prisoner processing. The front lobby is the primary entry point for the facility. Metal detectors are used to screen visitors and employees at these entry points, in conjunction with physical searches, x-rays of incoming packages, and vehicle searches. All inmates are searched upon entry or exit to/from the facility. These security procedures remained in place when the managed access systems were installed.

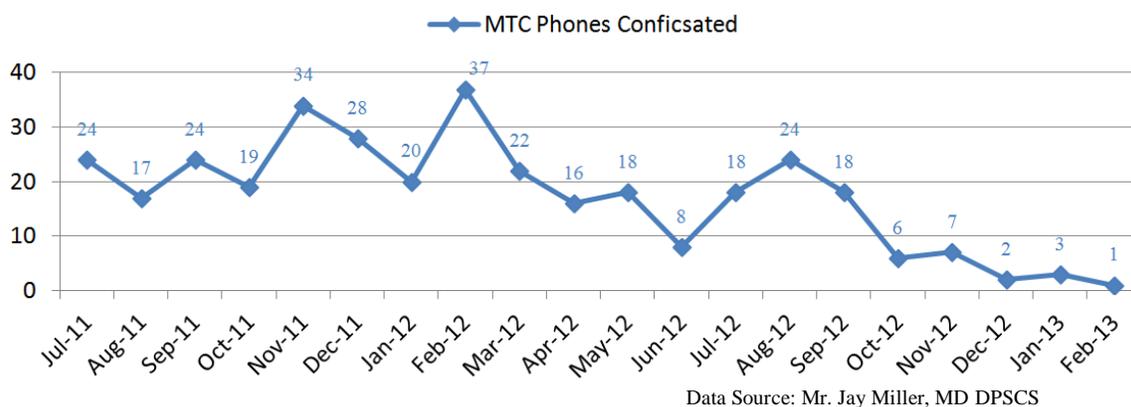


Figure 14. MTC Cell Phone Confiscations July 2011 – February 2013

In general as noted in the number of illegal cellular devices confiscated at the MTC has declined, and data provided by DPSCS in February 2015 indicate that there had been no cell phone confiscations at that facility since April 2013.

Note that the annual fiscal year in Maryland runs from July 1– June 30, so FYTD, as of mid-January 2015, essentially covered a six and a half month period. Figure 17 and Figure 18 summarize the number of non-routine housing searches in the MTC and BCDC facilities for fiscal year 2010 through mid-January in 2015. These data suggest positive effect of managed access technology in regard to possession and use of illegal cellular devices.

MAS Deployment in Baltimore

Both the MTC and BCDC managed access systems utilize DAS technology. The system in the BCDC (yellow in Figure 1) is the newest/most recently installed and it is based on a more recent generation of DAS technology. Both systems were provided by the same manufacturer, Tecore. The two systems are separate and RAN coverage does not overlap, however there is a fiber optic control link between the two systems which provides redundancy in case of control system failure.

MTC Managed Access

The MTC complex (blue in Figure 1) is comprised of 15 transceivers and 172 antennas (including 13 outdoor antennas). It provides coverage for 8 buildings. The MTC managed access system was authorized under contract in April 2012 and activated a year later, in April 2013, following a 19 month purchase and deployment period²³.

- September 27, 2011: initial RFP was released.

²³ This timeline provided did not include time required to prepare and release an RFP process that initiated the procurement.

- October 12, 2011: a pre-proposal conference was held.
- November 9, 2011: proposals were submitted.
- February 2012: the Secretary approved the recommendation of award.
- April 18, 2012: the Board of Public Works approved the contract.
- April 19, 2013: Final acceptance testing completed.

In an April 2012 press release, the DPSCS announced that the state agreed to pay Tecore approximately \$2 million dollars to install the MTC managed access system and following a 60-day trial evaluation, enter into a three year service contract. DPSCS budget documents indicate that approximately \$600,000 of the MTC project funding was provided by the Federal government²⁴. A press announcement indicated that if the MTC MAS deployment was successful other facilities would be considered for deployment.²⁵ All FCC and spectrum lease issues were handled by the system supplier and the MTC managed access system was activated in 2013 at a cost of approximately \$2,000,000.²⁶

BCDC Managed Access

In contrast to the MTC deployment, the BCDC managed access system is comprised of 31 transceivers, 325 antennas (including eight exterior) for coverage that encompasses six buildings. The BCDC deployment was accelerated and deployed via an emergency procurement process that was initiated on May 7, 2013. The BCDC managed access system was activated in 2014; system acceptance occurred on January 4th, 2014 following a deployment timeline of just under

²⁴ See http://www.dpscs.maryland.gov/publicinfo/news_stories/in_the_news/20120423c.shtml and <http://mgaleg.maryland.gov/pubs/budgetfiscal/2015fy-budget-docs-operating-Q00-DPSCS-Overview.pdf>

²⁵ See http://www.dpscs.maryland.gov/publicinfo/news_stories/in_the_news/20120420a.shtml

²⁶ See http://www.dpscs.maryland.gov/publicinfo/news_stories/in_the_news/20120420a.shtml

7 months. The system supplier handled all FCC/spectrum lease issues for this system as well. Funding for this system was included in a, \$4,714,647, FY2014 deficiency allocation.²⁷

DPSCS noted that the end date of the newer BCDC contract was aligned with the end date of the MTC contract so support for both systems can be renewed via a single competitively awarded service contract. DPSCS indicated that the initial period of performance for the MTC service contract will end in October, 2015. At the time of this report, the MD DPSCS was initiating the RFP process to procure ongoing maintenance of these two systems following the current end date.

System Testing and Operation

MAS RAN coverage related to spectrum lease compliance should be followed by performance related acceptance testing. This was accomplished by the system vendor and prison staff to check/validate RAN coverage using commercial cellular handsets. System performance acceptance criteria specified for the Baltimore facilities requires network coverage throughout 98% of defined points within the prison; a point is defined by a physical location, a commercial carrier, and a cellular technology. DPSCS indicated that staff members also conduct ongoing coverage testing on a monthly basis, using a defined grid pattern check and confirm coverage inside each facility. Staff members also make spot checks outside of buildings, but they generally do not conduct a comprehensive outdoor test. Tecore conducts tests outside each facility on a regular basis, and the commercial carriers can also test to verify that there is no RAN coverage outside the authorized managed access system footprint.

²⁷ This total also included funding to deploy video cameras at the Baltimore Central Booking and Intake Facility. No further breakdown of this total is noted. See <http://mgaleg.maryland.gov/pubs/budgetfiscal/2015fy-budget-docs-operating-Q00-DPSCS-Overview.pdf>

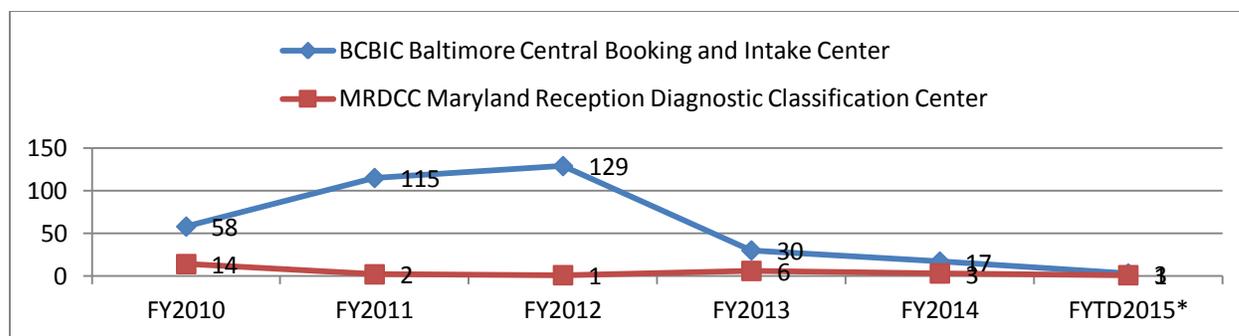
DPSCS noted that system complaints received were general in nature, and not related to specific calls being blocked. Since the BCDC was accepted, a DPSCS representative noted that he was only aware of one call incorrectly captured originating from a nearby legitimate user.²⁸

DPSCS indicated that interaction with commercial carriers had been, in general, fairly smooth, stating that the major carriers (AT&T, Verizon, T-Mobile) have corporate managed access support units to interface with managed access vendor and correctional facility deployment teams. It was also noted that, for the most part, these support units are technical in nature and do not address policy or spectrum leasing issues. DPSCS also indicated that carriers do not provide much advance information about changes to their networks; therefore managed access system operators must continue to operate and manage their systems in a reactive rather than proactive posture. Both Baltimore MAS maintenance contracts require the system provider to upgrade the system in response to technology and/or coverage changes in the nearby commercial cellular environment.

BCBIC and MRDCC

Approximately \$7.2 million in funding was allocated in the FY2015 DPSCS budget to deploy managed access technology at the BCBIC and MRDCC. This award, if placed, would extend managed access coverage to nearly all buildings within the Baltimore complex. As shown in Table 1 and Figure 15, the rate of illegal cell phone seizures in these facilities has fallen significantly without managed access technology in place.

²⁸ Two separate incidents were reported in the media shortly after the system was activated. See http://articles.baltimoresun.com/2014-02-09/news/bs-md-ci-jail-cellphone-blocking-issues-20140208_1_cell-phone-city-jail-tavon-white



*Through January, 2015

Data Source: <https://data.maryland.gov/Public-Safety/DPSCS-Data-Templates-Directory/rvm2-6rkn>

Figure 15. BCBIC and MRDCC Cell Phone Seizures

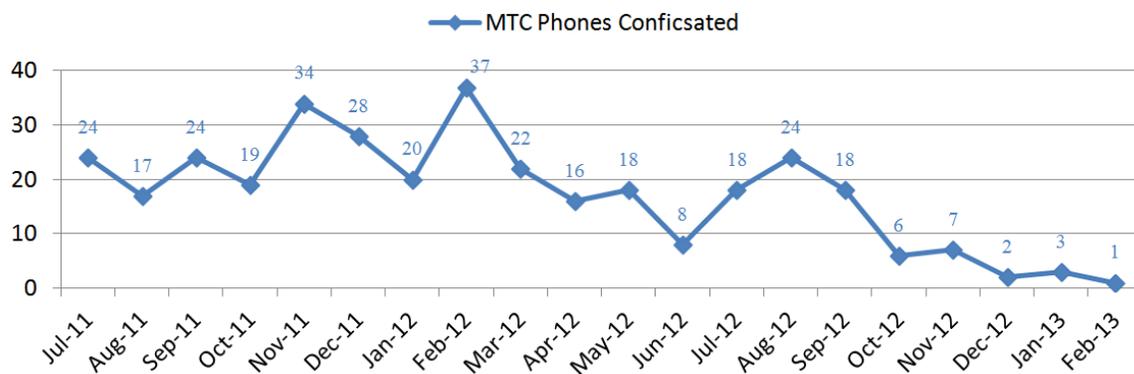
The (January 2015) DPSCS Fiscal 2016 budget overview indicates that funding for these systems has been eliminated:

“The department’s fiscal 2015 appropriation includes nearly \$7.2 million in general funds to implement cell phone managed access systems at the Baltimore Central Booking and Intake Center (BCBIC) and the Maryland Reception, Diagnostic, and Classification Center (MRDCC). Although the department had plans to expand implementation of managed cell phone access systems, which are already in place at the Metropolitan Transition Center and the BCDC, the fiscal 2016 allowance does not include funding for new systems. The department has not yet awarded a contract for the managed access systems at BCBIC or MRDCC.²⁹”

Conclusions

In general, as noted in Figure 16 the number of illegal cellular devices confiscated at the MTC has declined, and data provided by DPSCS in February 2015 indicate that there have been no cell phone confiscations at that facility since April 2013.

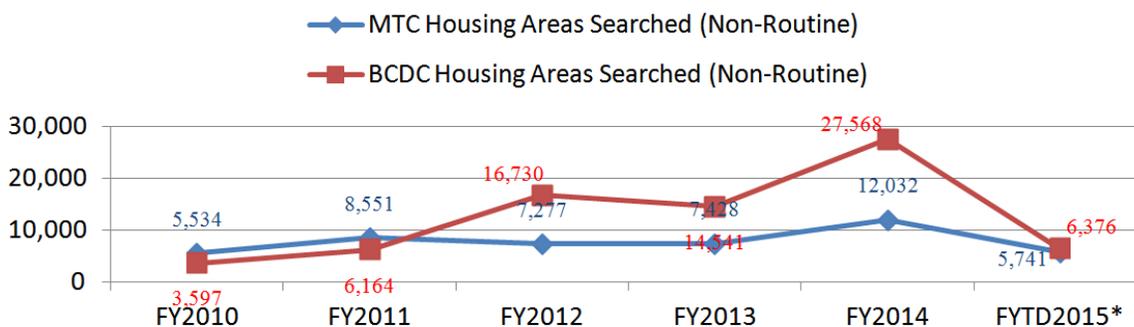
²⁹ See <http://mgaleg.maryland.gov/pubs/budgetfiscal/2016fy-budget-docs-operating-Q00-DPSCS-Overview.pdf>



Data Source: Mr. Jay Miller, MD DPSCS

Figure 16. MTC Cell Phone Confiscations July 2011 – Feb 2013

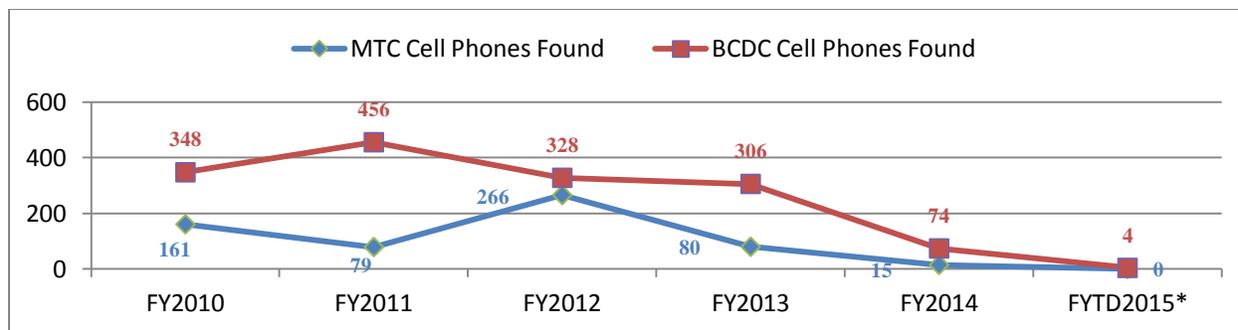
Figure 17 and Figure 18 summarize the number of non-routine housing searches in the MTC and BCDC facilities for fiscal year 2010 through mid-January in 2015. These data suggest a positive effect of managed access technology in regard to possession and use of illegal cellular devices. Figure 19 suggests that the availability of controlled dangerous substances also declined following the deployment on managed access technology.



*As of mid-January, 2015

Data Source: Mr. Jay Miller, MD DPSCS

Figure 17. MTC & BCDC Cell Phone Searches 2011 – 2015

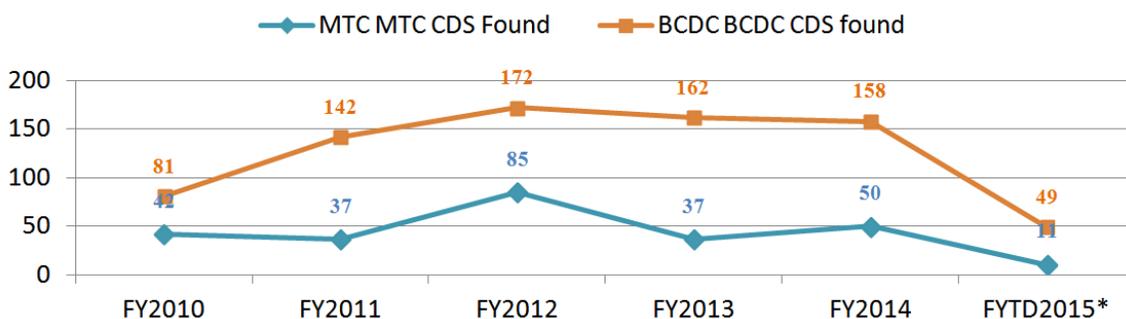


*Through January, 2015

Data Source: <https://data.maryland.gov/Public-Safety/DPSCS-Data-Templates-Directory/rvm2-6rkn>

Figure 18. MTC & BCDC Cell Phone Confiscations 2011 – 2015

Figure 19 suggests that the availability of controlled dangerous substances may have also declined following the deployment of managed access technology.



*As of mid-January, 2015

Data Source: Mr. Jay Miller, MD DPSCS

Figure 19. MTC & BCDC Controlled Dangerous Substances (CDS) 2011 – 2015

Data retrieved from publicly available Maryland Open Data Portal describes illegal cell phone seizure rates system-wide³⁰. This data are summarized in Table 1 and they indicate that, system-wide, the rate of contraband Inmate cell phones found within Maryland correctional facilities has fallen in recent years. This trend is apparent both for facilities equipped with Managed Access technology as well as within facilities not equipped with the technology. A significant conclusion that can be made is that while managed access had a significant impact within the facilities where it was deployed, other factors unrelated to the technology such as policy changes also contributed to the overall decline of illegal cellphone use throughout the

³⁰ Data for each facility obtained via the Maryland Open Data Portal at <https://data.maryland.gov/Public-Safety/DPSCS-Data-Templates-Directory/rvm2-6rkn>. This data shown above was retrieved on July 1st, 2015.

prison system (to include facilities with deployed managed access systems). When queried about this overall trend system-wide, DPSCS suggested that increased vigilance implemented through policy changes, as well as increased mandatory penalties for those caught with an illegal device contributed to this reduction. For example, it was suggested that rotating correctional staff between regional prison entrance check points likely impacted the ability for staff members to smuggle in illegal devices. The consequences of possession of an illegal cellular device in a Maryland correctional facility have changed to now include criminal penalties, via misdemeanor charges which can result in up to a 3 year jail sentence. It was also noted that administrative sanctions that can now be levied against prisoners, to include disciplinary segregation and loss of privileges.

Table 1. DPSCS System-Wide Reported Contraband Cell Phones Found

DPSCS Reported Region totals: Contraband Found - Cell Phones	Total Cell Phones Found						Year to Year Change				
	(7/109-06/30/10)	(7/110-06/30/11)	(7/111-06/30/12)	(7/112-06/30/13)	(7/113-06/30/14)	2015 (7/114-1/30/15)	2010-2011	2011-2012	2012-2013	2013-2014	2015 (7/114-1/30/15)
Department-wide	1098	1307	1303	870	281	97	209	-4	-433	-589	-184
North Region Totals	55	24	80	38	44	25	-31	56	-42	6	-19
South Region Totals	259	395	365	357	119	51	136	-30	-8	-238	-68
Central Region Corrections Totals	359	259	373	119	23	9	-100	114	-254	-96	-14
Central Region Detention Totals	425	629	485	356	95	12	204	-144	-129	-261	-83
DPSCS Reported Facility-Specific Contraband Found - Cell Phones	Total Cell Phones Found						Year to Year Change				
	(7/109-06/30/10)	(7/110-06/30/11)	(7/111-06/30/12)	(7/112-06/30/13)	(7/113-06/30/14)	2015 (7/114-1/30/15)	2010-2011	2011-2012	2012-2013	2013-2014	2015 (7/114-1/30/15)
BCCC Baltimore City Correctional Center	158	164	99	8	3	4	6	-65	-91	-5	1
BCBIC Baltimore Central Booking and Intake Center	58	115	129	30	17	3	57	14	-99	-13	-14
BCDC Baltimore City Detention Center (Managed Access in operation)	348	456	328	306	74	4	108	-128	-22	-232	-77
BCF Brockbridge Correctional Facility	148	267	183	99	10	2	119	-84	-84	-89	-8
BPRU Baltimore Pre-Release Unit	22	6	3	7	0	1	-16	-3	4	-7	1
CDF Chesapeake Detention Facility	19	58	28	20	4	5	39	-30	-8	-16	1
CMCF Central Maryland Correctional Facility	2	4	3	18	2	3	2	-1	15	-16	1
DRCF Dorsey Run Correctional Facility*	n/a	n/a	n/a	n/a	1	9	n/a	n/a	n/a	n/a	8
ECI-A Eastern Correctional Institution Annex	2	3	1	0	0	0	1	-2	-1	0	0
ECI Eastern Correctional Institution	1	2	1	4	2	0	1	-1	3	-2	-2
EPRU Eastern Pre-Release Unit	3	2	1	6	3	1	-1	-1	5	-3	-2
JCI Jessup Correctional Institution	34	6	12	23	28	8	-28	6	11	5	-20
JPRU Jessup Pre-Release Unit*	7	41	137	194	12	n/a	34	96	57	-182	n/a
MCI-H Maryland Correctional Institution Hagerstown	2	8	12	0	17	9	6	4	-12	17	-8
MCI-J Maryland Correctional Institution Jessup	15	23	18	12	30	19	8	-5	-6	18	-11
MCI-W Maryland Correctional Institution for Women	0	0	1	0	0	0	0	1	-1	0	0
MCTC Maryland Correctional Training Center	3	4	9	4	4	11	1	5	-5	0	7
MRDCC Maryland Reception Diagnostic Classification	14	2	1	6	3	1	-12	-1	5	-3	-2
MTC Metropolitan Transition Center (Managed Access in operation)	161	79	266	80	15	0	-82	187	-186	-65	-15
NBCI North Branch Correctional Institution	2	0	1	0	5	0	-2	1	-1	5	-5
PATX Patuxent Institution	16	5	25	19	11	0	-11	20	-6	-8	-11
PHPRU Poplar Hill Pre-Release Unit	10	18	2	0	7	1	8	-16	-2	7	-6
RCI Roxbury Correctional Institution	18	3	3	5	3	2	-15	0	2	-2	-1
SMPRU Southern Maryland Pre-Release Unit	39	33	9	19	26	11	-6	-24	10	7	-15
WCI Western Correctional Institution	14	4	30	10	4	3	-10	26	-20	-6	-1

*Note: 12/13: All JPRU inmates were transferred to the newly opened DRCF (Dorsey Run Correctional Facility)
Data source: <https://data.maryland.gov/Public-Safety/DPSCS-Data-Templates-Directory/rvm2-6rkn>

A paragraph in the 2016 DPSCS budget document suggests the deployment of managed access technology deployment is complementary to other methods such as the recovery of contraband via canine unit searches:

“The department reports the rate of items found per 100 scans conducted by the Canine Unit. Between fiscal 2011 and 2013, the overall rate of contraband finds decreased from 1.34 to 0.42 items per 100 scans. However, the rate of contraband finds increased

*significantly in fiscal 2014, to 0.93 items per 100 scans overall. The majority of items found in fiscal 2014 were weapons and drugs. The department attributes the increased finds to enhanced search techniques and increased use of intelligence and phone monitoring capabilities, which have allowed the Canine Unit to conduct fewer scans leading to an increased number of recoveries. The rate of cell phone finds remained stable in fiscal 2014 at 0.07 per 100 scans. As was to be expected, the rate of cell phone finds declined in the Central Region from 0.33 in fiscal 2013 to 0.13 in fiscal 2014 as a result of implementation of managed access systems at Baltimore facilities*³¹

In addition to the observations noted above, the following conclusions can also be made:

- As noted in the report about the rural system deployed in Parchman MS, good working relationships with nearby cellular carriers is critical. In Baltimore, the system vendor is responsible to maintain this responsibility, and this relationship is enforced in the service contract.
- MAS can effectively be implemented in an urban setting. Technology such as Distributed Antenna Systems (DAS) allows operators to refine and control system coverage within tightly constrained environments.
- DAS deployment is heavily reliant upon physical installation of cable, conduits and other supporting infrastructure. While this can be a challenging and costly task for any pre-existing facility, retrofitting an existing correctional structure is particularly challenging. Deployment of technology in a correctional environment creates unique logistical challenges involved with deploying it in areas where inmates reside and securing the system infrastructure from sabotage.

³¹ See Page 11: <http://mgaleg.maryland.gov/pubs/budgetfiscal/2016fy-budget-docs-operating-Q00Q-DPSCS-Operations.pdf>

Finally, note that cellular devices are becoming more complex and multi-function in nature and, as a result they present an increasing number of threats based on capabilities other than communication via cellular telephony. Cellular managed access technology only addresses cellular communications capabilities and cannot, for instance, prevent use of non-cellular wireless capabilities, such as Wi-Fi, stand-alone computing or photographic capabilities which have become standard features in modern cellular devices. Managed access simply mitigates the connection of cellular radio transmissions between a handset and an external (e.g., commercial) network. Elimination of cellular communications capabilities makes other features present in these devices less useful to the inmates that possess them.

Appendix A: Examples of Contraband Cell Phone Activity

Contraband cell phones have been used for a variety of criminal activities inside and outside correctional facilities. While specific estimates of such activity have not been routinely collected or published, there is significant body of anecdotal evidence that the problem is widespread and continues to pose a public safety problem. Table 2 illustrates some recent examples of alleged or noted criminal activities that have been associated with inmate use of contraband cell phones.

Table 2. Examples of Contraband Cell Phone Criminal Activity

State/ Country	Report	Criminal Act(s) Noted	Inside or outside prison	Reference URL
South Carolina	2010	Murder (attempted)	Outside	http://newsone.com/753345/prisoner-ordered-hit-outside-of-prison-with-smuggled-cell-phone/
Georgia	2011	Organized Inmate Uprisings	Inside	http://www.valdostadailytimes.com/local/x1331361164/Cell-phones-spark-Georgia-prison-unrest
North Carolina	2012	Kidnapping & Harass- ment	Outside	http://www.newsobserver.com/2014/04/11/3776630/kelvin-melton-imprisoned-for-life.html and/or http://www.theguardian.com/world/2014/apr/12/north-carolina-inmate-kidnapping-mobile-phone
Ohio (other locations mentioned)	2012	Multiple	Inside/ Outside	http://www.springfieldnewssun.com/news/news/cell-phones-weapons-and-drugs-flood-ohio-prisons-1/nMySK/
South Carolina	2012	Smuggling, blackmail, harassment	Inside/ Outside	http://www.postandcourier.com/article/20120430/PC16/120439959 and http://www.postandcourier.com/article/20120430/PC16/120439971
Georgia	2013	Planning Violent Robberies	Outside	http://www.wsbtv.com/news/news/local/inmate-accused-planning-violent-crimes-prison/nXbw8/
Georgia	2013	Homicide	Inside	http://chronicle.augusta.com/news/2013-03-24/gangs-cell-phones-blamed-rise-homicides-georgia-prisons
Indiana	2013	Harassment	Outside	http://www.theindychannel.com/news/call-6-investigators/families-victims-targeted-by-indiana-state-prisoners-with-illegal-phones
Tennessee	2013	“violent crimes”	Outside	http://www.newschannel5.com/story/23631961/prisoners-confiscated-cell-phones-help-non-profit

State/ Country	Report	Criminal Act(s) Noted	Inside or outside prison	Reference URL
Georgia	2013	Prison Brawl Video	Inside	http://www.youtube.com/watch?v=C77wyuzh3oM
California	2014	Drug Trafficking & Violent Crime	Outside	http://abc30.com/archive/9531064/
Maryland (Baltimore is men- tioned)	2014	Smuggling etc.	Inside/ Outside	http://www.city-journal.org/2014/24_2_baltimore-correctional-services-corruption.html
Florida (other locations mentioned)	2014	Multiple	Inside/ Outside	http://tbo.com/news/crime/prisoners-use-of-smuggled-cellphones-on-rise-20140216/
Florida, Georgia (and other locations)	2014	Multiple	Inside/ Outside	http://www.nbcnews.com/news/us-news/cell-phones-n327311
Georgia	2015	Extortion	Inside/ Outside	http://chronicle.augusta.com/latest-news/2015-03-31/augusta-man-shown-beaten-leashed-prison-cellphone-photo
<i>International</i>				
Brazil (Baltimore is mentioned)	2014	Murder	Outside	http://www.firstthings.com/web-exclusives/2014/04/prisoners-are-calling-whos-answering
Honduras	2014	Extortion	Outside	http://dialogo-americas.com/en_GB/articles/rmisa/features/regional_news/2014/05/30/honduras-seguridad

Appendix B: Managed Access Technology

Cellular Telephony

The material in this section consists of background information originally included in the unpublished Parchman report. This information is included here as a supplementary technical overview of managed access technology operations.

Cellular telephony, as a wireless radio service, functions much like other radio technologies. Radio technology, when boiled down to bare essentials, involves a process of inserting (modulating) information of various forms onto a radio signal which utilizes radio frequency energy to convey the information through the environment wirelessly. As this wireless energy transits through the atmosphere and surrounding environment some level of radio signal degradation occurs prior to reaching a receiver. This degradation is expected and attributed to a number of predictable and/or unpredictable factors. When the signal arrives at an antenna intact, a receiver converts the information back into a format useful for its intended purpose: this process is called demodulation. Protocols and procedures are used to process (modulate/demodulate) information during wireless transmission, using specific radio frequencies to support the transmission. Some receive processes are based on open standards and others use proprietary technologies. Specific engineering and business needs drive how radio access network (RAN) systems are developed and deployed. For example, commercial carriers Verizon, Sprint, and AT&T each use RAN technologies based on 3GPP LTE standards, but their RAN interfaces are different in many ways, and therefore non-interoperable because of specific implementation choices.

Cellular network operators are authorized via Federal Communications Commission (FCC) licenses to use specific radio spectrum frequencies throughout defined geographical areas.

Licenses are often granted following successful bids levied in a spectrum auction, often at costs to a carrier measured in billions of dollars. In exchange for the proceeds received from winning auction bids, the FCC grants the winning carrier exclusive use of frequencies in defined areas so they can invest in RAN infrastructure in a predictable way to provide customer services in the most optimal way suitable to their business plans. They can do what they want and need to, as long as they do not exceed the technical and regulatory limitations associated with their FCC authorizations. Exclusivity means that commercial carriers retain sole legal access to authorized spectrum; a right that operators defend vigorously.³² Any unauthorized signals emitted in carrier controlled spectrum space are considered to be interference by the carrier and the FCC. Managed access, considered as a category of technology (rather than a specific vendor product) operates as a tenant using carrier RAN frequencies. This spectrum lease process requires close coordination between MAS operators and carriers to ensure systems operate in a legal manner.

For readers who are unfamiliar with wireless cellular technology, it is important to understand that there are constraints related to how wireless systems are designed and how they operate. Subtle details are significant when considered in context of how RAN coverage is established and maintained. Many radio technologies, such as land mobile radios, are designed to operate in relatively quiet and interference/noise-free wireless environments. These radio services are typically designed to function with relatively few high-powered transmitters using antennas mounted atop tall towers to create networks engineered to operate in a relatively uncluttered radio environment. This type of network provides efficient signal coverage

³² There are a number of Federal proceedings underway that are investigating ways to “share” spectrum, with a goal to more efficiently utilize limited spectrum resources. For example, FCC Docket GN 13-185, Regard to Commercial Operations in the 1695-1710 MHz, 1755-1780 MHz, and 2155-2180 MHz bands, is examining approaches to sharing spectrum between commercial and federal users; Docket GN 12-354 is considering commercial operations in the range of 3550-3650 MHz, currently used by federal users.. If these efforts are successful, and commercial carriers are allowed access to new spectrum resources, or other spectrum users are allowed shared access to cellular frequencies, the technical implications facing managed access technology may become very complicated.

throughout an area using the fewest number of network sites and the minimal amount of supporting infrastructure (i.e., additional base stations/repeaters). This type of technology is often referred to as “noise-limited”.

Commercial cellular radio infrastructure can be characterized by a few key distinguishing characteristics:

1. Cellular networks, similar to trunked land mobile radio technology, are bifurcated, composed of a wireless customer air interface between the customer and the carrier network, often referred to as the “radio access network, or RAN”. A second, carrier backbone network, is also established for interconnect cellular towers and to connect customers to off-network services.
2. A typical commercial cellular network is comprised of a relatively large number of base stations designed with relatively low profile towers, densely spaced in a way to efficiently support the greatest number of connections (i.e., users) via the RAN and/or to convey the largest amount of data through the access network. Cellular operators route customer traffic through their network backbone using back-haul connections (e.g., microwave radio, fiber optic cable, copper cable);
3. Cellular technology, similar to land mobile radio, must support customer mobility. Cellular networks are designed to support the movement of large numbers of relatively low-powered user devices between cell towers that make up the RAN, while maintaining network and data connections, and;

4. Cellular RAN's are constructed using a defined set of radio frequencies with a high level of frequency re-use and efficiency (i.e., using the same frequency resources over and over again).

Because of the high level of frequency re-use, cellular technologies are designed to operate amid a relatively high level of radio interference created by adjacent cell sites. This is referred to as an "interference-limited" RF environment, whereby a baseline level of signal interference is expected in exchange for increased levels of spectrum re-use and spectrum efficiency, resulting in the greatest rate of return on a carrier's investment. Cellular base station density varies by business needs and typically mirrors the number of potential cellular customers; thus the number of base stations in an urban setting is typically greater and more densely deployed than the number of base stations in a rural setting where potential rate of return on investment is significantly less.

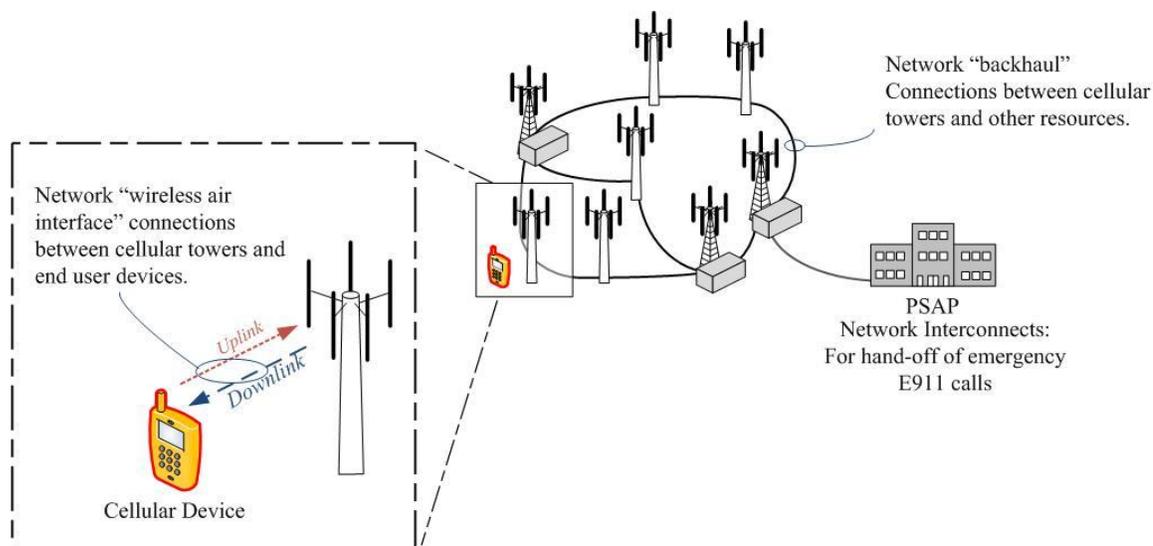
In a cellular environment, as with land mobile radio, wireless transmission occurs in two directions. Cellular transmissions from a base station radio transmitter directed to receiver components within portable cellular device are typically described as "downlink" transmissions. A transmission in the reverse direction, originating from a relatively low-powered end user device (e.g., cell phone) towards a base station receiver, is often referred to as an "uplink" connection. In a cellular network, the constraining wireless link is usually the uplink from a low-powered end-user device. If either the downlink or uplink connection fails, or becomes interrupted, then communications services requested by the cellular device user will not work.

To combat illegal cell phone use, both managed access and jamming technologies rely on highly engineered systems to provide radio frequency signal coverage using cellular network access frequencies. However, there is a significant difference in how this coverage is used is

used. For example, jamming technology disrupts the communications path between the user and the network. Managed access does not, it depends on establishing successful communications between the network and cellular device to capture a wireless device and then use of network control to selectively grant or deny requested network services.

Managed Access

A managed access system is, fundamentally, a cellular network with limited scope and reach. A managed access network is designed to present the “dominant” network signal within its limited authorized RAN coverage area. Managed access networks are designed to operate using the same frequencies and protocols as those used in the RAN of nearby commercial cellular carriers. Cellular devices work by listening for a RAN downlink control signal, interacting with the strongest cell tower, and then attaching to the cellular RAN. A managed access system “intercepts” contraband cell phones by presenting a stronger RAN presence to a cellular device, overwhelming signals from nearby commercial RAN’s. Device to tower communications occurring via the RAN air interface uplink/downlink connections and network core should be further envisioned as providing/having two distinct components: network signaling and customer traffic.



Source: Phil Harris, Engility Corporation

Figure 20. Cellular Radio Access Network

Managed access technology leverages the distinct split between network control and user connection aspects of cellular technology by “managing” network services granted to a specific end user or device. When a cell phone is turned on it initializes its operating system software, searches for and finds a compatible RAN and then connects to the strongest cell tower. Overhead signaling communications processes are used to first “capture” and then direct how the cellular device interacts with the network. This overhead process is used to identify the device, manage how the device interacts with core network resources (i.e., cellular base stations, cell towers, radio frequencies cellular services.)

Signaling transactions between the device and network that pass through the RAN are essentially part of a process used by the network to capture, identify and then verify service levels available to the calling device. Once a device is captured the network can control service provided to the device. Wireless network backbone capacity is typically limited; therefore it is allocated to customers for services on an as-needed basis. The network establishes and then releases network resources as calls, data connection requests, or when inbound received calls are

directed from the network towards/from a specific cellular device. These control communications are often referred to, collectively, as “overhead” communications. Overhead communications associated with network and service management constantly occur and from a resource perspective are typically minimal in comparison to bandwidth required to support user voice or data communications.³³

Phrased differently, a contraband cellular device essentially “roams” onto a managed access system when it is operated in a managed access RAN coverage area. Once connected to the managed access system RAN, it becomes subject to MAS control³⁴. Managed access technology is used to enforce agency policy defining which calls can be completed and which calls are terminated. A managed access system also provides the ability to selectively complete authorized call requests made to/from specific cellular devices, to include emergency calls. MAS operation is guided by facility policies and legal guidelines. In addition to managing the use of contraband cellular devices, managed access systems can be used to capture data about the illegal devices that attach to the system and/or data related to call attempts made from attached devices for investigative purposes.

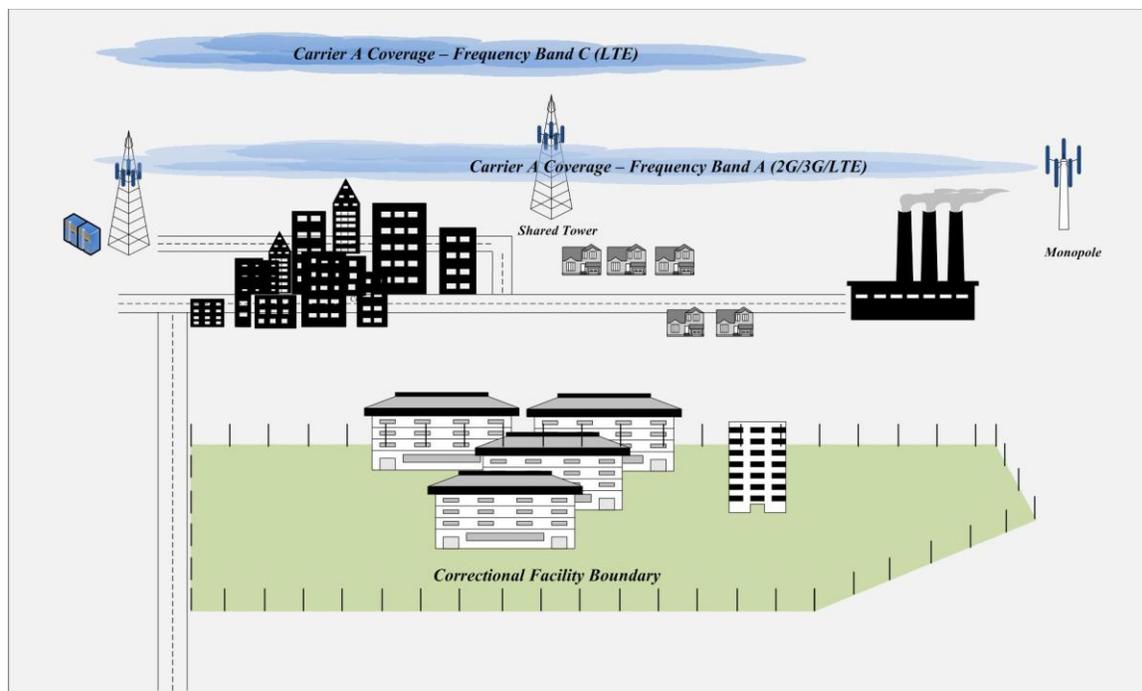
Managed Access Network Coverage

Wireless network signal coverage, envisioned from a simplified conceptual perspective, can be thought of as an invisible cloud of RAN energy that operates at specific radio frequencies. RAN energy within the coverage cloud associated with a network is additive, comprised of

³³ The term Over The Top, or OTT communications described 3rd party services that occur entirely outside of carrier core network resources. OTT communications and OTT overhead are not directly mitigated by managed access, but OTT services are indirectly denied/ blocked when data services are denied by managed access technology.

³⁴ The term “roaming” is used loosely here; managed access systems actually appear to be part of the commercial network by presenting a valid commercial cellular Mobile Network Code to cellular devices. Outbound service requests are explicitly “denied” or “blocked”. Inbound requests are also defeated because the managed access system does not make unauthorized phones visible to the commercial networks; therefore inbound calls to unauthorized phones connected to the managed access network cannot be completed.

overlapping signals emitted from antennas located on adjacent cell towers that operate using the same frequencies. Areas in commercial networks with inadequate signal levels are often described as “coverage holes”³⁵. Transmitter components in a portable/mobile cellular device also emit a similar cloud of radio frequency energy, centered on the current location of the device.



Source: Phil Harris, Engility Corp.

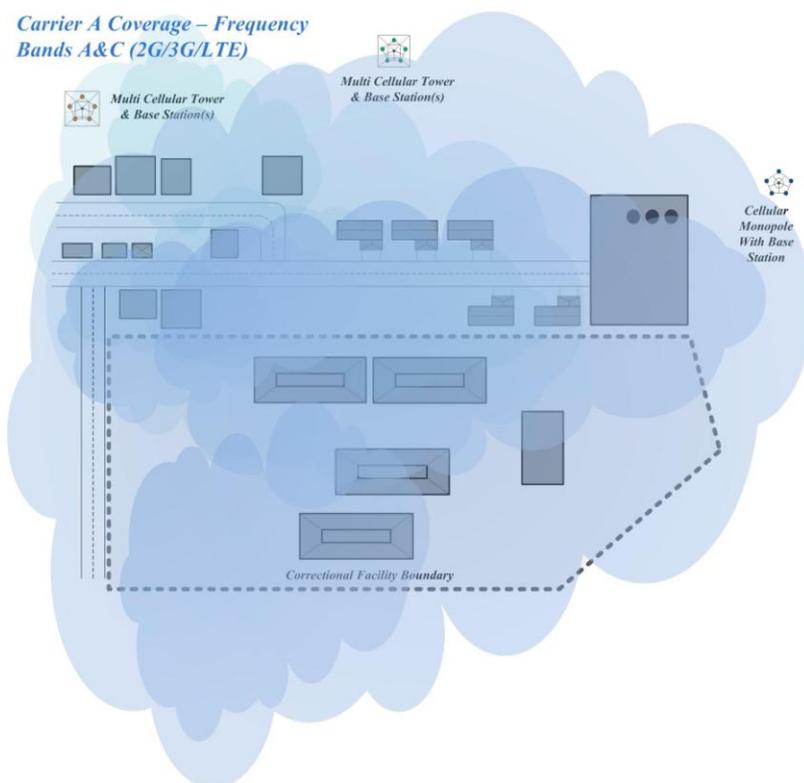
Figure 21. Conceptual View of a Correctional Facility and Nearby Environment

How radio energy propagates through the atmosphere is predictable, with some practical limitations, particularly in highly engineered cellular environments.

Figure 21 depicts a hypothetical correctional facility located adjacent to a town and residential area. At the risk of oversimplification, for the purposes of illustration, RAN signals from competing commercial cellular carriers are depicted using different colors. In this example

³⁵ Note that the term “coverage hole” in context of commercial network coverage describes an area from which calls cannot be completed. A “coverage hole”, in context of a managed access (or jamming) system describes exactly the opposite, an area within the managed access footprint from which connection to a commercial network can be completed. Both describe locations with inadequate signal levels.

“Carrier A” RAN (blue) provides wireless services throughout the town and surrounding areas using two frequencies that including wireless coverage extending throughout the correctional facility. This cellular RAN operates on two different frequency bands (band A and band C, providing differing areas of coverage.) Figure 22 provides a top-down view of the carrier A RAN coverage.

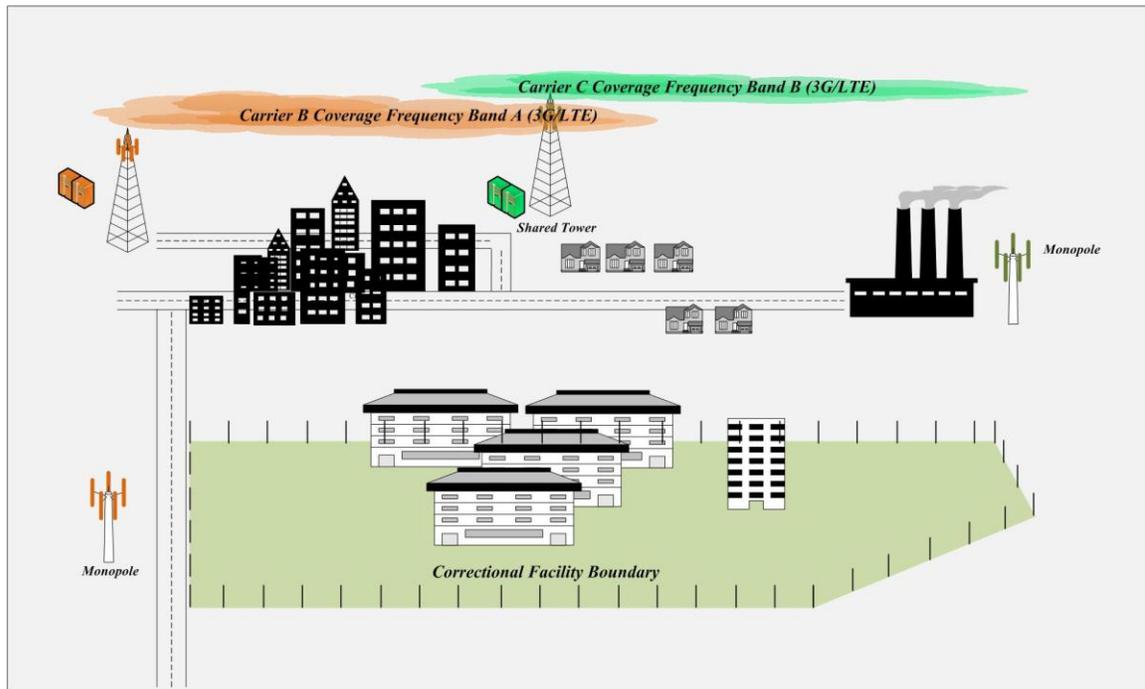


Source: Phil Harris, Engility Corp.

Figure 22. Conceptual Top-Down View of RAN Coverage from Cellular Carrier “A”

To reflect a typical real-world environment two additional, competing RAN networks from carrier B (orange) and carrier C (green) are similarly depicted in Figure 23 and Figure 24. Coverage for each of these three cellular RAN’s partially encompasses the hypothetical correctional facility. Each of these RAN’s designed and deployed to provide signal coverage tailored to the operator’s business model and customer base. Coverage is usually established

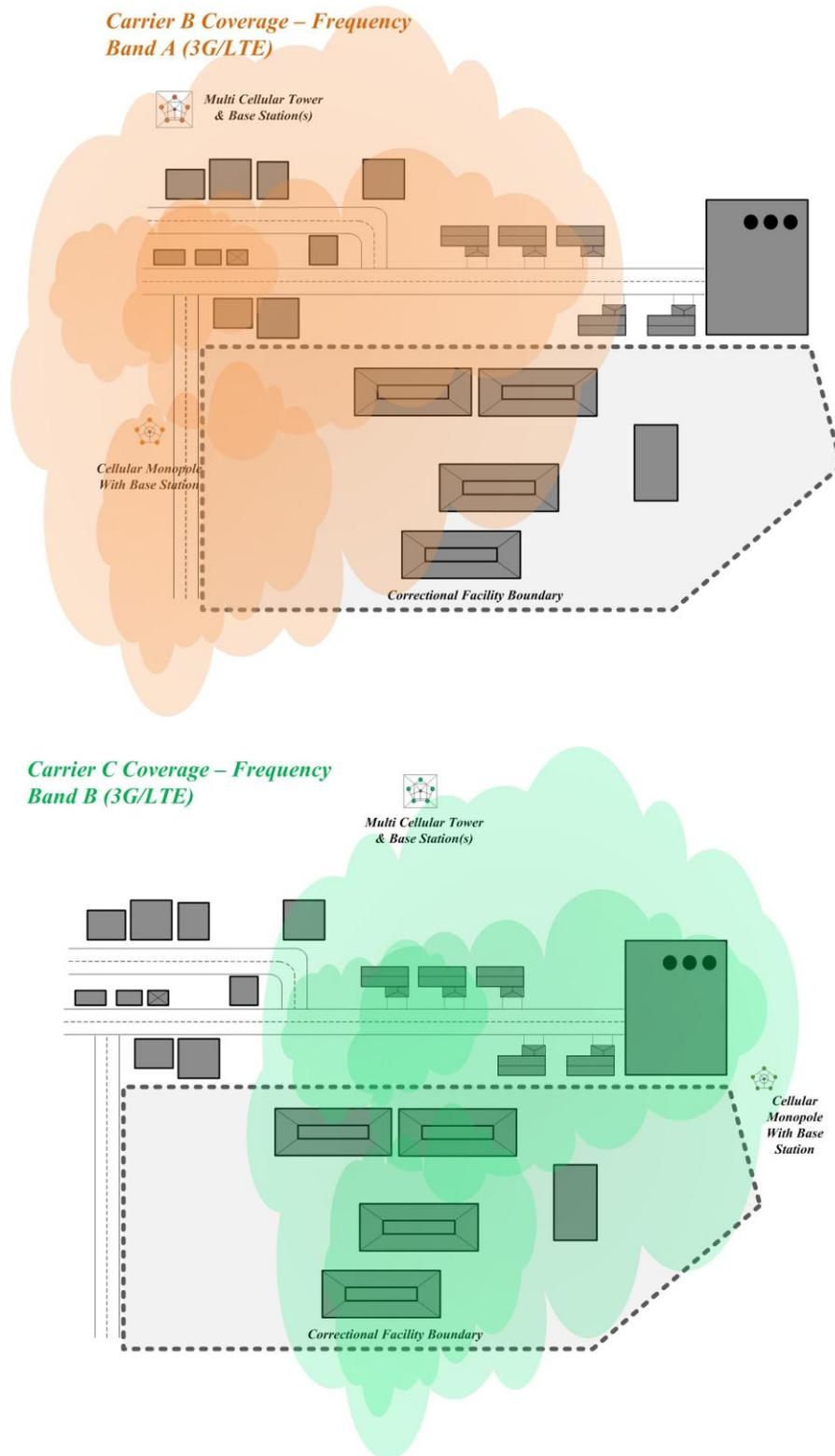
using uplink design criteria associated with a typical portable device performance profile.³⁶ Some level of inter-carrier resource sharing may occur when common network resources are used, or when a tower is leased to two or more competing carriers. Although each network is unique, there is likely to be significant overlap in overall network coverage.



Source: Phil Harris, Engility Corp.

Figure 23. Conceptual View of a Correctional Facility and Carriers “B” and “C”

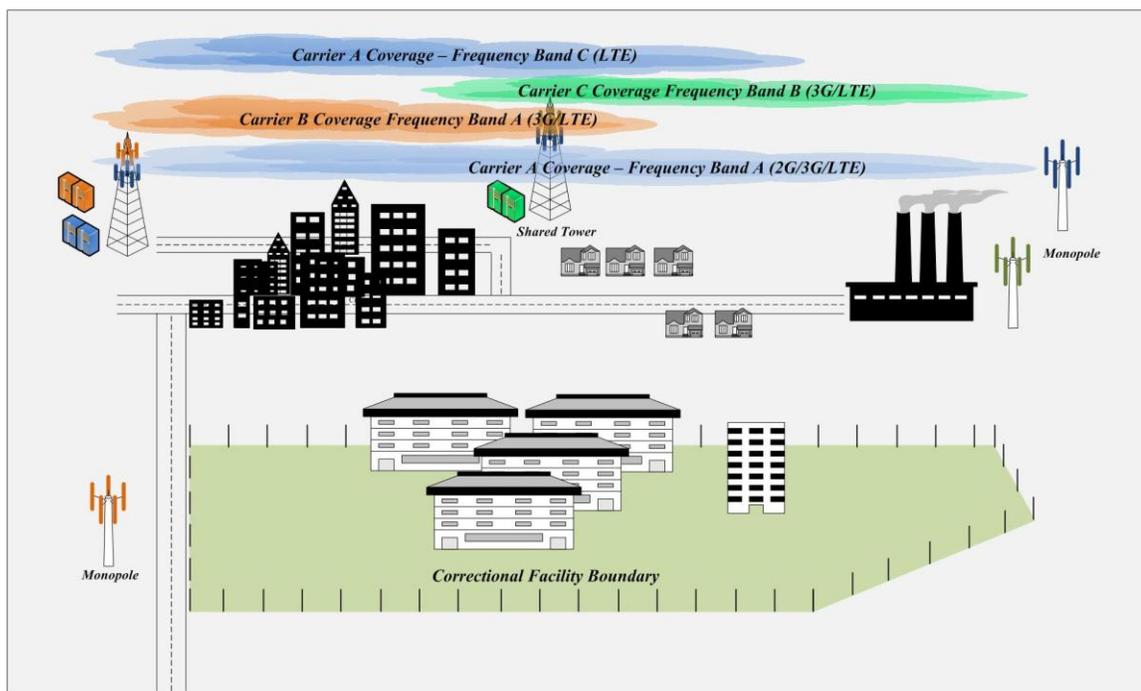
³⁶ Service performance and wireless range in many environments is typically dependent upon relatively weaker uplink transmissions from a cellular device towards the network, particularly from within buildings and in rural settings where cellular network density results in longer wireless links.



Source: Phil Harris, Engility Corp.

Figure 24. Top-Down View of RAN Coverage from Cellular Carriers “B” and “C”

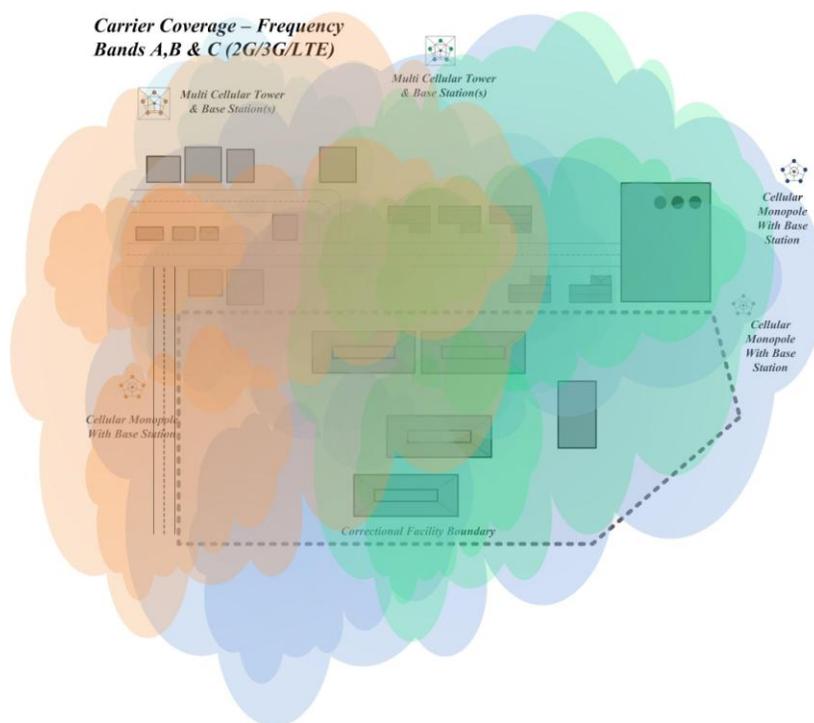
Figure 25 and Figure 26 combine individual carrier views to provide a single view of all three carrier RAN's. They are included to depict the complexity of the entire cellular wireless environment, and how combined cellular carrier RAN coverage overlaps throughout the correctional facility.



Source: Phil Harris, Engility Corp.

Figure 25. Hypothetical Correctional Facility with Carriers “A”, “B” and “C”

It is important to acknowledge, and understand this complexity as a combined threat, because any technology deployed to counteract illegal operation of cellular telephones in a correctional environment must, simultaneously, address the entire combined scope to prevent illegal devices from connecting to each carrier network.



Source: Phil Harris, Engility Corp.

Figure 26. Top-Down View: Signal Coverage: Cellular Carriers “A”, “B” and “C”

It is also important to note that the commercial carrier network environment is not static. Carriers have the freedom to change the topology and makeup of their network to optimize how RAN interface frequencies and other network resources support their business model. Towers/network base stations, and carrier-specific network protocols are all subject to change as the commercial networks evolve. Commercial RAN's are not fully interoperable and each must be addressed separately because of differences in radio frequencies and protocols. For instance, Carrier A and Carrier B may both operate within the same frequency band, yet customer devices may not be interoperable with both networks because they have licensed and use different sub-allocations within the band. Carrier network changes lead to changes in how cellular customer devices operate, and which uplink/downlink frequencies and/or protocols are used in the RAN to support services. RAN coverage will change over time as well because cellular operators continually optimize their networks. Because of this, technology used to counteract the illegal

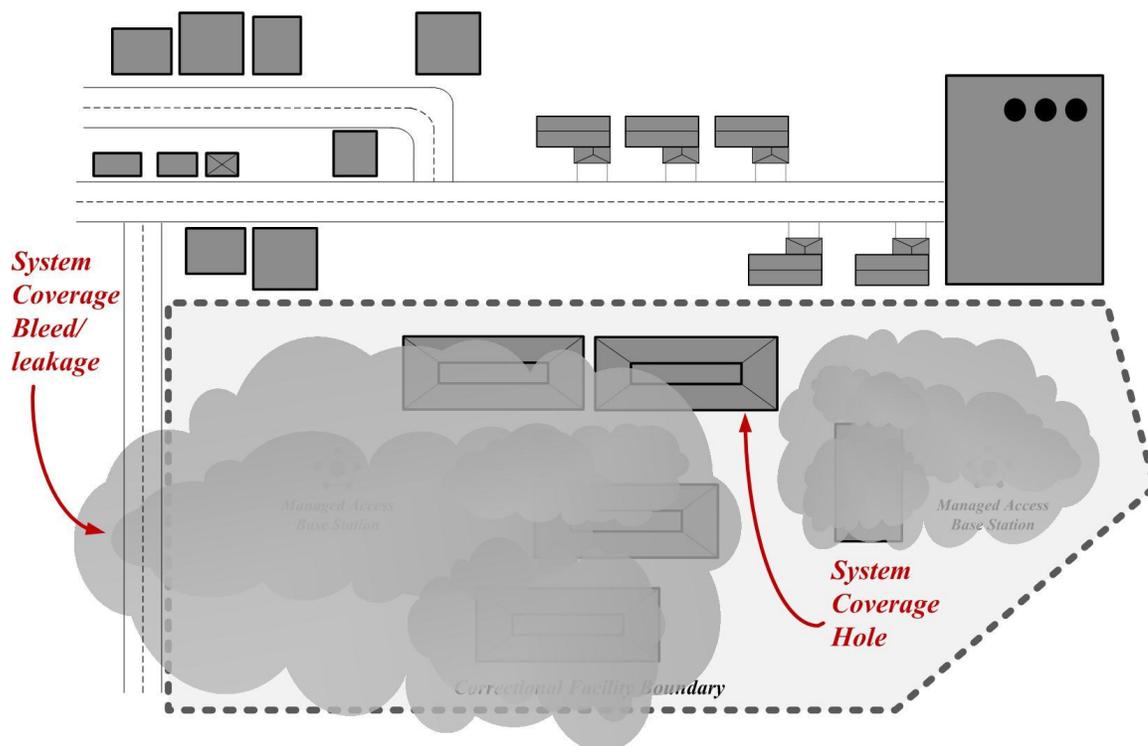
use of cellular devices must also be adapted to ensure ongoing effectiveness. A correctional entity operating a MAS or consuming services provided via a leased MAS must ensure that adaptations to counter carrier network changes are handled in a pro-active manner in response to changes or the system will not retain its effectiveness as the surrounding cellular environment evolves and new end-user devices are introduced. Design, deployment, and operation of a managed access system is not a one-time event, it requires ongoing optimization and capability assessment in response to the surrounding environment.

Network Coverage Related Maintenance

Managed access operational conditions are defined within cellular spectrum leases: coverage must not extend beyond a well-defined service perimeter. System coverage changes can have significant impact on effectiveness if RAN coverage holes are created within a correctional facility. RAN coverage holes can allow users to bypass the managed access system and access commercial networks. Conversely, RAN signal leakage that extends beyond the agreed upon managed access coverage area will lead to disruption of legitimate cellular users in areas where the managed access signal strength overwhelms RAN coverage from a commercial cellular system operator. From a legal perspective compliance with coverage limits defined by a spectrum lease must be addressed first, followed by operational effectiveness within that coverage area. Effectiveness is an internal performance issue, unrelated to spectrum lease conditions.

RAN coverage outside the authorized footprint (a.k.a. leakage/bleed) can lead to FCC enforcement action and/or complaints and public relation issues. Coverage issues must be addressed as part of ongoing system maintenance. As previously noted, RAN coverage changes may occur as a by-product of change within nearby cellular networks, or new capabilities

introduced in commercial networks operated in areas adjacent to the correctional facility. For instance, a new commercial tower installation or a change in commercial network parameters (such as addition of a new band or protocol) can directly affect managed access system coverage³⁷.



Source: Phil Harris, Engility Corp.

Figure 27. Managed Access System Coverage Hole

Coverage issues may also result from RAN infrastructure damage to either the commercial network or to the managed access system. Coverage issues may result from damage due to inclement weather or from component failure. Any change that affects the relative balance between the strength of managed access and nearby commercial network signal strengths must be resolved.

³⁷ A managed access system design, to include carrier-specific MAS antenna placement, needs to address and optimize coverage for each carrier's frequencies; especially if the towers are not co-located or there are different deployment scenarios and each carrier transmits at different power levels.

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A Case Study of Mississippi State Penitentiary's Managed Access Technology

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Executive Summary

Contraband cell phone use in a corrections facility is an ongoing challenge for corrections agencies. There are numerous anecdotes of contraband cell phones being used to conduct criminal activities from inside a prison. Physical searches of inmates and correctional staff are limited in their scope; contraband policies and legal punishments possess deterrent value, but the effect of such approaches are not well known; and technologies to jam cell phone signals are in violation of U.S. law¹ and Federal Communication Commission (FCC) regulations. Recently, managed access technology has emerged as another approach to affect contraband cell phone use. This technology allows completion of authorized calls placed from approved phone numbers (numbers which have been vetted and entered into a database) while, conversely blocking calls to/from devices or numbers which have not been pre-approved; a process often referred to as “white-listing”. The promise of this technology as an effective means to combat contraband cell phones has influenced correctional procurement decisions across the country. Yet, many unknowns exist with respect to its capability, functionality, and actual impact on contraband cell phone use.

The present research seeks to inform these gaps and provide corrections administrators and policy-makers with information describing managed access technology, its deployment, and relevant data on cell phone transmissions captured by a managed access system. A case study approach was used to learn about the Mississippi Department of Corrections’ (MDOC) procurement and deployment processes used when they implemented managed access technology at the Mississippi State Penitentiary (MSP). A series of interviews and

¹ **47 U.S. Code § 333:** No person shall willfully or maliciously interfere with or cause interference to any radio communications of any station licensed or authorized by or under this chapter or operated by the United States Government.

teleconferences, in addition to the secondary analysis of managed access system data, were employed to generate a fundamental understanding of managed access technology operations, identify challenges and lessons learned, and develop a baseline of contraband cell phone activity. This assessment is not an evaluation of the operational efficacy of managed access technology. More specifically, the present study does not seek to quantify potential vulnerabilities or manipulations of managed access systems. Such an evaluation would be insightful, but is beyond the scope of the present study.

The present study identified the following challenges associated with deployment and operations of managed access technology:

1. Managed access has to be routinely “managed”. This task requires a significant labor commitment from the host agency, in addition to ensuring that personnel have appropriate technical skills.
2. Managed access requires an effective self-monitoring capability.
3. The system must be designed to prevent illegal access to cellular signals originating outside the corrections facility, and procedures must be developed to address legitimate calls that are blocked by the system.
4. The signal strength of managed access system must be strong enough to cover areas in the facility while ensuring emissions do not exceed authorized levels or exceed authorized coverage areas.
5. Coordination is required with carriers and local public safety answering points to ensure proper handling of 9-1-1 calls.
6. Technology upgrades by cellular carriers can significantly reduce system effectiveness; close coordination with the carriers is critical for effective system operations.
7. The managed access system and associated physical infrastructure may be vulnerable to weather conditions.
8. Inmates may attempt to sabotage system infrastructure.

To address these challenges, and based on our observations, we note the following practices employed by MDOC:

1. Work with and educate representatives from the legislative community, the Executive Branch, and advocacy groups to advocate changes to existing laws and policies governing contraband cell phones.

2. Establish cooperative partnerships with cellular carriers.
3. Cross-reference captured phone call information with existing pre-approved list of inmate land-line numbers.
4. Treat managed access as part of a layered approach for counter-measures beyond traditional search capabilities.
5. Use managed access to eliminate inmate use of cellphone technology as a way to circumvent mandatory monitoring of inmate conversations, a condition of use associated with landline based authorized Inmate Calling Systems (ICS).
6. Use managed access to create a general deterrent to impact contraband cell phone market value.
7. Create a housing unit for contraband cell phone violators within MSP at Parchman.
8. Correctional facilities must harden managed access system hardware and associated infrastructure to prevent damage, system failure, and system inefficiencies from both inclement weather and premediated attacks by prisoners.

Despite these challenges, managed access technology does appear to detect and terminate a large number of cell phone transmissions. Our analysis of contraband cell phone activity data captured by MSP's managed access system and provided by MDOC for a five month period in 2012 yielded several useful insights related to the detection and termination of cell phone transmissions.

1. Not all blocked calls can be assumed to originate from contraband cell phones; any cell or wireless phone not on an approved caller list will be blocked by the managed access system operating at MSP.
2. A number of dial strings were identified during our analysis that did not correspond to telephone numbers associated with voice calls but instead represented system commands (e.g., #777, #768 etc.) associated with data services or phone configuration. These likely originated from contraband devices with CDMA² data capabilities that automatically query the network when turned on. An agency implementing a managed access system may derive additional information by analyzing captured managed access data resources,

² CDMA stands for Code-Division Multiple Access, a digital cellular technology. Tier one carriers Verizon and Sprint use CDMA technology in their 2G & 3G networks. Alternatively, AT&T and T-mobile use technology based on GSM (or Global System for Mobile) standards for their 2G/3G networks. These technologies, and their derivatives, are not interoperable. In addition to the tier-one carriers mentioned, there are approximately 50 regional CDMA and 70 GSM based regional carriers in the United States. An anecdotal but representative list of carriers can be found at <http://www.ebay.com/gds/GSM-and-CDMA-Guide-/1000000009189079/g.html> or <http://www.unlockedshop.com/a-full-list-of-gsm-carriers-in-the-usa/> for a more comprehensive list of carriers. Note that these listings are subject to ongoing changes in the marketplace, in addition to interpretation by website authors, so they should be considered representative, but not authoritative sources.

a process that will require analysis of database content to determine context associated with a specific dial string (which may require additional information from carriers or other vendors). This finding also has implications for agencies in determining policies for managing the approved list.

3. While many unique device identification numbers were detected only once, some device identification numbers were detected over 1,000 times by the system over a period of months. This could indicate that even after a device has been captured by the managed access system, repeated call attempts originating from the same device and number are persistent, a condition which may indicate that inmates are probing to determine if the managed access system is not operating, or down for maintenance.
4. Patterns in call attempt data suggest that a significant amount of call activity was for the purpose of social contact. Increased transmissions were detected by the managed access system on specific days such as Mother's Day and federal or state holidays. Data on the patterns of call activity could not be used to identify or determine the frequency of transmissions to coordinate illegal activities.
5. The vast majority of documented/registered/captured contraband cell phone call attempts were voice calls (91%); the remaining 9% were texts.
6. The top-ten most commonly called numbers from inmates included cellular provider customer service lines, voicemail accounts, pay-as-you-go debit card companies, and a municipal library storyline for children. Most text messages were sent to private individuals.
7. Lastly, despite MSP personnel seizing slightly more contraband cell phones found in inmates' possession at Parchman compared to other MDOC facilities, fewer cases of contraband cell phone possession were forwarded to the District Attorney for prosecution that led to pending grand juries.

Limitations and assumptions for this report are provided in the concluding sections.

Introduction

Background and Context

Cell phone accessibility in the United States has been increasing significantly, due to a combination of lower cost technology and pre-paid plans. A recent report by the Pew Research Center (2014) estimates 90 percent of American adults currently own a cell phone. This trend is mirrored in correctional facilities nationwide as cell phones have emerged as one of the most prevalent forms of contraband within prisons (Burke and Owen, 2010; Worley and Cheeseman, 2006). As with any contraband in correctional facilities, true estimates of the problem are elusive. Recent spikes in the number of cell phones confiscated within correctional facilities have shed some light on the scope of the problem. For example, California Department of Corrections and Rehabilitation reported an increase of confiscated phones, from 900 in 2007 to 10,700 in 2010 (U.S. Government Accountability Office, 2011). Increasingly, cell phones are being confiscated in more secure facilities (U.S. Government Accountability Office, 2011)

The urgency to address contraband cell phones is driven in part by stories of violence and crime that are connected to inmate use of contraband cell phones in prison (see Appendix A). One such example is the attempted murder of Robert Johnson, the former captain in charge of finding contraband at the Lee Correctional Facility in Bishopville, South Carolina, where an inmate used a contraband cell phone to coordinate the attempted murder (CorrectionsOne, 2015). Gary Maynard, Secretary, Maryland Department of Public Safety and Correctional Service, summarized the complexity of the problem at a conference panel sponsored by NIJ (2010):

When I first came here in January of 2007, the U.S. Attorney was investigating a homicide that occurred on the streets of Baltimore from a witness who was testifying in a criminal trial, and it was believed that that hit was called for by a Black Guerilla Family gang leader in a prison in Hagerstown, Maryland. That investigation did, in fact, conclude that that hit was called for. During that investigation, we found a lot of testimony that indicated that cell phones were being used for intimidation, drug

distribution and many other criminal activities within the prison. We really have to target cell phones. The more we target cell phones, the more we learn about gang affiliations; the more we target the gangs, the more we find about cell phones. So they are intimately entwined in each other.

There are also ongoing Federal Communications Commission (FCC) activities and public debate on the cost of landline phones in prisons³. Contraband cell phones have emerged, in part, as a lower cost alternative to available landline phone plans. While recognizing that the factors that motivate contraband cell phone use are an open question and a relevant topic for future research, the focus of this study is the deployment of managed access technology to reduce contraband cell phone use.

Current methods to combat contraband cell phone use in correctional facilities rely on a combination of searches, sanctions, and technologies. Physical searches of inmates and correctional staff to find and confiscate contraband phones are limited in scope and often generate mixed results. The physical size of modern cell phones make them easier to conceal and they can be transported into the facility not only by people entering the facility but also as simply as being projected over a facility fence or wall. Contraband policies and legal punishments are implemented as a deterrent, but understanding their effectiveness is anecdotal and subject to interpretation. The number of technology based methods currently available to combat contraband cell phone use in correctional facilities is currently limited by regulatory and technology issues, as well as fiscal constraints, that create uncertainty in the decision-making process when choosing to deploy these systems. All forms of communications signal jamming, including the jamming of cellular communications within non-Federal jails and prisons, remains

³ As this report was written FCC review of ICS (Inmate Calling Services) was underway. The FCC conducted a workshop in July 2014 regarding reform of inmate calling services. In September 2013 the Commission issued a Report and Order and Further Notice of Proposed Rulemaking in Docket WC 12-375 regarding rates of inmate calling services, and released a Second Further Notice of Proposed Rulemaking in that proceeding on October 22, 2014. For more information, see <http://www.fcc.gov/document/fcc-continues-push-rein-high-cost-inmate-calling-0> and <http://apps.fcc.gov/ecfs/comment/view?id=6017468678>.

illegal by way of Federal law as outlined in the Communications Act of 1934 and other FCC rules (see FCC Jamming, n.d., and FCC 2005)⁴. Alternative methods currently used to address illegal cell phone use, such as phone-sniffing dogs and random cell searches, even when supplemented by detection technology are labor-intensive and typically yield less-than optimal results (U.S. Government Accountability Office, 2011).

Recently, a technology has emerged known as managed access. Managed access technology leverages core aspects of cellular technology by “managing” network services granted to a specific cellular user or cellular device. As with jamming technology, managed access technology actively transmits radio signals in many bands commonly used by commercial wireless providers⁵. Use of these bands is closely regulated by the FCC or NTIA⁶. In comparison, jamming technology simply disrupts *all* network communications denying service to all users⁷. Radio sensing technology is a passive alternative (i.e., receive-only technology does not require FCC authorization) in that it simply recognizes the presence of an active wireless uplink or downlink connection and then alerts the operator of its presence. As will be discussed in more detail to follow, managed access technology permits connections to/from approved phone numbers while intercepting and blocking call and other connection activity

⁴ Federal agency authorization to use radio spectrum is not regulated by the FCC. Federal entities fall under the authorization of the National Telecommunications and Information Administration (NTIA). It is possible for federal agencies to request authorization to deploy and use cellular jamming technology via NTIA processes. The extent to which jamming technology has been authorized and deployed in Federal correctional facilities is unclear.

⁵ Including bands associated with the Cellular Service, Broadband Personal Communications Service and certain Advanced Wireless Services.

⁶ Note that the terms “active” and “passive”, in context of regulatory and licensing discussion in this paper, describe technologies that actively transmit radio energy in commercial mobile service bands (active) or function as receive-only in these bands (passive). This is in contrast to use that describes operational use that “passively” disables the use of cellphones from a distance versus those that simply locate and then require “active” intervention on behalf of prison personnel to physically seize illegal devices. Both uses appear in this paper.

⁷ The Communications Act of 1934, Section 333 - prohibits willful or malicious interference with the radio communications of any station licensed or authorized under the Act or operated by the U.S. Government (47 U.S.C. § 333). It is a violation of federal law to use a cell jammer or similar devices that intentionally block, jam, or interfere with authorized radio communications such as cell phones, police radar, GPS, and Wi-Fi, see <http://www.fcc.gov/encyclopedia/jamming-cell-phones-and-gps-equipment-against-law>

associated with non-approved, and presumably contraband, cell phones.⁸ Managed access technology is one option to combat contraband cell phones, yet many unknowns exist with respect to its function, capabilities, and potential impact.

Purpose of the Technology Assessment

Given that managed access has been identified as a method to help control contraband cell phone use in correctional facilities, and corrections agencies have started to procure such systems, the purpose of this research is to provide objective, data-based information to inform procurement decisions. With this in mind, this study seeks to fulfill the following nine objectives:

1. Explain what managed access is and how it works;
2. Document the experience of the Mississippi State Penitentiary (MSP) with contraband cell phones and attempts to combat the problem;
3. Explain how managed access was installed and operates within the MSP;
4. Provide an empirical illustration of contraband cell phone use at the MSP;
5. Provide an empirical illustration of the effect managed access has on contraband cell phone use at the MSP;
6. Identify operational challenges of the managed access system in the MSP;
7. Identify lessons learned from MSP that facilitate managed access effectiveness;
8. Draw conclusions for policymakers based on available data and information gleaned from interviews; and
9. Provide guidance for future research on contraband cell phones and managed access.

Evolution of the Contraband Cell Phone Problem

Cellular Telephony and Services

There are currently four major nationwide carriers in the United States (AT&T Inc., Sprint Corp., T-Mobile USA, and Verizon Wireless), with some areas also served by unaffiliated

⁸ We use the terms “call” and “connection” in this document interchangeably to describe a request for service placed from a cell phone. This service may be voice service, messaging services (text/email/multimedia) and/or Internet services that can be obtained from a contraband wireless device.

regional carriers.⁹ Network operators use a small number of standard, but typically customized, wireless air interfaces, supported by a rapidly evolving technology base that drives a continuous cycle of system technology upgrades. Cellular services, in addition to basic telephony, include access to the Internet, and capabilities for users to communicate using text messages, video, images, sound files, and email.

Cellular telephony services and wireless data connectivity are provided by the wireless industry to end users through various types of contract mechanisms. For the purposes of this report, these mechanisms are grouped into two broad categories: post-paid and pre-paid contracts. Post-paid mechanisms typically consist of long-term contracts, of various types. In a typical consumer post-paid arrangement, cellular device cost is subsidized by the carrier. Monthly fees typically include a specific line item associated with the purchase cost of a specific cellular device, plus fees associated with basic wireless service and service options across monthly or multi-year contractual service agreements. Post-paid contractual information includes data associated with a well-known user, a specific wireless device, and a specific telephone number.

In contrast to services obtained via post-paid service agreements, pre-paid cellular encompasses a category of cellular services that are independent of constraints associated with typical long term contracts. Pre-paid service is often competitive with, or available at a lower cost than post-paid services, resulting in a rapid increase in utilization of such accounts.¹⁰ Pre-paid service is available bundled with pre-packaged, off-the-shelf devices using the latest

⁹ An anecdotal but representative list of carriers can be found at: <http://www.ebay.com/gds/GSM-and-CDMA-Guide-/1000000009189079/g.html> or <http://www.unlockedshop.com/a-full-list-of-gsm-carriers-in-the-usa/> for a more comprehensive list of carriers. Note that these listings are subject to ongoing changes in the marketplace, in addition to interpretation by website authors, so they should be considered representative, but not authoritative sources.

¹⁰ For more information see <http://phys.org/news/2013-02-cellphone-users-prepaid.html>

technology that can be user-activated without direct carrier interaction or a long-term service contract. Most importantly, for the context of this report, many inexpensive pre-paid devices can be activated over the Internet, anonymously, or with the use of false credentials. In a U.S. General Accounting Office (2011) report describing the use of illegal cell phones in Federal Bureau of Prisons (BOP) facilities, correctional officials noted the availability of less expensive cell phones as being a major challenge to the detection and confiscation of contraband cell phones.

Technology to Actively Manage Illegal Cell Phone Use

The National Governors' Association Center for Best Practices (2009) published a background paper outlining a number of approaches that are being taken by states to address the challenge of contraband cell phones, including detection, signal blocking, and punishment. The Department of Commerce (2010) published a study summarizing the results of a Notice of Inquiry into technologies to combat contraband cell phone use. Solutions proposed by industry to defeat the illegal use of cellular telephones included: technology to detect and locate contraband cell phones; radio frequency jamming technology and network-based capabilities that facilitate targeting and disabling of specific cellular devices; a subset which includes "kill switches" and managed access technology. In this section, we summarize these technologies in more detail, with emphasis on managed access technology.

As this report was written, nationwide institutional corrections community efforts underway to address the issue of illegal cell phone use were focused on changes to regulations that authorize (or prohibit) the use of technologies that actively disrupt operation of illegal cell phones in correctional facilities. These regulations are the subject of an ongoing FCC

proceeding (see FCC 13-58, 2013). FCC considerations include the potential establishment of guidelines, processes and timelines associated with spectrum lease agreements typically between wireless carriers and managed access system owner/operator. A common theme with each of the technologies under review by the FCC is the capability to remotely render cellular service ineffective through service denial, minimizing the utility of possessing an illegal device for prisoners¹¹. This may simultaneously decrease the number of risks associated with personnel enforcing the rules through physical search while simultaneously increasing the risk taken by the smugglers who bring these illegal devices into a correctional facility. Detailed descriptions of ongoing regulatory activities are beyond the scope of this report because they have not concluded and the outcome of these proceedings remained uncertain at the time this report was authored.

Another significant FCC proceeding (FCC, 2012) established regulations associated with calling rate structures and regulations that define the rates correctional facility operators are allowed to charge for use of inmate landline calling services. As part of an FCC-sponsored workshop on the topic (FCC, 2010), correctional representatives testified that landline service revenues provide funding resources for programs used to counter illegal cell phone to include deployment of technology, in addition to revenues associated with inmate program support. Mississippi's Department of Corrections Commissioner noted: "...by them not using the landlines that we have done the best math we can and we feel like it is a couple million dollars. And those funds in my state, if I don't capture those, then I have to use taxpayer dollars to provide the teachers, the counselors, et cetera."

¹¹ With the advent of smartphone technology many devices can be used as standalone computing devices, cameras, or used with non-cellular radio technology (i.e., Wi-Fi or Bluetooth) for other limited wireless use. The FCC regulates aspects of these devices that relate to radio emissions and equipment authorization. FCC responsibility does not extend to how these devices are used for other purposes. Use of alternate wireless modes (Wi-Fi/Bluetooth) is not specifically addressed in this report.

Passive Sensing Technology

Unlike technology that actively emits, or transmits, a signal in the cellular radio bands, sensing-only technology represents a category of passive technologies (passive in context of *not* transmitting on “carrier-licensed” cellular frequencies.) Passive technology includes FCC authorized, and legally operated, unlicensed technology that supports physical detection of illegal devices. There is more than one type of sensing technology; metal detectors, magnetometers, x-ray technology, ferromagnetic detection, and nonlinear junction detection devices transmit on non-cellular frequencies to discover and locate electronic components in cell phones. RF signal detection is a listen-only sensing technology that employs radio receivers designed to listen to cellular frequencies and sense the presence of cell phone transmissions and/or determine the location of an active cellular device. These products are collectively “passive” with respect to licensed cellular frequency bands because in comparison alternative active technologies such as jamming and managed access are designed to actively transmit RF energy in carrier-licensed cellular bands, therefore they have significant regulatory and spectrum leasing implications. Unlike the technologies that actively disrupt cellular communications, users employing unlicensed passive sensing technology do not require specific prior FCC licensing, or cellular carrier spectrum leases.¹² Manufacturers of unlicensed equipment obtain FCC authorization for all products prior to sale.

Sensing technologies provide tools to assist with enforcement. Unlike technologies that effectively disable the ability to place voice calls or obtain other cellular data services from illegal cellular devices from a distance, sensing technology requires direct intervention by correctional staff to physically locate, confiscate, deny use of, or and analyze illegal devices.

¹² To clarify, active sensing or detection-only technology also exists. These devices actively ping contraband devices to obtain identifying information. These pings are active emissions and therefore these systems are subject to FCC licensing and, like managed access technology, require carrier spectrum lease agreements.

Institutions that use managed access technology typically use it alongside a combination of passive technology based tools to minimize the number of devices successfully smuggled into a correctional facility by screening visitors and employees as they enter a facility. The deployment and use of managed access technology in a real-world correctional setting is the focus of this report.

Jamming Technology

Jamming technology employs active transmitters that emit radio energy on cellular network frequencies; energy designed to disrupt all communication processes between network infrastructure and cellular devices. Jamming system signals used for this purpose need to be sufficiently strong enough to essentially “mask”, or overwhelm, key components of wireless signals associated with nearby cellular networks. Jamming signals are indiscriminant, meaning that they disrupt all communications, including 911 calls, not just calls associated with specific devices or telephone numbers. As with managed access, poorly implemented jamming technologies are often strong enough to disrupt signals from nearby legitimate commercial network customers including public safety radios operating on nearby frequencies.

Deployment of this technology to combat illegal cellular phones involves detailed engineering design of a system tailored to each correctional facility as part of an implementation process. Inevitably, as with any wireless technology, there are variations in how jamming systems are implemented, and deployment specifics are highly dependent on the environment and specific jamming target. The end result is a blunt-force tool used to disable all cellular radio signals used for network connections. As noted above, current FCC policy is to consider all forms of radio frequency jamming to be illegal, including the use of jamming to counteract illegal cell phone use in correctional settings.

Network-based Technology: The Kill Switch

Network-based technology can facilitate targeting, and disabling, of specific cellular devices (i.e., activate a “kill switch”). A kill switch capability requires a two part solution; installation of intelligence into carrier network infrastructure alongside use of a “kill switch” function installed in all cellular devices sold in the United States. As with managed access this process relies on the success of processes to identify, capture and then ultimately deny the ability of a device to complete calls through a carrier’s network. In current FCC proceedings (FCC, 2013), the cellular industry suggests that a kill-switch capability, developed primarily to protect consumers and combat the growing problem of stolen phones, should be a voluntary or opt-in technology^{13,14}. This opt-in approach would obviously not work to combat illegal cell phone use in correctional facilities. Technical changes associated with kill switch capabilities need to be accompanied by closely coordinated policy and procedures that outline how correctional personnel can legally request, process, and then disable specific cellular devices; a complex process with unknown costs for all entities involved.

Ongoing debate in regard to policy and business issues associated with the use of both jamming and “kill switch” alternatives appear to be more challenging than underlying technical issues. The kill switch alternative would not require the installation of any active infrastructure at

¹³ This kind of blocking technology is employed today by cellular carriers as an optional service to disable lost/stolen phones: For example, see <http://newsroom.sprint.com/blogs/sprint-perspectives/sprint--at-the-front-lines-against-phone-traffickers.htm>

¹⁴ In August 2014, California passed a law to require a kill switch in new smartphones. The law was created to address the increasing problem of stolen smartphones; it is not designed to address correctional issues. Kill-switch processes would need to be further revised to address correctional enforcement needs. Considered in context of correctional issues, if the kill switch function defined in the CA legislation is activated by default in all new handsets, is likely that it would simply be turned off/disabled before a phone is smuggled into a prison. The CA law does not apply to feature phones, and the law verbiage specifies that it only applies to smartphones based on LTE and/or successor technologies, meaning that 3G smartphones using non-LTE technology are likely exempt. It also does not apply to second-hand phones. There are several aspects of the California law that limit its utility to addressing the correctional problem. See: http://www.leginfo.ca.gov/pub/13-14/bill/sen/sb_0951-1000/sb_962_bill_20140812_enrolled.pdf

a correctional facility, instead requiring use of passive monitoring technology to assist in obtaining key information for identification and targeting of specific illegal cell phones.

Network-based Technology: Managed Access

Managed access, a term used here to describe a category of technology rather than a specific product, is an active technology. The FCC indicates that managed access products are in service, or authorized, in California, South Carolina, Texas, Maryland and Mississippi (see FCC NPRM 13-58 page 6, 2013). This technology is being deployed because, unlike jamming alternatives, it can be used within the bounds of current regulatory structure. Many aspects related to its implementation are currently under regulatory review to determine legal definitions, funding, specifications for deployment, adherence to cellular network spectrum lease issues, and carrier obligations related to ongoing changes in their networks. All of these decisions will affect managed access deployment and maintenance procedures.

To gauge the complexities of managed access from the perspective of network carriers, the Department of Commerce (2010) engaged cellular providers to assess their perceptions of managed access technology. A sample of the informative viewpoints is provided below:

“Prohibiting access to the commercial cellular networks would solve 90-95 percent of all illegal communications within a prison...Verizon Wireless mentions that a managed access system can prevent phones from switching to other bands and would not need to intercept as many spectrum bands within prisons” (p. 20).

“T-Mobile USA reinforces the effectiveness of a managed access solution in protecting public safety spectrum...a managed access system will provide more precise control over the bands selected for disruption, thus preventing interference with public safety wireless communication ...unexpected interference to other services is reduced” (p. 21).

“The wireless providers – AT&T, Verizon Wireless, Sprint Nextel, and T-Mobile USA – all respond in favor of a managed access solution. This is due in large part to the system’s ability to allow public safety, 9-1-1, and authorized calls to reach the cellular networks” (p. 21).

“Verizon Wireless states that managed access can allow the system operator to maintain a list of approved callers – a list that can be amended constantly as subscribers that live, work, or frequently visit areas near the prison and are captured by the system are identified – whose calls will be allowed to [be] completed rather than blocked. Managed access systems allow prison officials, working with the system operator and nearby licensees, to set the parameters of how captured calls are handled. For example, prison officials can decide to allow the first call from a device not on the approved list to be completed, but block subsequent calls in order to prevent blocking calls from random subscribers near the prison, can decide to limit the duration of calls from non-approved callers, or can deliver a message to non-approved callers letting them know their call is being blocked by the prison system and advising them to move away from the prison to try again” (p. 22).

Anecdotal support, such as that noted above, is the only readily available currency upon which managed access can be evaluated by correctional officials who serve as potential consumers. This lack of reliable information is a result of the technology’s recent emergence. Perhaps the most informed and well-articulated assessment of managed access to date is California Council on Science and Technology (CCST) (2012) report. This research was driven by California Department of Corrections and Rehabilitation’s interest in a managed access system to combat cell phone problems in their facilities. Importantly, this study did not evaluate

an operational managed access system. Rather, investigators conducted focus groups with subject matter experts on the technology, reviewed vendor literature, system performance, and engineering information, and consulted experts in the field of corrections.

While the CCST report noted a number of interesting findings pertaining to contraband cell phones and prison security generally, the key findings related to managed access technology are highlighted here. Worth noting is that the report found glaring inconsistencies across physical screening at state prisons. This security shortcoming translates directly into the need for enhanced countermeasures within prisons such as managed access technology. Complexities of cellular signal capture were noted as a significant technological inhibitor of managed access to be implemented and maintained. A highly dynamic mobile industry that is driven by innovation and consumer demand makes it increasingly difficult to update mechanisms to capture signals and thus block calls.

The CCST report also noted concerns regarding the efficacy of managed access and its ability to be effective within the correctional environment. Specifically, "...managed access system technology today is not mature enough for immediate large-scale deployments...[and] specific protocols for success have yet to be defined" (p. 6). These concerns with managed access were noted as resulting from a lack of available evidence and baseline performance benchmarks of the technology. As such, the report closes with a call for the need to conduct independent research of an operational managed access system within a correctional environment.

The present report seeks to answer this call by providing evidence from the first operational managed access system in a prison in the United States. Next is a conceptual overview and technical description of how managed access technology operates. Following this discussion, the

case study approach is elaborated and the findings are presented. The report concludes with insights and recommendations for future research on managed access technology.

Technical Introduction to Managed Access Technology Concepts and Operations

In this report certain wireless concepts related to managed access of cellular technology are emphasized and described below. Concepts related to wireless interfaces and system coverage are independent of vendor-specific managed access implementation choices. For example, the architectural merits of distributed antenna technology and how they compare to alternative small cell technologies, and vice versa, are not addressed here. Nor are details of specific cellular provider networks and/or related cellular technology protocols. Each managed access technology product and deployment will be unique in many ways, dependent upon the local environment, regardless of the underlying managed access architecture. An examination of “features” associated with competing commercial managed access products are also outside the scope of this report. An overview of cellular system coverage follows, presented in the context of cellular and managed access technology. Managed access wireless system coverage, and how this type of system interacts with nearby commercial cellular networks is fundamental to all managed access deployments, regardless of which commercial managed access product is selected and deployed.

Cellular Technology

Cellular telephony, as a wireless radio service, functions much like other radio technologies. The use of radio technology, when boiled down to bare essentials, involves a process of inserting information of various forms into a radio transmitter which utilizes radio frequency energy to

convey the information through the environment wirelessly. As the wireless energy transits through the atmosphere and surrounding environment some level of radio signal degradation occurs due to a number of predictable and/or unpredictable factors prior to reaching a receiver. If the received signal is intact, a compatible receiver converts the information back into a format useful for its intended purpose. Protocols and procedures used to process the information during wireless transmission, and specific radio frequencies upon which the transmission occurs, vary. Some processes are based on open standards and others on proprietary technologies. Processes are also subject to specific engineering and business needs as radio network systems are developed and deployed. For example, commercial carriers Verizon, Sprint and AT&T each use wireless technologies based on 3GPP LTE standards, but their network wireless interfaces are different in many ways, and non-interoperable, because of specific implementation choices.

Cellular network operators are licensed and authorized by the Federal Communications Commission (FCC) to employ specific radio spectrum frequencies throughout specific geographical areas. Licenses are often granted following successful bids levied in a spectrum auction, often at a cost to a carrier measured in billions of dollars. In exchange for the proceeds from winning auction bids, the FCC grants the winning carrier exclusive use of frequencies so they can build network infrastructure and customer interface in the most optimal way to suit their business plans, as long as they do not exceed the technical and regulatory limitations associated with their licenses. Exclusivity means that they retain sole legal access to authorized spectrum, and this is a right that operators defend vigorously.¹⁵ Any unauthorized signals emitted in carrier

¹⁵ There are a number of Federal proceedings underway that are investigating ways to “share” spectrum, with a goal to more efficiently utilize limited spectrum resources. For example, FCC Docket GN 13-185, Regard to Commercial Operations in the 1695-1710 MHz, 1755-1780 MHz, and 2155-2180 MHz bands, is examining approaches to sharing spectrum between commercial and federal users; Docket GN 12-354 is considering commercial operations in the range of 3550-3650 MHz, currently used by federal users. If these efforts are successful, and commercial carriers are allowed access to new spectrum resources, or other spectrum users are

controlled spectrum space are considered to be interference by the carrier and the FCC. Managed access, considered as a category of technology, operates on these cellular carrier-exclusive network access frequencies to selectively disrupt cellular communications. This process requires close coordination with carriers to ensure systems operate in a legal manner.

For readers who are unfamiliar with wireless cellular technology, it is important to understand that there are constraints related to how wireless systems are designed and how they operate. Subtle differences are significant when considered in context of how managed network coverage is established and maintained. Many radio technologies, such as land mobile radios, are designed to operate in relatively quiet and interference/noise-free wireless environments. These radio services are typically designed to function with relatively few high-powered transmitters using antennas mounted atop tall towers to create networks engineered to operate in a relatively uncluttered radio environment, using technology relatively intolerant of radio interference. This type of network provides efficient signal coverage throughout an area using the fewest number of network sites, via the minimal amount of supporting infrastructure (i.e., additional base stations/repeaters). This is often referred to as technology operating in a “noise-limited” radio environment.

Commercial cellular radio infrastructure can be characterized by a few key distinguishing characteristics:

1. Cellular networks, similar to trunked land mobile radio technology, are bifurcated, composed of a network to customer air interface, often referred to as the “radio access network, or RAN” (i.e., wireless access to cellular towers/base stations) and a network backbone interconnecting the cellular towers;
2. Cellular networks are comprised of a relatively large number of lower powered base stations at cell sites designed with relatively low profile towers densely spaced in a way to efficiently support the greatest number of connections (i.e., users) via the customer

allowed shared access to cellular frequencies, the technical implications facing managed access technology may become very complicated.

wireless interface (i.e., the RAN) and/or to convey the largest amount of data through the access network by immediately offloading customer traffic from the RAN onto non-RAN network backbone connections (e.g., microwave radio, fiber optic cable, copper cable);

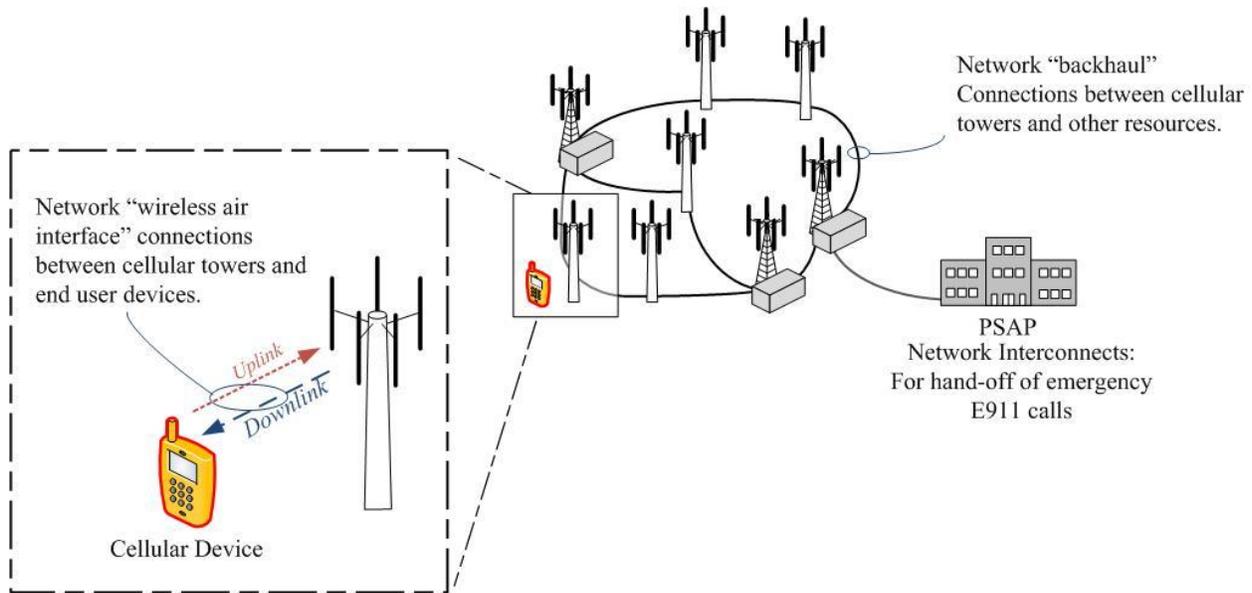
3. Cellular technology, similar to land mobile radio, must support mobility. Cellular networks are designed to support the movement of large numbers of relatively low-powered devices between cell towers that make up the RAN, while maintaining network and data connections, and;
4. Cellular access networks are constructed using a defined set of radio frequencies and a high level of frequency re-use and efficiency in the RAN (i.e., using the same frequency over and over again).

Because of the high level of frequency re-use, cellular technologies are designed to operate amid a relatively high level of radio interference created by adjacent cell sites. This is referred to as an “interference-limited” RF environment, whereby a baseline level of signal interference is expected, in exchange for increased levels of spectrum re-use and spectrum efficiency, driven by creating the greatest rate of return on a carrier’s spectrum investment. Cellular base station density varies by business needs and typically mirrors the number of potential cellular customers; thus the number of base stations in an urban setting is typically greater and more densely deployed than the number of base stations in a rural setting where potential rate of return on investment is significantly less.

In a cellular environment, as with land mobile radio, wireless transmission occurs in two directions. Cellular transmissions from a base station radio transmitter, directed to receiver components within portable cell phone devices are often described as “downlink” transmissions. A transmission in the reverse direction, originating from a relatively low-powered portable transmitter (e.g., cell phone) directed to a base station receiver, is often referred to as an “uplink” connection. In a cellular network, the constraining wireless link is almost always the uplink between a low-powered end-user device and a network base station. If either the downlink or uplink connection components between a device and network fail, or become interrupted, then

communications to or from the cellular device will not work. Both managed access and jamming technologies rely on highly engineered systems to provide radio frequency signal coverage on cellular network access frequencies, but this coverage is required for quite different reasons. Jamming technology disrupts the communications path between the user and the network. Managed access does not; it depends on successful communications to first capture a wireless device and then grants or denies network services available to that device.

A managed access system is, fundamentally, a cellular network with limited scope and reach. A managed access network is designed to present the “dominant” network signal within its limited coverage area. Managed access networks are designed to operate using the same frequencies and protocols as those used by nearby commercial cellular carriers. Cellular devices, such as mobile phones, work by listening for a downlink signal, interacting with the strongest cell tower, and then automatically attaching to the network. A managed access system “intercepts” contraband cell phones by presenting a stronger network presence to a cellular device than nearby commercial towers do. Device to tower communications occurring via the RAN air interface uplink/downlink connections and network core should be further envisioned as having two distinct components: network signaling and customer traffic.



Source: Phil Harris, Engility Corporation

Figure 1. Cellular Network Concepts

Signaling transactions between the device and network that pass through the RAN are essentially part of a network management process used to identify and capture the calling device and then control service connections by requesting, establishing, reserving, and then releasing network resources as calls, data connection requests, or when inbound received calls are directed from the network towards a specific device. These communications are often referred to, collectively, as “overhead” communications. It is important to understand that wireless network backbone capacity is limited; therefore it is allocated to customers on an as-needed basis. Overhead communications associated with network and service management are constant and typically minimal in comparison to bandwidth required to support user voice or data communications. Managed access technology leverages the distinct split between network control and user connection aspects of cellular technology by “managing” network services granted to a specific end user or device. When a cell phone is turned on it initializes its operating system software, searches for and finds a compatible network and then connects to the strongest cell tower. Overhead signaling communications processes are used to “capture” and then direct

how the end-user cellular device interact with the network. This overhead process is used to identify the device, manage how the device interacts with the network (i.e., which tower, which frequency, device identification, user identification and service level) and to facilitate how services are delivered.

To phrase this differently, a cellular device “roams” onto the managed access system when it is operated within the managed access coverage area and becomes subject to local control, implemented via the managed access network which then manages service requests associated with devices¹⁶. Managed access system operations center around policy that defines which calls can be completed and which can be terminated. A managed access system provides the ability to selectively complete call requests made from select authorized phones or emergency calls from all phones, per facility policies and legal guidelines. In addition to blocking illegal calls, managed access systems also provide the ability to capture statistical data in regard to devices that attach to the system and/or data related to call attempts made from attached devices.

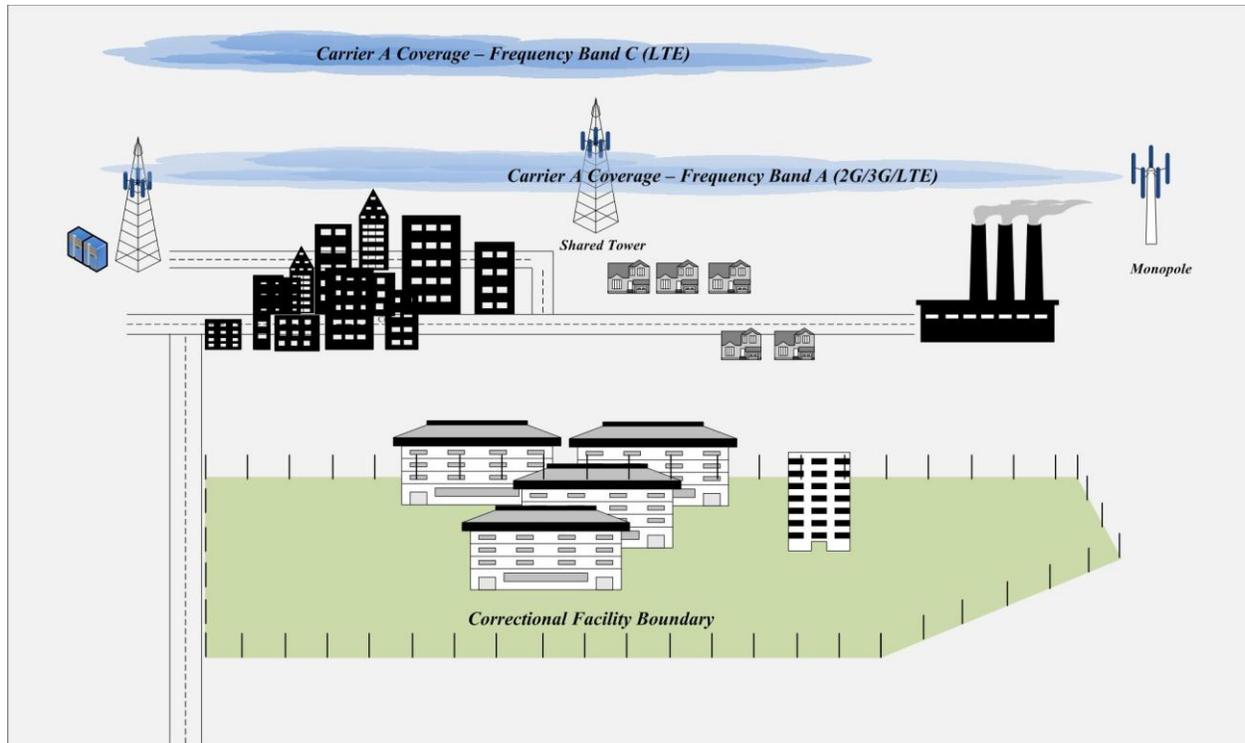
Managed Access Network Coverage

Wireless access network signal coverage envisioned from a simplified conceptual perspective can be depicted as an invisible cloud of radio energy at specific radio frequencies. The energy within a cloud associated with an entire network is additive, comprised of overlapping signals emitted from all antennas located on adjacent cell towers that use the same frequencies. Areas with inadequate signal levels are often described as “coverage holes”¹⁷. Transmitter components

¹⁶ The term “roaming” is used loosely here; managed access systems actually appear to be part of the commercial network by presenting a valid commercial cellular Mobile Network Code to cellular devices. Outbound service requests are explicitly “denied” or “blocked”. Inbound requests are also defeated because the managed access system does not make unauthorized phones visible to the commercial networks; therefore inbound calls to unauthorized phones connected to the managed access network cannot be completed.

¹⁷ Note that the term “coverage hole” in context of commercial network coverage describes an area from which calls cannot be completed. A “coverage hole”, in context of a managed access (or jamming) system describes exactly the

in a portable/mobile cellular device also emit a similar cloud of radio frequency energy that is centered on the current location of the device. How radio energy propagates through the atmosphere is predictable, to some extent, particularly in highly engineered cellular environments. For the purposes of illustration, carrier signals are depicted as different shades of color in the illustrations that follow.



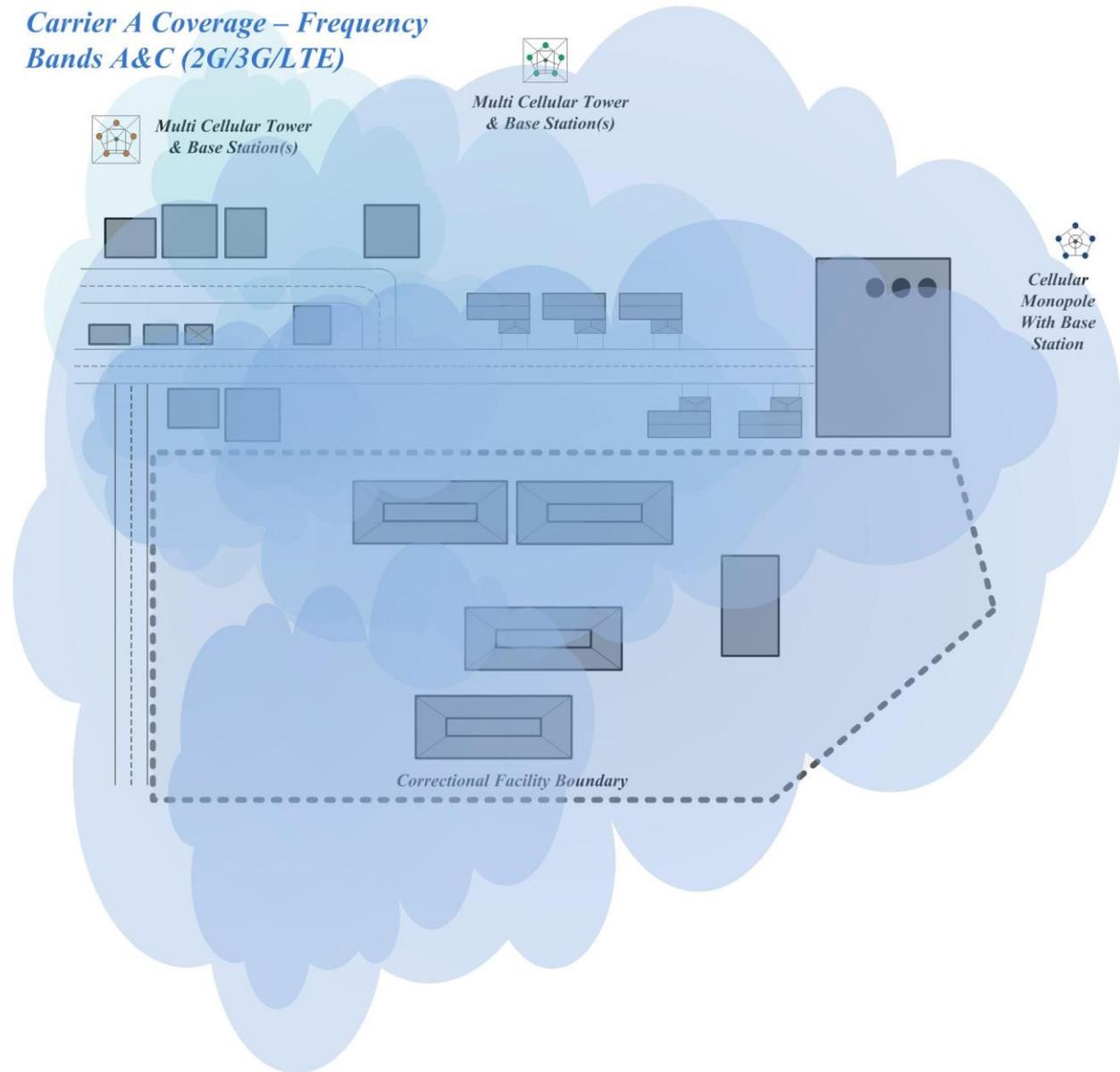
Source: Phil Harris, Engility Corp.

Figure 2. Conceptual View of a Correctional Facility and Nearby Environment

Figure 2 depicts a hypothetical correctional facility sitting adjacent to a town and residential area. In this example “Carrier A” provides wireless services throughout the town and surrounding areas, including wireless coverage that extends throughout the correctional facility. This cellular network operates on two different frequency bands (band A and band C, with

opposite, an area within the managed access footprint from which connection to a commercial network can be completed. Both describe locations with inadequate signal levels.

differing areas of coverage.) Figure 3 provides a top-down view of cellular network radio frequency (RF) coverage for carrier A in this setting.

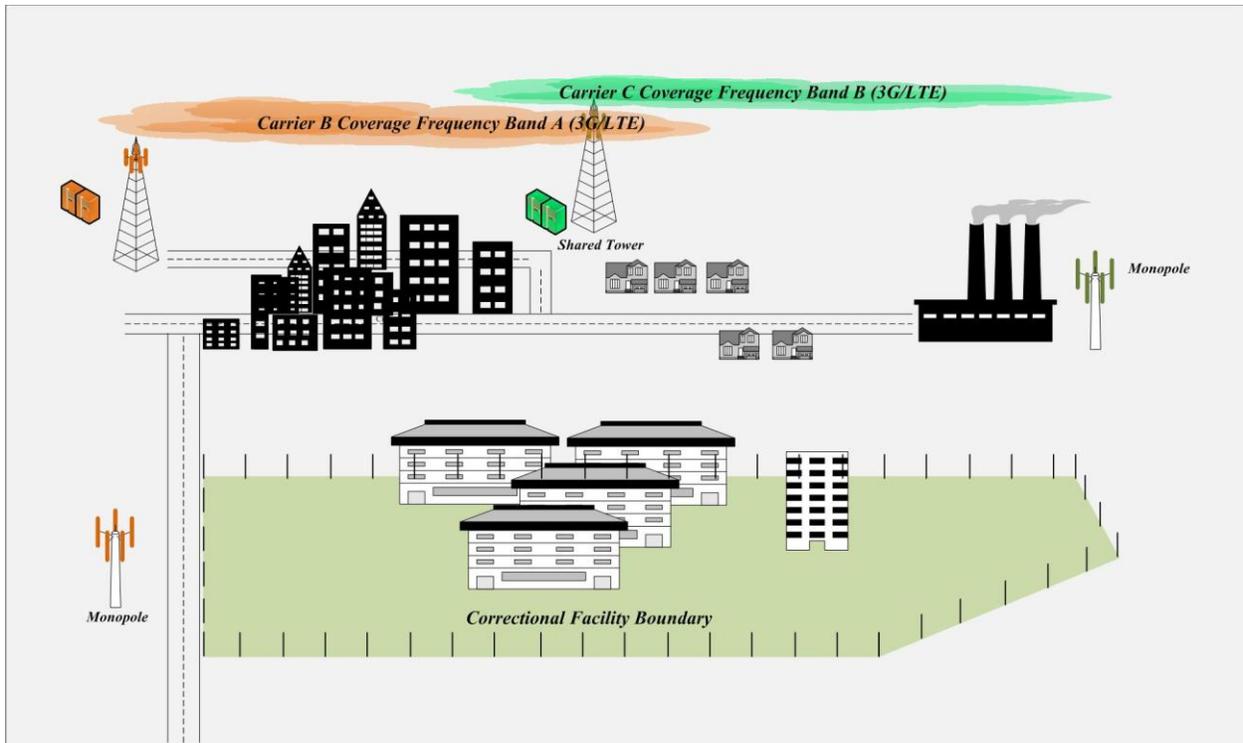


Source: Phil Harris, Engility Corp.

Figure 3. Conceptual Top-Down View of Signal Coverage from Cellular Carrier “A”

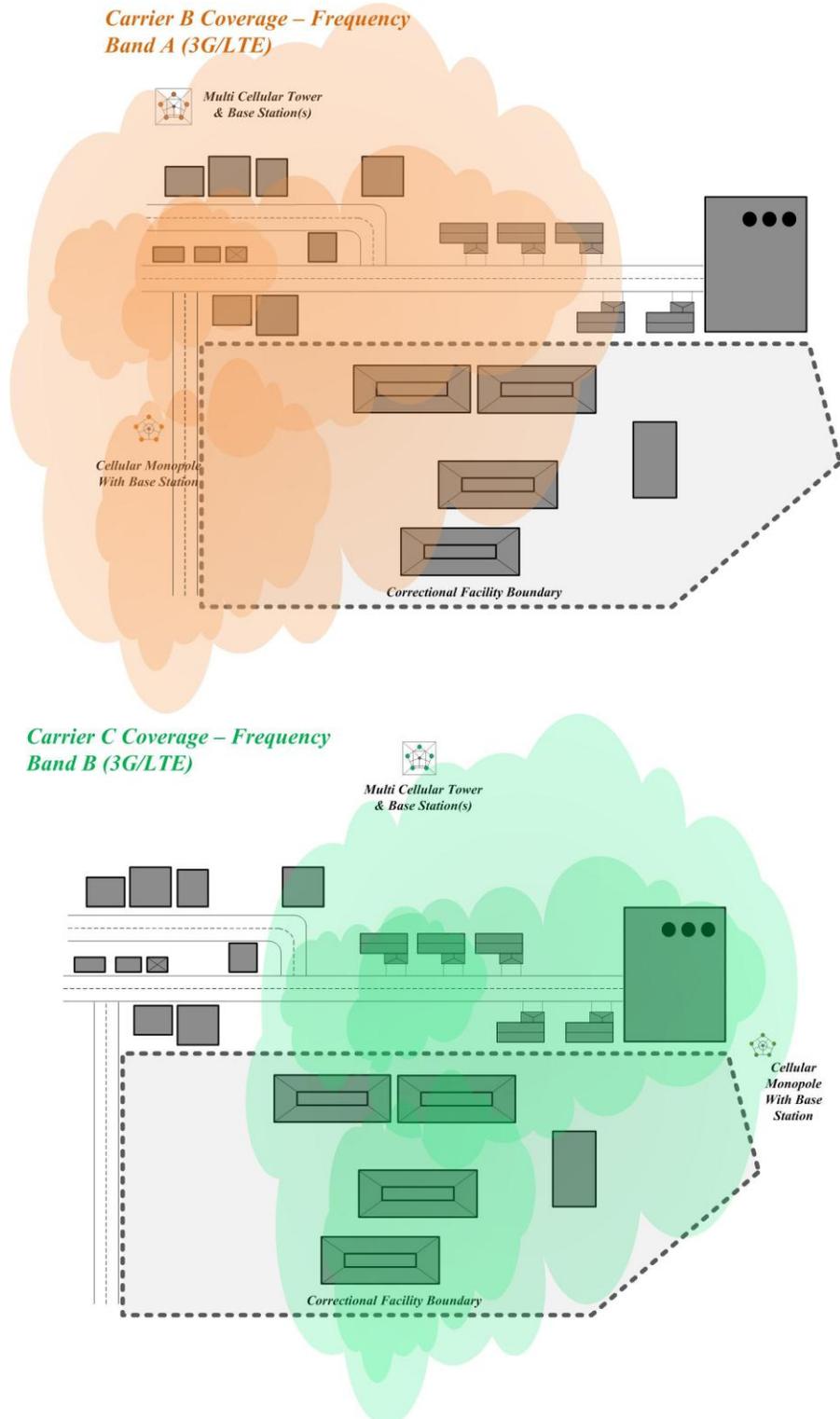
Two additional, competing, networks (B and C) are similarly depicted in Figure 4 and Figure 5. Coverage for each of these three cellular networks partially encompasses our hypothetical correctional facility. Each network is designed to provide a level of coverage suitable to the

operator's business model and customer base, using uplink design criteria associated with a typical portable device performance profile. Some level of inter-carrier resource sharing may occur when common network resources are used or when a tower is leased to two or more competing carriers. Although each network is unique, there is likely to be significant overlap in network coverage.



Source: Phil Harris, Engility Corp.

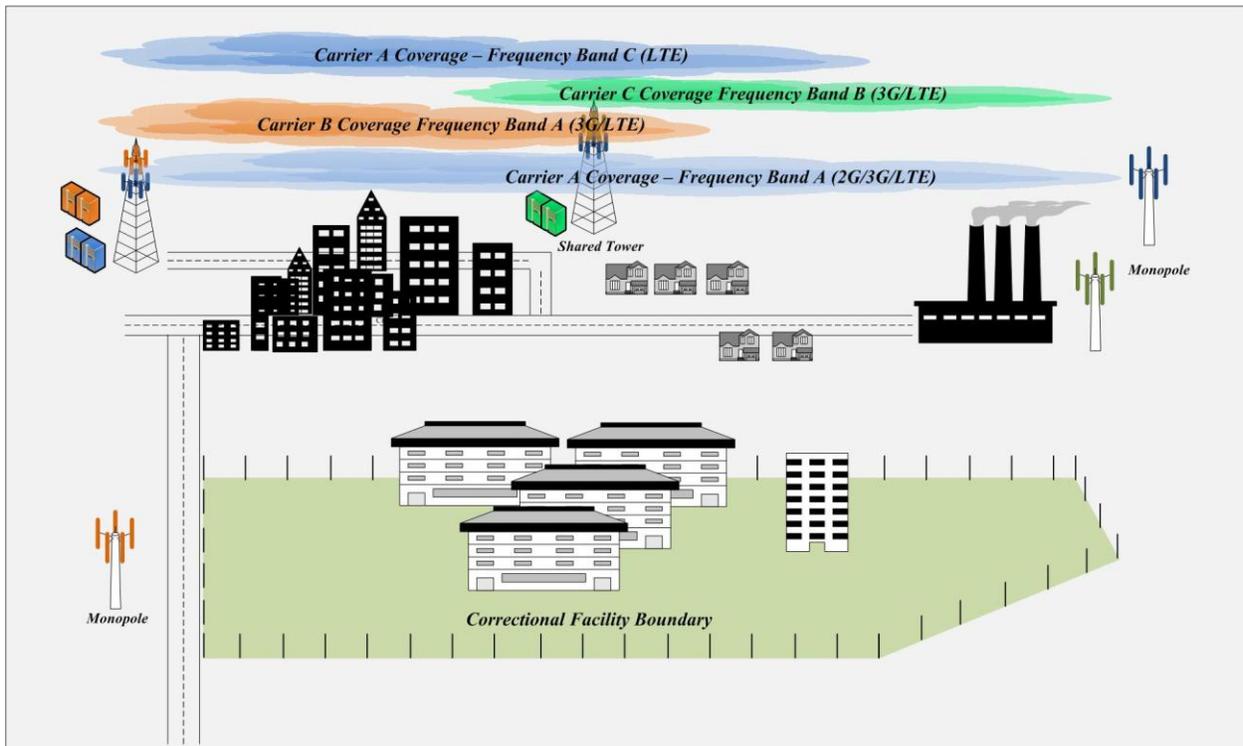
Figure 4. Conceptual View of a Correctional Facility and Carriers "B" and "C"



Source: Phil Harris, Engility Corp.

Figure 5. Conceptual Top-Down View of Signal Coverage from Cellular Carriers “B” and “C”

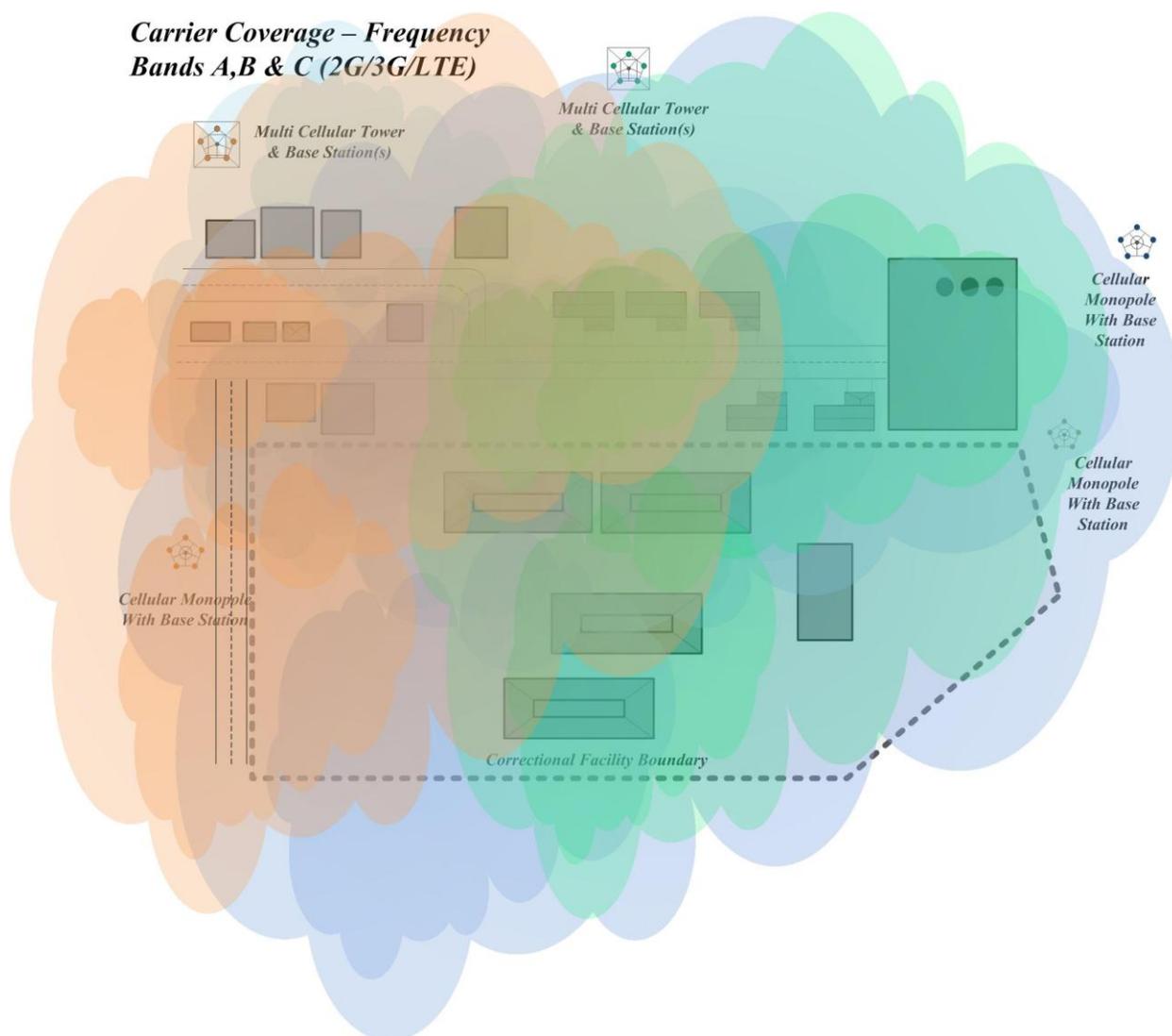
Figure 6 and Figure 7 combine individual carrier views to provide a single view of all three carrier networks. They are included to depict the complexity of the entire cellular wireless environment, and how combined cellular carrier coverage overlaps throughout the hypothetical correctional facility.



Source: Phil Harris, Engility Corp.

Figure 6. Hypothetical Correctional Facility with Carriers “A”, “B” and “C”

It is important to acknowledge and understand this complexity as a combined threat, because any technology deployed to counteract illegal operation of cellular telephones in a correctional environment must, simultaneously, address the entire combined scope of devices connecting to all carrier networks.



Source: Phil Harris, Engility Corp.

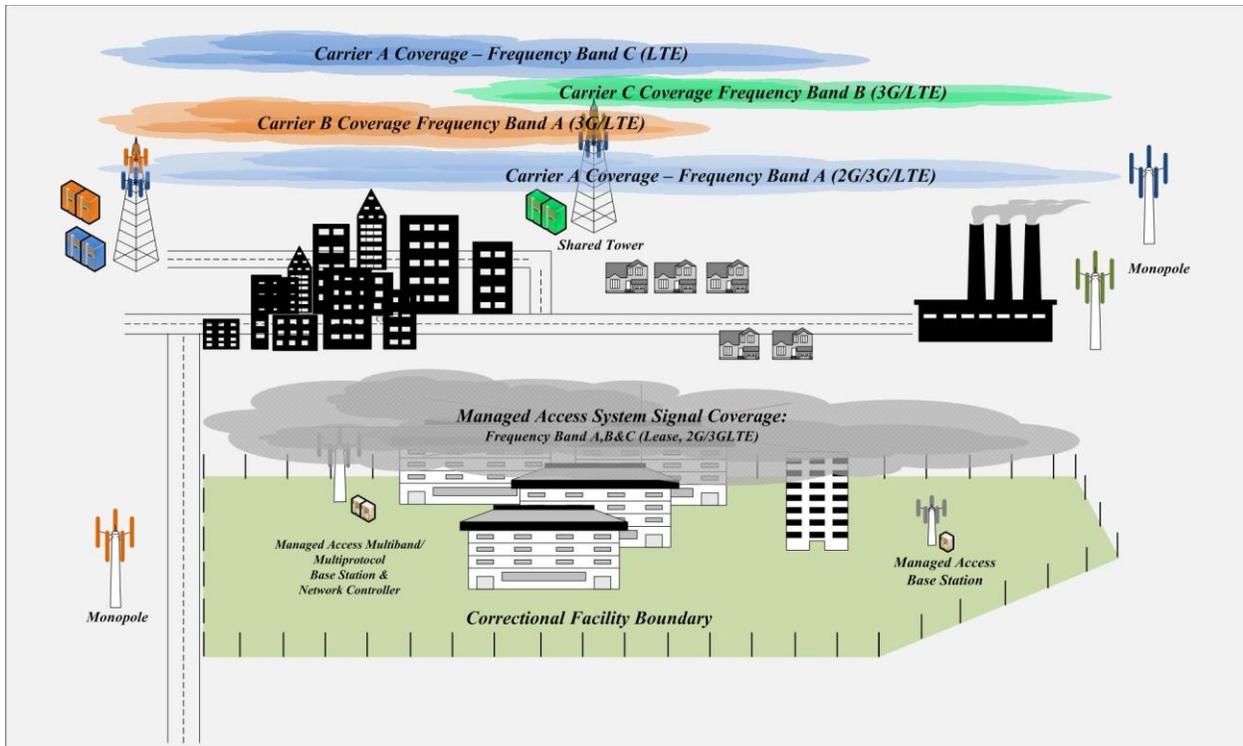
Figure 7. Conceptual Top-Down View: Signal Coverage: Cellular Carriers “A”, “B” and “C”

It is important to note that the commercial carrier network environment is not static. Carriers have the freedom to change the topology and makeup of their network to optimize how their RAN interface frequencies and other network resources are used. Towers/network base stations, and carrier-specific network protocols are all subject to change as the commercial networks evolve. Commercial networks are not interoperable and must be addressed separately because different radio frequencies and protocols are used. For instance, Carrier A and Carrier B may both operate using the same frequency band, yet network devices may not be interoperable

because they have licensed and use different parts of the band. Network changes lead to corresponding changes in how cellular customer devices operate, and which uplink/downlink frequencies and/or protocols are used to support the services that they provide, and therefore network coverage changes as well. As noted above; as cellular operators make changes to their networks, the technology used to counteract the illegal use of cellular telephones must be adapted to ensure ongoing effectiveness. A correctional entity operating a managed access system or consuming services provided via a leased system must ensure that adaptations to counter carrier network changes are handled in a pro-active manner or the system will not retain its effectiveness as the surrounding cellular environment changes and new end user devices become available. Design, deployment, and operation of a managed access system is not a one-time event, it requires ongoing optimization and capability assessment in response to the surrounding environment.

Capture and Roaming

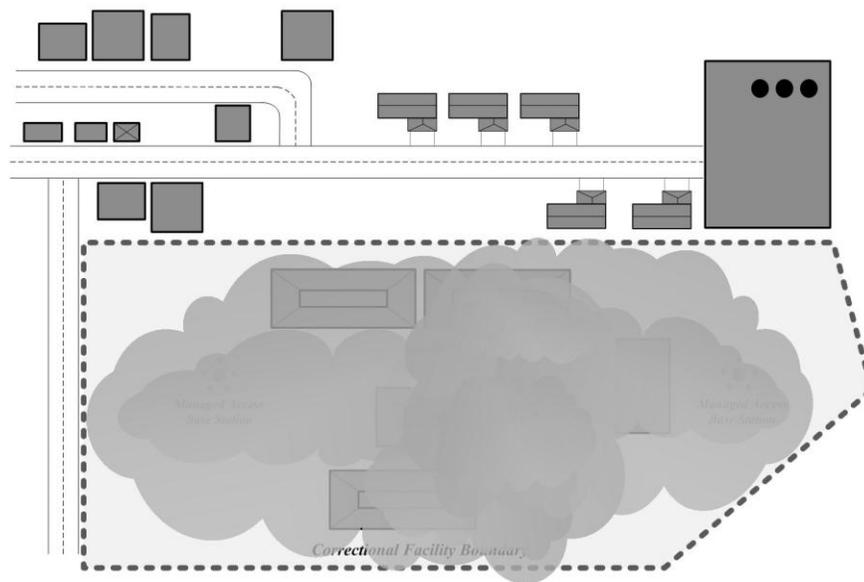
A managed access system is a multi-band, multi-carrier, cellular network of limited scope and coverage that presents itself as, and operates using frequencies leased from, each of the licensed commercial carriers. A managed access system emulates the protocols of each commercial carrier, simultaneously, so it can capture and control calls made using devices designed to work on all of the commercial carrier networks. Network coverage of a managed access system is designed to create and present a dominant signal on all commercial frequencies within a pre-defined area; typically defined by geographical boundaries established in spectrum leases established with each carrier and associated with an entire correctional facility, or at a minimum in specific areas where prisoners are present. This concept is illustrated in areas with grey shading, intended to depict managed access coverage in Figure 8 and Figure 9.

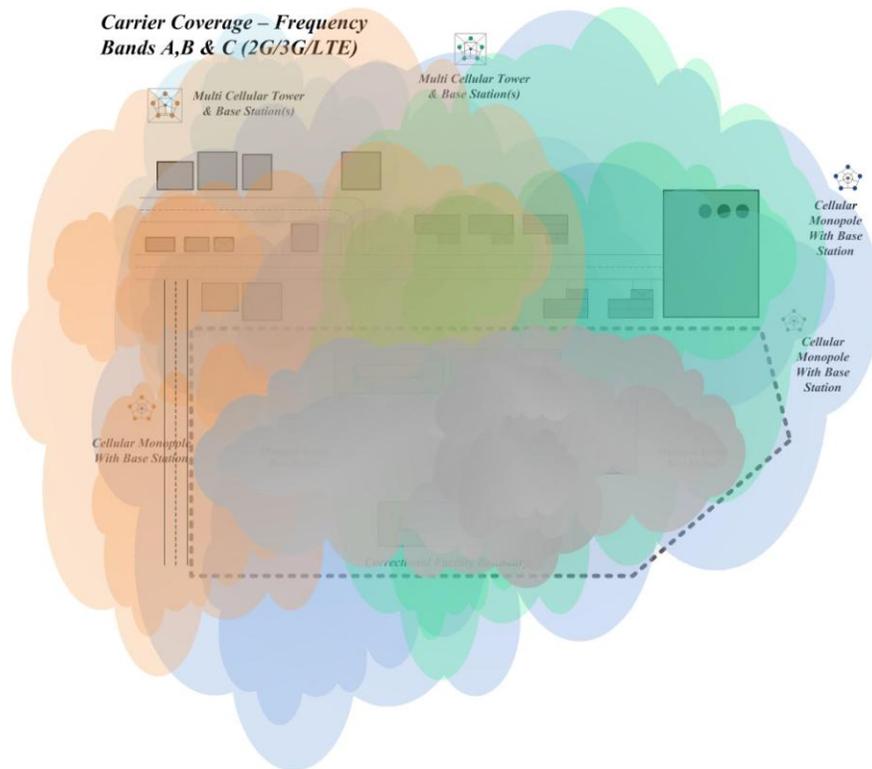


Source: Phil Harris, Engility Corp.

Figure 8. Conceptual View of a Correctional Facility with a Managed Access System

Carrier Coverage – Frequency Bands A,B & C (2G/3G/LTE)





Source: Phil Harris, Engility Corp.

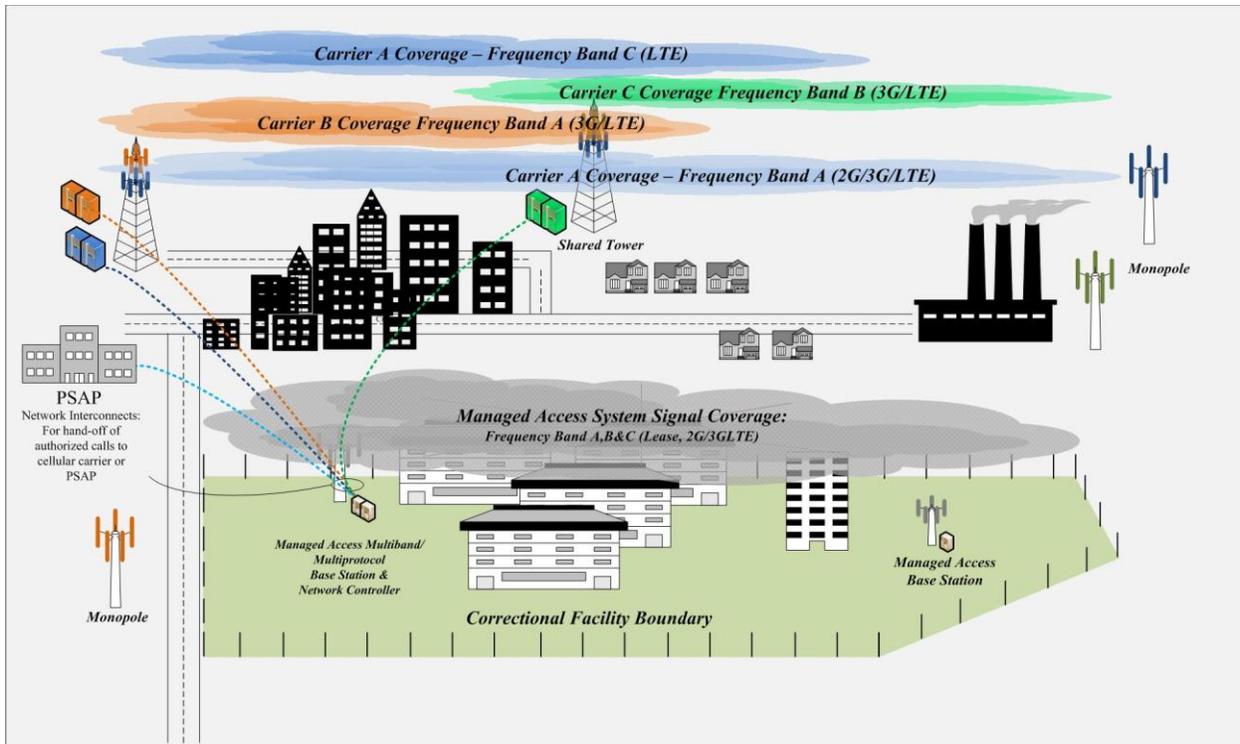
Figure 9. A Conceptual Managed Access System Network and Underlay

Managed access signal coverage is designed to overwhelm those emitted by the nearby commercial network towers. Another, perhaps more familiar, way to describe this process is to envision the managed access network as a cloud of radio energy that sits between illegal devices and the commercial networks. Cellular devices operating within the managed access “cloud” (coverage area) “roam” onto, and connect to the “managed access cellular network” instead of towers that are part of nearby commercial networks. This is analogous to, (but not quite the same as) roaming processes that occur between compatible commercial networks, because the managed access system is presented to the cellphone as part of the commercial network.

Once a connected device is captured, the “managed” aspects of the technology come into play. Disposition of calls originating from devices falling under control of the managed access

network is determined by state law, FCC regulations, correctional facility policies/regulations associated with operation of the network, and terms in the agreements established between the correctional facility and each of the commercial cellular carriers. Legitimate calls, such as those from authorized employees, or 911 emergency calls placed to Public Safety Answering Points (PSAP) can be handed off to cellular carriers for further processing, or routed directly to a PSAP. Implementation specifics associated with managed access are both deployment and system feature dependent.

Similar to network backhaul connections noted above, to support legitimate calls, some form of network connectivity is required between the managed access network and nearby cellular carrier networks, and/or directly to local emergency 911 centers. Implementation choices are subject to local implementation decisions and policies, Connectivity is acknowledged as simple network back haul interconnections in Figure 10. It is important to acknowledge that MAS design must consider both local policies and physical implementation of interconnections, and the recurring cost for these connections must be acknowledged as an ongoing operating expense.



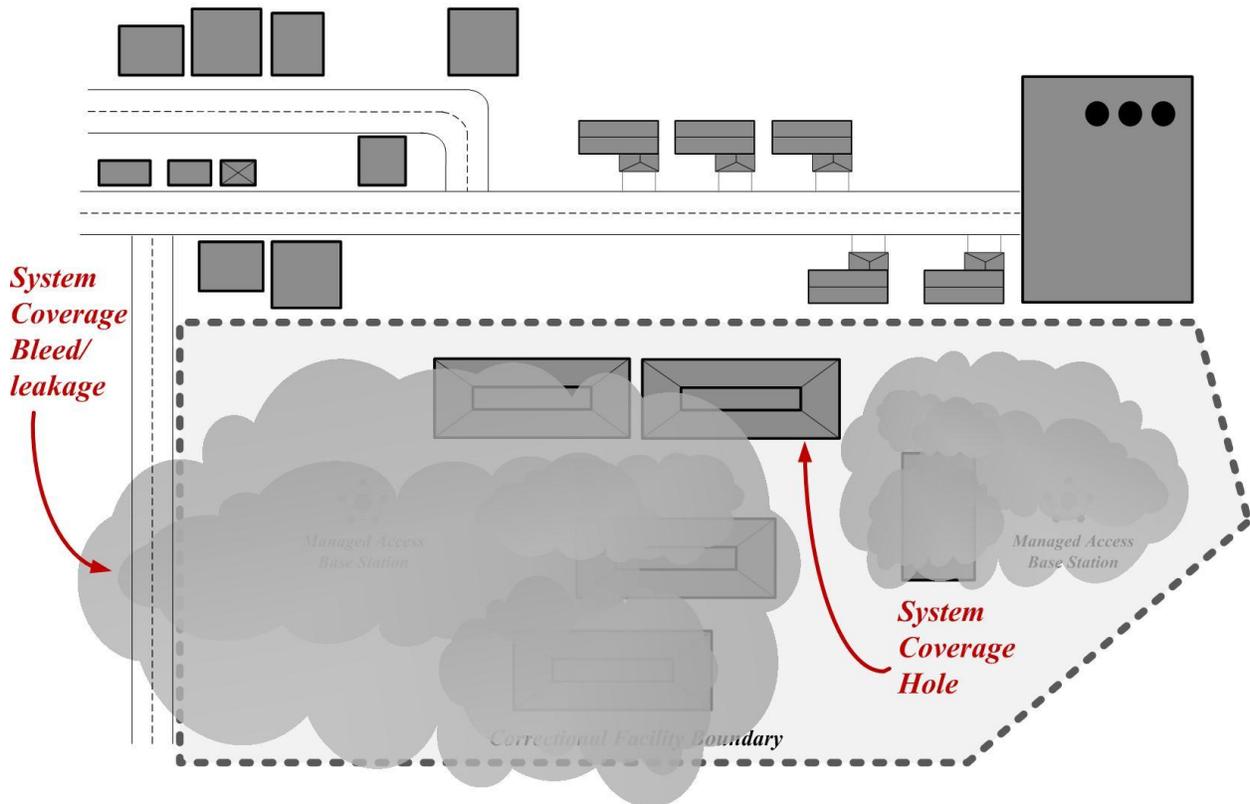
Source: Phil Harris, Engility Corp.

Figure 10. Managed Access System and Cellular System Interconnections

Coverage Related Maintenance

To comply with operational conditions defined within cellular spectrum leases, coverage must not extend beyond a well-defined service perimeter. System coverage changes can have significant impact on effectiveness if it creates coverage holes within the correctional facility. Correctional facility coverage holes can allow users to bypass the managed access system and access commercial networks. Conversely, signal leakage that extends coverage beyond the agreed upon managed access coverage area will lead to disruption of legitimate cellular users in areas where the managed access signal strength overwhelms coverage from a commercial cellular system operator.

Managed Access Signal Coverage Maintenance issues
: Frequency Band A,B&C (Lease, 2G/3G/LTE)



Source: Phil Harris, Engility Corp.

Figure 11. Managed Access System Coverage Hole

Note that a managed access system operator has a *legal obligation* to ensure bleed-over does not occur beyond the defined coverage boundaries of a facility, in contrast to an *operational need* to establish ubiquitous managed access coverage within that facility. Once constructed a managed access system is carefully activated and calibrated so that meets obligations associated with carrier spectrum leases and FCC rules to ensure it does not interfere with nearby commercial operations. After spectrum-lease obligations are achieved, the system can then be tested and further optimized to minimize any coverage holes to ensure expected operational effectiveness is realized within connectional facility. Ongoing compliance testing requirements

and methodology related to spectrum lease compliance may occur on a regular schedule, or in an ad-hoc fashion, depending upon spectrum lease details. Testing obligations and methodology used to confirm ongoing performance goals linked to operational effectiveness are subject to interpretation because these goals are not mandatory; therefore they must be documented in a concise technical manner by the deploying agency, and clearly defined as a requirement in procurement documents to ensure that ongoing operational testing requirements, costs, and associated obligations are well understood by both system suppliers and operators.

Coverage leakage can lead to FCC enforcement action and/or complaints and public relation issues. Coverage issues must be addressed as part of ongoing system maintenance. As previously noted, coverage changes may occur as a by-product of change within nearby cellular networks, or new capabilities introduced in commercial networks operated in areas adjacent to the correctional facility. For instance, a new commercial tower installation or a change in commercial network parameters (such as addition of a new band or protocol) can directly affect managed access system coverage¹⁸. Coverage issues may also result from infrastructure damage to either the commercial network or the managed access system as a result of weather damage or component failure. Any change that affects the relative balance between the strength of managed access and nearby commercial network signal strengths must be resolved.

This overview of managed access concepts and operations has described the conceptual functions of the technology and has identified some of the various factors that can influence system performance, establishing a foundation for subsequent research on user experiences with

¹⁸ A managed access system design, to include carrier-specific managed access antenna placement, needs to address and optimize coverage for each carrier's frequencies; especially if the towers are not co-located or there are different deployment scenarios and each carrier transmits at different power levels.

managed access technology. The following section of the report will discuss the research approach used to generate knowledge about a managed access system deployment.

Methodology

The objectives of this research are to systematically document and provide insight into the implementation, operations, and potential impacts of managed access communication technology. Given the contemporary emergence of managed access system technology as a method to control contraband cell phone use in correctional facilities, the current research is exploratory in nature. A case study approach is most appropriate for this study since very little is known about the technology and the environment in which the technology operates is highly complex (Fitzpatrick and Sanders, 2003; Yin, 1994). A series of interviews and teleconferences, in addition to the secondary analysis of managed access system data, are employed to generate a fundamental understanding of managed access experiences, identify challenges and lessons learned, and provide insights on contraband cell phone activity.

In partnership with the Mississippi Department of Corrections (MDOC), a site visit to the Mississippi State Penitentiary (MSP) was conducted May 2012 in support of this research. Members of the research team included two criminologists, two communications engineers, and a senior policy advisor from the National Institute of Justice. Additional site visit attendees included individuals that were directly responsible for the implementation, management, and oversight of the managed access system. This included a law enforcement officer (MDOC), a managed access systems administrator (MDOC), a managed access system senior manager (MDOC), a technician from the MSP inmate calling system vendor (Global Tel Link), and a technology executive from the managed access system vendor (Tecore Networks).

During the site visit researchers administered a semi-structured focus group. Interview questions were targeted towards perceptions of managed access system usefulness in combating contraband cell phones, obstacles to implementation, successes, and areas in need of improvement (see Appendix B). King (1994) notes that semi-structured approaches are most appropriate for exploratory research as this method relies on open-ended questions that result from probing by the researcher and often times a free-flowing dialogue is created that guides the interview process. Detailed notes were taken individually by four members of the research team (two criminologists and two communications engineers) and then reviewed and transcribed into a single source document. To enhance the validity of interpretations from the site visit, additional teleconferences and continual communication exchanges with the Commissioner of MDOC and MDOC personnel occurred to solicit feedback, clarify and reaffirm the information gathered (see King, 1994).

Official de-identified aggregate data was provided by MDOC for secondary data analysis. These data were extracted from MDOC management information systems used to monitor captured transmissions from the managed access system and cell phone confiscations. Two sets of managed access system data are used. The first consists of the monthly count of all *call attempts* captured by the managed access system implementation in August 2010 to July 2012. The second data set includes daily counts of call attempts captured by the system across a five month period of March 2012 to July 2012. These data are a disaggregated sub-sample of the monthly count data and demonstrates the type of raw information captured by the system. In addition to the frequency of daily call attempts detected, these data include a variety of useful information. The type of call attempts detected by the system can be separated by signals using *call* or *SMS text* cellular functions. The managed access system captures International Mobile

Station Equipment Identity (IMEI) numbers, which identifies a unique cell phone device. IMEI serves as a measure of the number of *unique devices* that are responsible for generating signals. Finally, the system also captures the *destination number* or combination of numbers or keys dialed to place outgoing calls and SMS texts. The results are presented as descriptives.

It is important to note for the secondary analysis portion of this research that any call attempt captured by the system is assumed to emanate from an unauthorized, illegal, contraband cell phone. This assumption is informed by how the managed access technology system operates. Transmissions made from unauthorized cell phones are terminated and captured by the system, while transmission requests made from approved cell phones can be completed.

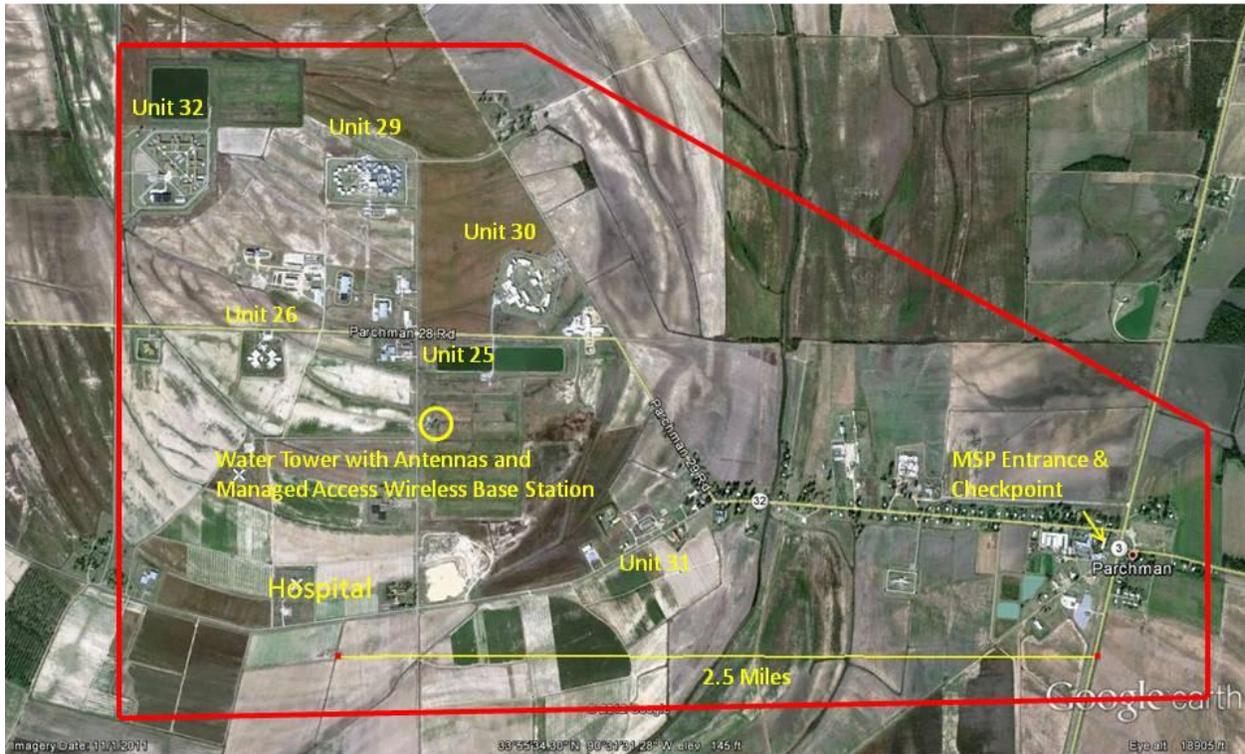
A third and final set of secondary analysis examines the case flow processing of contraband cell phone devices. Managed access system data were merged with internal MDOC cell phone confiscation reports from January to April 2012. This enables a brief “snapshot” comparison of case flow trends in confiscation and subsequent sanction and prosecution at MSP relative to all of MDOC’s facilities. Confiscation reports include data on the number of confiscated cell phones found on inmates (*on person*) or *in common areas* of MSP as well as the number of *rule violation reports filed, cases forwarded to the district attorney, and cases with grand jury pending*. Data on the number of unique devices identified by the managed access system is only available for two out of the four month period. Descriptive results are presented.

Context: Mississippi State Penitentiary, Parchman Mississippi

Mississippi State Penitentiary (MSP)¹⁹

Mississippi State Penitentiary (MSP) is a maximum security facility located at the town of Parchman in Sunflower County, Mississippi. MSP is the state's oldest correctional facility, opening in 1901. Parchman is a rural area of northwestern Mississippi, and the facility encompasses approximately 18,000 acres. MDOC operates their Agricultural Enterprises division at MSP, which farms 6,300 acres of vegetables, rice, soybeans and corn. Figure 12 provides an overview of the location of MSP, reflecting both the geographic dimensions of the MSP property and setting. The red line shows the approximate boundary of the penitentiary. The circle in the interior indicates the MSP water tower that serves as the primary managed access system antenna system support structure. Subsystems are installed within all of MSP's inmate housing units. All of the units are identified by their unit number, except for the Hospital (Unit 42).

¹⁹ Information presented in this section describing MSP was gleaned from annual Mississippi Department of Corrections reports (see Mississippi Department of Corrections, n.d.).



Source: Google Earth, with annotation by Fred Frantz and Pete Small, Engility Corp.

Figure 12. Mississippi State Penitentiary Grounds

MSP has a capacity of approximately 4,648 beds and its infrastructure includes fifty-eight support buildings. MSP has seven different housing units, ranging in size from fifty-six beds in the hospital to 1,521 beds at a primary farming support unit (Unit 29). Only male offenders are housed at MSP. Custody levels managed at MSP include offenders assigned to minimum, medium, and close restricted security classifications. All offenders classified as protective custody, administrative segregation, and death row are housed at MSP. Definitions for these classifications are provided in Appendix C. Mississippi State Penitentiary operations are administered by management staff consisting of a superintendent, three area-based wardens, and five deputy or associate wardens. There are approximately 850 security and non-security employees at MSP.

The facility's capacity was reported to be 4,648. To provide context of the inmate population managed by MSP, Table 1 illustrates total annual inmates populations (as of June 30 each year) for the MDOC and the U.S. as a whole. The overall incarcerated population trend for the MDOC is consistent with state-level incarceration trends across the nation. Incremental increases are observed since 2000 that have been stabilizing in recent years. The population of offenders housed at MSP has been declining since 2000. Fifteen percent of the total incarcerated population managed by MDOC is housed at MSP.

Table 1. MSP and MDOC Offender Populations

Year	MSP	Total MDOC	Percent of MDOC Population at MSP	US State Average of Total Incarcerated
2000	5,229	18,005	29%	38,770
2005	4,340	20,085	22%	43,900
2010	3,261	20,774	16%	45,402
2011	3,055	21,021	15%	44,812
2012	3,354	21,860	15%	44,568

Source: Mississippi Department of Corrections (2014a) and Bureau of Justice Statistics (2013).

Note: US State Average of Total Incarcerated inmates was calculated as the total national population of incarcerated inmates divided by 50.

Findings

Findings are presented in the following three sections. The first section, "Contraband Cell Phones in Mississippi State Penitentiary," provides insight on MDOC's experiences managing the contraband cell phone issues at MSP. The next section, "Managed Access Operational Challenges and Lessons Learned," will identify and discuss both operational challenges and lessons learned from the managed access installation at MSP. These first two set of findings were noted during the site visit and from numerous teleconferences and email exchanges with key informants and stakeholders involved with the managed access system deployment at MSP. The final section, "Contraband Cell Phone Activity," presents descriptive results of MSP's managed access system data. These findings pertain to captured cell phone transmissions from

within MSP and also provide profiles for select mobile devices operating within MSP to illustrate device usage. This section also begins to explore preliminary outcomes on the effect of managed access system on cell phone confiscations. Important limitations and assumptions of these findings are noted in the concluding sections of this report.

Contraband Cell Phones in Mississippi State Penitentiary

Extent of Problem. It is difficult to quantify the extent of contraband cell phones available. MDOC representatives estimated that approximately 25% of the total incarcerated population at MSP was believed to have been in possession of a contraband cell phone. Using the most recent data available on MSP's total inmate population (see Table 1), this equates to 838 inmates in 2012. MDOC, like most states, did not begin keeping record of contraband cell phones confiscated until 2007. For the year 2008, 2,214 contraband cell phones were recovered at MSP. This number grew to over 3,400 in 2013 (Mississippi Department of Corrections, 2014b).

There are a variety of factors that are influenced by the presence and use of contraband cell phones. MDOC representatives noted that cellular devices were being used to gain unapproved phone and Internet access privileges. Importantly, these cellular communications cannot be monitored or recorded. There are documented instances across the nation that these devices are also used to participate in criminal activities including drug dealing, planning and assisting escapes, extorting, threatening or ordering violence against a public or private citizen, and harassing crime victims. The potential for continued criminal behavior is one of the main concerns among focus group participants. Additionally, contraband cell phone use also affects state budgets and Mississippi taxpayer burdens. The use of contraband cell phones reduces the need for designated inmate phone system use, which decreases the amount of revenue available to MSP to support treatment and welfare programming.

Means of Obtaining Contraband Cell Phones. MDOC representatives indicated that MSP's contraband cell phone challenge is associated, at least in part, with visitors and correctional staff members that are paid by inmates to covertly smuggle contraband cell phones for inmate use. MDOC personnel estimate the market value for a contraband cell phone at MSP to range from \$300 to \$1,000 per phone; which makes these devices valuable commodities.

A critical issue for MSP administrators has been the recruitment of MSP correctional officers. MSP is the largest employer in Sunflower County; a county with a 15% unemployment rate which is twice as high as the unemployment rate for the state of Mississippi as a whole (U.S. Department of Labor Statistics, 2015). It was stated that the location of the MSP facility limits the correctional officer employee applicant pool, making it difficult to select highly qualified personnel to fill necessary vacancies and maintain the security of the facility. Similarly, the entry level salary offered to correctional officers has the potential to incentivize contraband cell phone smuggling. That is, the sale of one cell phone has the potential to provide multiple days' worth of wages as correctional offices across Mississippi earn an average wage of \$13.88/hour (U.S. Department of Labor and Statistics, 2013).

As noted, MSP is located in an expansive rural area. MDOC representatives discussed instances in which citizens have thrown or catapulted cell phones over outer MSP perimeter barriers. MSP inmates also spend a significant amount of time working for Agricultural Enterprises and/or performing community services to local municipalities, counties, and state agencies. All of these factors provide opportunities for a contraband cell phone to be accessed by an inmate.

Toward a Managed Access Solution to Combat MSP's Contraband Cell Phones. MDOC examined a number of potential alternative technologies as tools to assist in the battle to control

illegal cell phone use that would supplement their procedures for contraband searches of persons entering the facility. MDOC deployed and continues to use canine teams to detect and confiscate cell phones. MDOC and also explored several products/systems designed to identify the presence of phones, including passive cell phone detection technologies. There were a number of concerns with these technologies when they were piloted including:

- Products interfered with officers' radios.
- Products disrupted cell phone communications of MSP employees who reside on the grounds of the facility.
- Products generated false detections, particularly around coax cables.
- Products did not perform well due to materials used in prison construction.
- Products provided detection, but not location information.
- Portable products were bulky, and their use could not be concealed, reducing their effectiveness.
- Manual searches were still required upon detection, which were labor intensive, disruptive, and exposed officers to potential safety issues.

MDOC considered additional approaches to physically blocking the introduction of cell phones into the facility such as body scanners and large nets around the perimeter and concluded that additional measures were required. While MDOC was assessing various passive detection technologies, it was noted that the Commissioner received an advertisement for a managed access technology product. This information was passed to Global Tel Link, who held a contract to be MDOC's designated landline phone service provider. After reviewing information pertaining to a similar system deployment in a Puerto Rico prison in December 2009, MDOC administrators determined that managed access provided the capabilities needed to affect

contraband cell phone use in their facilities. MDOC indicated that the managed access system at MSP was subsequently procured from Tecore on an expedited basis by Global Tel Link, and then installed, and made fully operational by Tecore in August 2010. MDOC supported the Global Tel Link deployment process by providing physical infrastructure required to support the system, to include AC power, fiber optic cable, concrete slabs and other items. MDOC representatives noted that that the brick and mortar aspects of the system deployment were completed quickly and the system provider (Tecore) noted that that the foundation for legal framework associated with spectrum leases had been well underway prior to this deployment. Significant details in regard to what happened in the first six or seven months in 2010, or in what order things happened were not provided. The fact that the MSP design is a single site system, which uses an existing water tower as the primary antenna support, certainly facilitated an accelerated deployment.

Tecore Networks is the MSP managed access network technology provider. Tecore's technology foundation is a product referred to as the iCore®, a software defined all-IP core network component with a scalable software architecture that provides functionality compatible with large commercial systems. The iCore® product provides support for current 2G, 3G, and 4G cellular technologies with claims to be upgradeable in support of future 5G technologies.

Managed Access Operational Challenges

A number of operational challenges experienced by MDOC personnel while deploying and operating a managed access system at MSP were identified. These challenges are presented to inform practitioners and vendors alike. The former should be conscious of these issues leading up to, or perhaps in the wake of, a procurement decision. The latter should take these challenges

into consideration when evaluating their product delivery and maintenance services. Table 2 provides a summary of the operational challenges of managed access found in MSP.

Table 2. Summary of Operational Challenges and Associated Issues

Operational Challenge	Issues Associated with the Challenge
1. Managed access has to be routinely “managed”	<ul style="list-style-type: none"> • Creation and updating of approved “white list” phone numbers
2. Managed access must include an effective self-monitoring capability	<ul style="list-style-type: none"> • Without telemetry and self-monitoring features a system will not alert the operator about equipment or component failure leading to fluctuations in signal strength. • The MSP system does not automatically self-adjust signal strength.²⁰
3. Signal strength of managed access systems - signal bleed over	<ul style="list-style-type: none"> • System signal coverage must be routinely checked to ensure the signal remains within the designed coverage parameters and spectrum lease conditions outside the facility. • Phones outside prison facility can be captured by system, resulting in blocked calls from legitimate commercial users.
4. Signal strength of managed access systems – coverage holes	<ul style="list-style-type: none"> • Coverage must be routinely checked to ensure the signal strength is dominant within the facility to remain effective. • If competing signal strength from a nearby commercial network is stronger, illegal cellular call attempts may bypass the managed access system and create system coverage holes.

²⁰ This may be true of other managed access products as well. Implementing a system capable of self-monitoring and adjustment of signal strength for lease compliance would require a network of permanent sensors throughout the periphery of the correctional facility operational area (e.g., lease area) constantly assessing signal levels to ensure bleed-over does not occur. Similarly to optimize effectiveness inside the periphery, a network of sensors would be required within the correctional facility to assess coverage. Both of these “sensor networks” would feed an automated system to monitor and adjust signal levels; not impossible, but a capability that would significantly increase system costs. For this reason, ongoing MAS maintenance procedures, to include signal level maintenance, must be defined as part of the ongoing cost of ownership.

Operational Challenge	Issues Associated with the Challenge
5. E-911 call management	<ul style="list-style-type: none"> Requires cooperation with both cellular carriers and local Public Safety Answering Points. Implementation varies by vendor and local requirements; Tecore directs 911 calls to public safety answering.
6. Technology upgrades by cellular carriers can significantly reduce effect system effectiveness.	<ul style="list-style-type: none"> Managed access technology must be in sync with the technology deployed in nearby commercial networks. Failure to do so will result in system coverage holes, create coverage bleed over, or simply allow callers to bypass the system.
7. Managed access systems should be hardened to resist damaging weather conditions.	<ul style="list-style-type: none"> Antennas need to be adjusted after strong winds to restore proper coverage. Commercial electrical power brown outs effect signal system performance.
8. Managed access systems should be hardened against sabotage: Inmates may attempt to sabotage system infrastructure.	<ul style="list-style-type: none"> Inmates at MSP had attempted to cut exposed cables as well as drive a field tractor into managed access infrastructure.

Managed access must be routinely managed. MDOC stated that they anticipated the system would be a “plug-and-play”, based on vendor information; however unexpected real-world elements came into play that changed initial expectations in regard to how the system should perform. MDOC stated that occasional system maintenance-related performance issues are addressed as they occur. MDOC stressed that confirmation of the coverage area was an ongoing maintenance task. MDOC personnel indicated that they did not anticipate the resources required to maintain and manage the authorized caller database. It was unclear what specific personnel were permitted for inclusion on the approved call list at MSP. No policies with respect to organizational rank or position for inclusion on the approved list were observed. Once this approved phone list was created and integrated into the managed access system, this approved list was constantly in need of updates to add or remove authorized devices as personnel were

hired, given access, or were no longer employed at MSP. No estimate was provided with regard to the frequency of occurrence of this task at MSP, just that it was “a regular occurrence.”

MDOC emphasized that “managed access is ‘managed.’” These sentiments were reiterated throughout the course of discussions. An over-arching, and generic concept that is critical to the operation of managed access systems is the fundamental capability to distinguish between telephone calls that will be blocked by the system from those that will be permitted (i.e., what other types of communications, such as instant messages or emails, will be passed through the system). As noted above, the goal is for all compatible cellular devices within system coverage to connect to the system so that call completion procedures and data service requests can be processed through the managed access system: therefore only authorized calls or data connection requests are successfully processed through the managed access system. To be successful, information about authorized users must be known in advance and pre-configured into the managed access system database. Once a cell phone connects to the managed access system it is captured by the system, and those not configured in the database are denied service. For voice calls, the system intercepts and blocks the call service requests. A voice notification advises callers that it is a felony to use an unauthorized cell phone device within the facility. Unlike intercepted voice calls, no feedback is provided to a user if a text message is blocked by the system; unauthorized data/text service requests are simply terminated and not completed by the managed access system.

Global Tel Link telephone analysts work with MDOC to implement and maintain a database to identify devices from which authorized communications can be made once the device connected to the managed access system. Global Tel Link also records and maintains data generated by the systems that can be used to identify unauthorized call attempts from illegal

cellular devices that have connected to the managed access system. They also generate various managed access reports using data captured by the system. MDOC noted that data stored in confiscated phones include activity logs which can be compared against event logs created and stored in the managed access system. This data can be correlated to assist in identification of system maintenance-related issues. Correlation of these data sets can be used as a tool to identify times when an increase in completed calls occurred, which may provide an indication that the managed access equipment appeared to be malfunctioning or inoperable, confirming a need for system maintenance.

Managed access must include some self-monitoring capability. Global Tel Link employees are responsible for overall general system maintenance. MDOC indicated that Global Tel Link initially monitored system operational status remotely and that information in regard to operational status to include notifications about system impairments, or equipment outages, were not always passed to MDOC from Global Tel Link. As a result system monitoring procedures were modified to add requirements for on-site technical support personnel, and adjustments were made to system fault information reporting procedures to ensure that information is passed to the MDOC Electronic Surveillance Center which monitors the facility's security and operations via closed circuit television.

Further complicating challenges associated with operating the MSP managed access system was the absence of an effective telemetry, or self-monitoring capability to detect equipment failures within the system. At the time of the site visit, system performance was measured by technicians as part of a routine scheduled maintenance program. This implementation lacked mechanisms to self-diagnose equipment failures that may lead to fluctuations in signal strength or inoperable equipment. This diagnostic shortcoming was compounded by the issue of adverse

weather. Weather issues at MSP were significant enough to warrant inclusion in this report to raise the issue for both practitioners and vendors of managed access²¹. System requirements should be specified in the procurement process mandating that components be hardened sufficiently to withstand harsh weather conditions experienced at the correctional facility. Note that, for example, that an antenna which is misaligned as a result of a weather event may remain fully operational, but MAS transmission (and reception) would be pointed in an incorrect direction. This would result in unexpected changes in system coverage area resulting in signal bleed-over or unexpected coverage holes.

Signal strength of managed access system and signal bleed over. Coverage within facility bounds is directly, and solely, related to system effectiveness and how it meets the needs of its operator; in other words operators with nearby facilities may have little interest in how a managed system performs as long as it does not impact their network. System coverage beyond the boundaries of the correctional facility will effect nearby commercial network users, and coverage bleed-over is also related to lease and regulatory issues.

Core MSP managed access system components are housed in a telecommunications shelter that sits adjacent to the MSP water tower which is centrally located in the correctional facility. The water tower serves as the primary managed access system antenna support structure. The system also includes subsystems that extend, or improve, coverage within all seven of MSP's inmate housing units on the grounds of the facility. It was noted that subsystem installations required engineering and construction of conduits routed through areas within the buildings to

²¹ At the time of this report, there were two news reports of weather-related system outages at Parchman, one in August-2010, and a second one in March 2014 that resulted in inmates sending images via illegal cell phones. This is documented as a news item at <http://raycomnbc.worldnow.com/story/24945407/exclusive-contraband-phones-inside-parchman>

ensure that cabling would be isolated to minimize vulnerability to inmate tampering. Appendix D provides additional information concerning MSP infrastructure.

When the MSP system was initially installed, calls originating nearby, but outside of the penitentiary grounds, were captured resulting in a number of improperly blocked calls. To resolve this issue, coverage was adjusted, leading to a decreasing number of intercepted calls. As the success of managed access is reliant on its coverage area, the signal strength of the managed access system cell tower requires routine observation and adjustment to ensure it provides adequate signal strength throughout, but not outside the designated coverage area. Since a cellular phone automatically connects to the strongest available signal from the subscriber providers' network, it is critical that a managed access system always presents the strongest signal to cell phones within the managed access system designated coverage area. Failure to actively monitor signal strength can result in a contraband cell phone connecting to a commercial tower outside the facility, bypassing the managed access system. Achieving optimal signal strength at MSP was not as simple as increasing or decreasing the managed access system signal power. Negotiations with at least one nearby cellular carrier was determined to be an important factor in maintaining proper coverage; MSP noted that they had to request that at least one carrier reduce downlink signal strength from a nearby cell tower.

To remain effective, coverage within the managed area must also be confirmed as the equipment ages and as the wireless environment around the facility changes over time. System effectiveness requires balance between wireless signal strength of the managed access system and nearby cellular carrier base station signals; the managed access signal must be configured so that that the managed access system signal is only strong enough to "capture" cell phones operating within its pre-defined operational area, and weak enough to ensure commercial

networks capture all phones operating legitimately in adjacent areas. It was noted that Global Tel Link conducts a drive test at least once per week around the perimeter of the facility (and the leased fields) to ensure that the managed access system does not exceed pre-designated coverage areas. It was noted that the MSP system drive test route covers approximately 36 linear miles. The MDOC estimated that after about six months of effort the number of nearby calls intercepted reached a steady state of roughly one call per month. Tecore noted that they developed a wireless coverage design for the MSP system, and then worked with each carrier to define/quantify signal coverage. It was noted that carriers were helpful during the design process; for example they suggested technical parameters such as required angles for managed access system antenna down-tilt. Spectrum access and conditions associated with managed access system design will vary significantly, and coverage parameters will be unique to each facility and, as previously noted, will require site-specific managed access network designs.

One example was provided by MSP personnel where a local farmer was tending his field near the facility and attempted to make a call while on his tractor. The farmer contacted MSP officials after receiving the automated recording generated by the system alerting the user of their illegal call attempt. This situation was remedied as MSP personnel reviewed his situation and included his number on the approved list. At the time of the site visit, MSP was in discussions with Tecore about the possibility of installing additional sub-sites (small cells) within the facility to improve system coverage within some buildings. These sub-systems would provide local signals strong enough to capture a cell phone in or near the building and then interact with the core switch. This would reduce the likelihood of bleed over by increasing the signal strength only within specific buildings.

Signal bleed over constitutes a serious consideration for potential managed access users, especially those located in more urban environments. Signal bleed over, as well as cellular carrier cooperation have implications for a widely acknowledged concern of managed access; interference with emergency 911 calls. The *Wireless Communications and Public Safety Act* of 1999 prohibits the use of any technology that can interfere with emergency 911 calls. The senior system administrator at MSP recalled that MSP and Tecore conducted tests of the call set up time for 911 calls through the managed access system. It was determined that a 911 call bypassing the managed access system took about 4.5 seconds to connect, compared to 7.0 seconds through the managed access system. Despite this slower time, this measurement is well-within the 10-20 second benchmark noted within the National Emergency Number Association (2006) call standards.

9-1-1 call management. A critical aspect of managed access system operation is the relationship between the managed access system, nearby commercial cellular system operators, and Public Safety Answering Points (PSAP). Authorized calls placed through managed access system are essentially placed once the user connects, or roams onto, the managed access system which processes the call for completion. Connection processes for service requests from authorized phones require network connections between the managed access system switch and cellular carrier mobile telephone networks and similarly, PSAP connections are required to successfully connect emergency 911 calls (see Figure 10.)

System deployment tasks include the establishment of support mechanisms to facilitate routing of emergency 911 calls. Typically, this involves a direct routing of calls between the managed access system core and a local 911 or PSAP call center to handle emergency calls passed to them from the managed access system. System interconnection and call completion

processes are influenced by local PSAP technical requirements and local landline telephone services associated with how the local the 911 network operates.

Tecore discussed how 911 calls are handled by the MSP system. It was noted that the MSP system routes 911 calls placed directly to the nearest PSAP. This is in contrast to other managed access implementations designed to simply pass emergency through cellular carriers for further processing and eventual call routing to a PSAP. It was noted that potential response issues will occur if the carrier is not provided information indicating that an emergency call originated within, or in the immediate vicinity of, the managed access system. As a result, cellular carriers may require emergency call routing directly to a 911 center/PSAP as a condition of a spectrum lease.

Technology upgrades by cellular carriers can significantly reduce system effectiveness. Managed access system coverage, and how it coexists with the surrounding cellular carrier environment, affects the ability of the system to terminate/block unauthorized calls and capture calls placed by legitimate device users operating devices in locations directly adjacent to the space controlled by the managed access system. The wireless environment is the primary interface between a user device and either a commercial network, or the managed access system network. Blocking calls associated with nearby legitimate cellular system users is considered to be interference by cellular carriers

Legal operation of a managed access system, using frequencies licensed to a network operator, must be carefully coordinated and authorized by both the carriers and the FCC to ensure legal access to carrier spectrum. MDOC indicated that there were several operational cellular carrier networks providing coverage in the Parchman area: AT&T, Verizon, C Spire, and either T-Mobile or Sprint. MDOC noted that commercial carriers had been cooperative, but the

processes associated with establishing managed access technology presented a new issue for commercial cellular network operators as well. When obtaining FCC authorization, spectrum lease arrangements are required for each carrier prior to operation of the system in their frequencies. As previously noted, the managed access system owner/operator needs to ensure that all wireless provider frequency bands in the area are covered by the managed access system. Tecore noted that the MSP project resulted in the first managed access spectrum lease agreement for Verizon. It was also noted that the MSP spectrum lease agreements do not involve recurring payments to the carriers although, in some cases, the cost of specific items such as carrier legal expenses required to prepare spectrum lease agreements were incurred.

A Tecore representative indicated that the company spent 18 months lobbying, negotiating with the FCC, and with interfacing with cellular system operator legal teams to define a regulatory solution/process suitable for managed access system deployment. Tecore indicated that these activities were well underway prior to the MSP system deployment. MDOC and Tecore emphasized the importance of carrier cooperation when establishing spectrum lease agreements. Global Tel Link is responsible for the ongoing operation of both the non-cellular inmate phone service, and the MSP managed access system. If a commercial service provider deploys a new cellular technology (e.g., 3G/4G LTE), Global Tel Link works with the managed access vendor to acquire necessary hardware and software upgrades required to ensure the managed access system continues to restrict network access via devices using the new technology.

This challenge requires collaboration and open communication with cellular carriers to manage network changes and carrier rollouts of new cellular device technology. Managed access system technology must be in sync with the commercial network to ensure that it can

capture devices made available to consumers. Advancements in cellular network technology occur over time, and then are activated in a very short timeframe. Even if managed access users are informed in advance of planned carrier updates, there are a number of potential negative consequences for managed access systems as a result of commercial network changes as a carrier makes an upgraded service or capability available within the market surrounding the managed access system.

This was the case for MSP when AT&T activated 3G technology in the Parchman area. The managed access system at MSP was not yet capable of capturing 3G cell phones. As a result, any call attempts from a contraband cell phone using 3G went directly to the commercial carrier. Anecdotal information also suggests this AT&T 3G rollout coincided with a significant reduction in calls captured by the system. As the managed access system hardware and software were updated to be compatible with 3G technology, the number of denied calls appeared to elevate and return to pre-3G levels. It should be reinforced that this relationship is speculative and assumes that contraband cell phones were 3G capable. Data to test this relationship were unavailable.

Network operators grow their networks and update technology over time, and these changes will impact the effectiveness of a managed access system. Timely notification to managed access operators about change in nearby commercial networks is paramount. MDOC noted that subsequent to MSP system deployment AT&T activated 3G services in the Parchman area, without advance notification to MDOC. It was several months before MDOC realized that the managed access system needed to be upgraded to intercept 3G calls. It was also noted that carriers were supportive in regard to notifications, but the notification process was not routine for them; therefore notifications were inconsistent. A managed access system operator needs to

receive notifications well in advance of carrier changes so that the impact to the managed access system can be assessed, allowing time for corresponding managed access system hardware/software upgrades, and/or coverage changes in response to the changing wireless environment. Global Tel Link and Tecore indicated that carrier sublease agreements include notification clauses but they do not include required enforcement mechanisms.

Managed access infrastructure needs to be hardened. The MSP system experienced occasional power issues such as brown-outs and outages that were beyond the control of MDOC or managed access system vendors. A variety of additional uncontrollable factors affected system performance. For example inclement weather causing high winds can change the orientation of the antenna system. MDOC does some level of troubleshooting to identify when and where problems occur, and the attitude of the MDOC and their commercial partners is that all technical issues were solvable. Tecore indicated that the system was continually being improved, and that the issues described were occasional problems.

Inmates may attempt to sabotage the system infrastructure. A final challenge that was observed at MSP was the ever-present need to harden system infrastructure against vandalism. There were two specific incidents in which inmates at MSP attempted to sabotage the managed access infrastructure. One attempt involved inmates cutting exposed cables running from underneath an equipment enclosure while the other involved an inmate on agricultural assignment running a field tractor into an equipment enclosure. Follow-up investigations into these incidents revealed a directed attempt to sabotage the system. To protect against such incidents, MSP personnel buried all cable and erected fencing around exposed system infrastructure. These hardening efforts constituted unplanned financial costs incurred by MSP.

Practices and Lessons Learned.

For organizations seeking to implement a managed access system, a number of lessons were learned from MSP's experience. These lessons learned are provided to inform both practitioners and vendors of mechanisms to enhance the effectiveness of managed access. A summary of these lessons learned and the context within which they can be applied are provided in Table 3.

Table 3. Summary of Operational Lessons Learned and Context for their Application

Lesson Learned	Context of Application
1. Advocate for amendments to existing legislation governing contraband cell phones	<ul style="list-style-type: none"> • Legislation was amended to close loopholes in the law Rather than an inmate having possession of a complete cell phone, legislation prohibits possession of any part of a cell phone (i.e. battery, SIM card, etc.)
2. Establish cooperative partnerships with cellular carriers	<ul style="list-style-type: none"> • Effective reach of managed access is greatly enhanced with additional carrier support Ability to prove a cell phone is operating within correctional facility to allow a carrier to permanently disable the device
3. Cross-reference captured phone call information with existing pre-approved list of inmate landline numbers	<ul style="list-style-type: none"> • Managed access captures the destination phone number of illegal cellular call attempts and makes it possible to cross reference these destination numbers with existing pre-approved inmates contact numbers for landline use This cross reference allows correctional personnel to identify the inmate likely possessing a contraband cell phone
4. Managed access provides a layered approach for counter-measures beyond traditional search capabilities	<ul style="list-style-type: none"> • Deterrence resulting from legal sanction and inconsistencies with physical searches yield limited impact on combating contraband phones from reaching the hands of inmates Managed access provides a significant counter-measure that specifically targets cell phones that have been successfully smuggled into the facility

5. Increase in the number of monitored inmate conversations via landlines	<ul style="list-style-type: none"> • Decreases in the success rate of contraband cell phones leads to an increase of landline use by inmates This increase allows for more conversations to be monitored for investigative and evidentiary purposes
6. General deterrent of managed access to impact contraband cell phone market value	<ul style="list-style-type: none"> • Anecdotal evidence suggests managed access impacts the value of contraband cell phones within the facility If a phone is perceived to work only once or not at all, inmates will likely not invest in the device
7. Creation of a contraband cell phone unit within MSP	<ul style="list-style-type: none"> • By formally sanctioning and physically housing these habitual cell phone inmates, they can be more closely monitored as well as removed from the general population of inmates that may rely on them for access to a cell phone

Amendments to existing legislation governing contraband cell phones. At the time managed access was installed in MSP, the state’s criminal code guiding inmate possession of contraband was limited to traditional items such as weapons and drugs. In order to establish a legal precedent for inmates not to be in possession of a cell phone, as well as serve as a sanction-based deterrent, the Mississippi legislature amended the criminal code to include “cell phone” in the language. However, the legislation could be circumvented by parting out cell phone devices to ensure that one could not be found in possession of a fully-assembled cellular device. To remedy this issue, MSP officials solicited further assistance from the state legislature to amend the criminal code again to control for this technicality. In early 2012 the state legislation amended the criminal code to include the language “unauthorized electronic device” as well explicitly identifying “cell phone.” This criminal code also now specifies that possession of a cell phone within a correctional facility is a felony with a three to fifteen year sentence. The

revised and now current criminal code guiding contraband within MSP is as follows (last revised in early 2012):

“§ 47-5-193: Prohibitions generally: It is unlawful for any officer or employee of the department, of any county sheriff’s department, of any private correctional facility in this state in which offenders are confined or for any other person or offender to possess, furnish, attempt to furnish, or assist in furnishing to any offender confined in this state any weapon, deadly weapon, unauthorized electronic device, cell phone or contraband item. It is unlawful for any person or offender to take, attempt to take, or assist in taking any weapon, deadly weapon, unauthorized electronic device, cell phone or contraband item on property belonging to the department which is occupied or used by offenders, except as authorized by law” (State of Mississippi, 2012).

This lesson learned may seem to be a daunting task. However, based on communications with MSP personnel, this logistical and political process was streamlined with Global Tel Link, Tecore, legislators, and the various MDOC supervisors working together with minimal obstruction in order to implement the entire operation smoothly. MDOC noted that the state legislature had “consistently shaped laws and policy to meet our needs.” The linear nature of the chain of command from the state-level through to the managed access supervisors appeared to greatly assist this effort. Perhaps even more important was the perception of MDOC personnel that the state administration was “wide open to legitimate change, they want to be hands-on and proactive in solving this problem.” The Commissioner of MDOC in particular was credited for taking a proactive leadership role in streamlining the technology’s implementation.

Establish cooperative partnerships with cellular carriers. In the same vein, it was also found that cooperative partnerships between cellular commercial carriers, MSP, and MDOC officials have the potential to enhance the impact of managed access. Retrieving cell phone hardware or the entire device is the ultimate goal of contraband cell phone interdiction efforts but is not always possible. Through the detection of cell phone transmissions emanating from specific devices it is possible to permanently disable a cell phone on a commercial network. Personnel

at MSP and MDOC worked in collaboration with carriers to establish a process and set of evidentiary criteria to prove the use of a particular cell phone device from within MSP. With this evidence, MDOC and commercial carriers can request a court order to permanently disable the voice, text, and data transmission capability of a phone and/or de-authorize Subscriber Information Module (SIM) cards. This process described is very analogous to the “kill switch” approach under consideration in ongoing FCC proceedings.

Data on the frequency with which cell phone devices were permanently disabled are not available. Discussions with key informants and affiliated stakeholders suggested that while a cell phone could be disabled, the frequency in which this process is executed is rare. Additionally, it must be noted that contraband cell phones can still produce harms without a transmission capability. Managed access or similar technologies should not be relied upon as a substitute for physical device confiscations.

Cross-reference captured phone call information with existing pre-approved list of inmate landline numbers. In order for inmates to use the designated landline telephone system within MSP, they must first provide for approval, a list of up to ten telephone phone numbers they wish to call at any given time. MDOC personnel vet and if approved they are added to the inmates’ list of contacts contained in the landline phone system. Each inmate has a unique code they must enter when making a landline call. Once this unique code is entered, the inmate can only call contact numbers processed into the system. To ascertain if a particular cell phone was being operating from within MSP, transmissions intercepted by the managed access system are compared to inmates’ pre-approved landline call lists

If a call attempt is captured by the managed access system is placed to a number that is also in an inmate’s pre-approved contact list, it is assumed that the inmate has the contraband phone

in their possession or has information pertaining to the phone. Through this method, MDOC estimates approximately 90% of captured transmissions can be linked to MSP inmates. Given the quantity of data produced from the managed access system, it was noted that personnel resources limit use of this investigative method for day-to-day operations.

Managed access provides a layered approach for counter-measures beyond traditional search capabilities. The impact of managed access at MSP is perhaps best viewed through a layered approach. In this conceptual model, managed access provides two additional layers of safeguarding against cell phone use beyond traditional search protocols used in correctional facilities. Search activities involve sanction-based legal deterrents; physical pat-downs, metal detectors, dogs, and random search teams of inmate housing. With the exception of random cell searches, these attempts to combat contraband target offenders prior to a cell phone reaching the interior housing unit of a facility. A managed access system adds: 1) the capability to block cell phone transmissions originating or terminating within the facility, and 2) the potential to disable the transmission capability of a contraband device through collaboration with network carriers. It must be emphasized that sanctions and physical security are the foundation of counter-contraband efforts. Managed access technology should not be interpreted as an appropriate substitute for these efforts. Managed access is a supplemental technology to contraband and specific only to cell phones. This layered approach is illustrated in Figure 13.

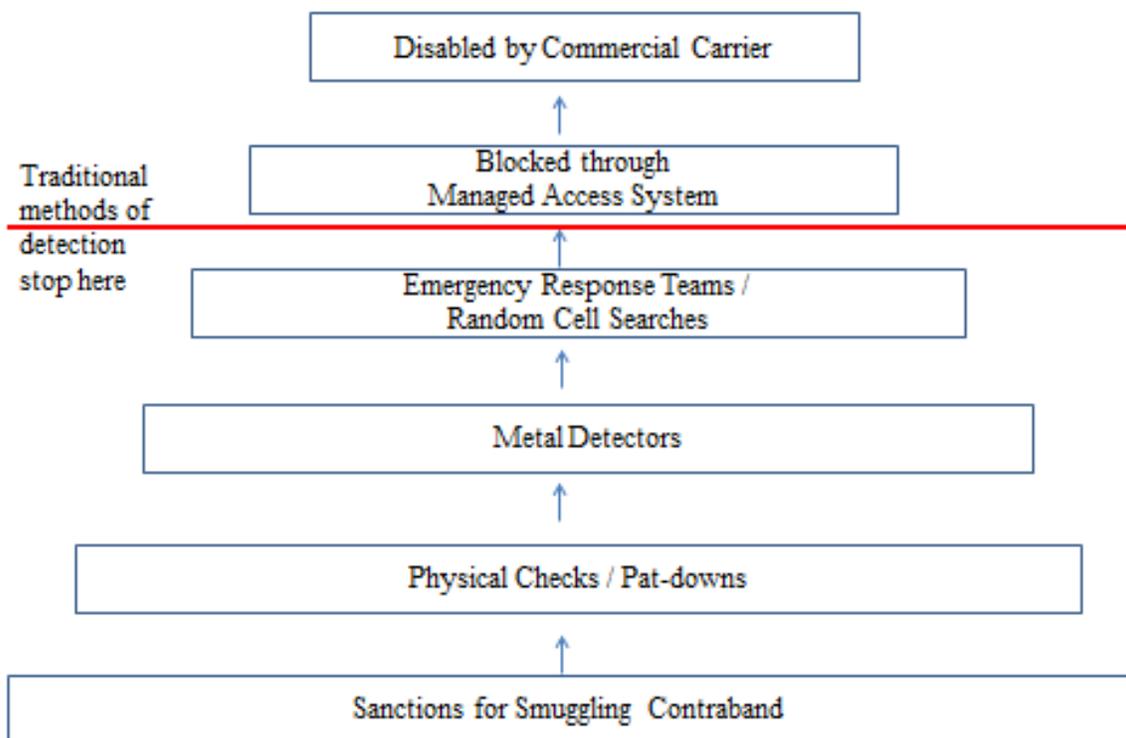


Figure 13. Layered Approach to Combat Contraband Cell Phones

Increase in the number of monitored inmate conversations via landlines. MDOC representatives believed the number of cell phones confiscated decreased as a result of the managed access system installation and associated revenue incurred from the inmate phone system. This suggests that installation of a managed access system increased inmate use of landline telephones to make calls. Aside from generating additional revenue for both the state department of corrections as well as the vendor, this increase in call activity via landline phones also leads to an increase in the number of conversations that are recorded and reviewed. Though MDOC officials could not determine the proportion of landline calls were later tied to criminal behavior, it seems apparent that by virtue of the increased land-line call volume there would be a

proportional increase in the number of inmate communications with evidentiary or investigatory value.

General deterrent of managed access to impact contraband cell phone market value. In addition to the anecdotal increases in landline calls, MSP personnel indicated that inmates have begun to recognize the effect of the system on the contraband marketplace within the facility. It is believed that as cell phone transmissions are blocked, inmates are less willing to spend hundreds of dollars to obtain a cell phone that cannot complete call or text transmissions.

Creation of a contraband cell phone unit within MSP. Lastly, one of the more interesting lessons learned at MSP was their creation of a special “contraband cell phone unit.” This unit was a stand-alone physical housing area for habitual cell phone users. As with general crime, it is believed the majority of cell phone use within prison results from a minority of the inmates engaged in the use of contraband cell phones. By formally sanctioning and physically housing these habitual cell phone inmates, they can be more closely monitored as well as removed from the general population of inmates that may rely on them for access to a cell phone.

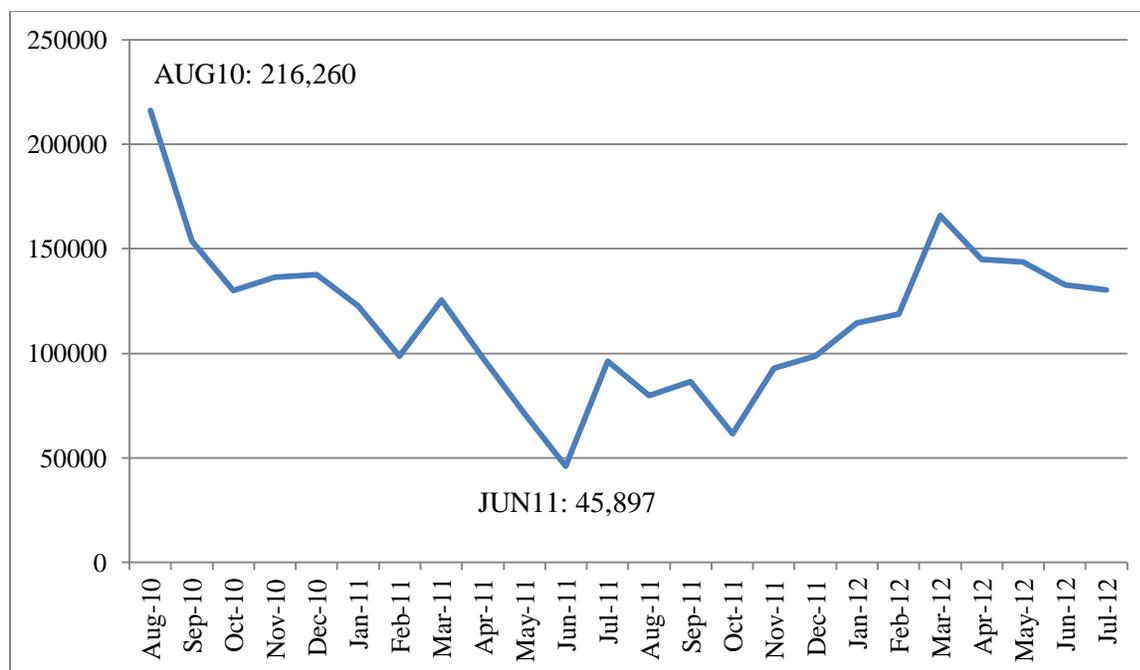
Inmates placed in this special unit lose privileges. Officials from MSP emphasized that correctional staff overseeing this unit were “hand-picked to avoid personnel who might have provided them with phones.” The MSP officials also explained that this approach is good in theory, but in practice it is difficult as the number of offenders that have repeat cell phone offenses is simply too large to assigning prisoners to the special cell phone unit. It appears this special unit is more of a temporary housing unit than a long-term solution to help remedy the problem. At the time of the research team site visit, MSP officials were discussing the need to identify what appropriate benchmarks would be for assigning someone to this special unit, such

as three or four violations before being admitted. At the time of this report writing, no determinations had been made with respect to such benchmarks.

Contraband Cell Phone Activity

Total Monthly Call Attempts from August 2010 Implementation through July 2012. On average, 116,754 call attempts (SD = 36,848.07) were made each month, with a median of 120,800 call attempts. The maximum number of call attempts detected occurred immediately after implementation in August 2010. Gradual decreases in detected call attempts were observed after implementation, with the managed access system detecting 45,897 call attempts in June 2011. The number of monthly detected call attempts decreased by 79% from August 2010 to June 2011.

Though it cannot be determined for certain, this dramatic decrease in call attempts captured by the managed access system is believed to have resulted from the rollout of 3G service from AT&T. Beginning in July 2011, the number of detected call attempts began to increase dramatically but did not return to the levels of detection observed in the first few months after implementation. The number of detected call attempts nearly doubled from June 2011 to July 2012. Acknowledging with the curvilinear U-shaped distribution of these data, there are linear and exponential decreases in the number of detected call attempts from August 2010 through July 2012. Figure 14 illustrates the distribution of these monthly call attempts.

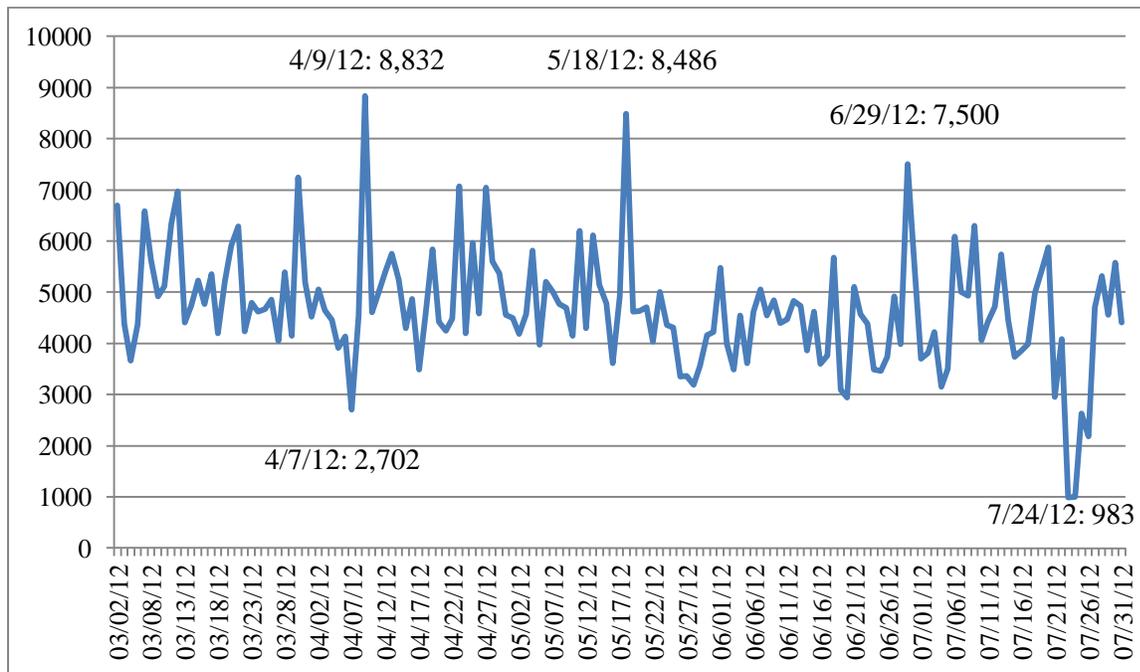


Source: Mississippi Department of Corrections, Managed Access System Data (Gleaned from Mississippi Department of Corrections, 2013)

Figure 13. Monthly Total Call Attempts Detected by MAS

Daily Call Attempt Volume March – July 2012. A total of 706,387 call attempts were detected from March 2012 through July 2012. It is important to note that this time frame is a period of gradual decline in monthly total call attempts after a peak in March 2012 (see Figure 14). The average number of calls per day is 4,678 (SD = 1,126.33), with a median value of 4,584 call attempts. The number of call attempts detected varied widely; ranging in value from 983 attempts on July 24th to 8,832 on April 9th (see Figure 15). Once again, there are linear and exponential decreases in the number of detected call attempts over time.

Examining some of the milestone or anchor dates within the available timeframe, the frequency of occurrence for connection attempts detected was substantially higher than average for Mother's Day (totaling to 6,110). This can be compared relative to the below average frequency of connection attempts detected for Easter Sunday (4,541), Father's Day (3,758), and Memorial Day (3,191).



Source: Mississippi Department of Corrections, Managed Access System Data

Figure 14. Daily Total Call Attempts Detected by MAS: Five Month Extract

Overview of Cellular Connection Measures Captured by Managed Access. The average cell phone device transmission detected by the system was a call (rather than a SMS text) using a Code Division Multiple Access (CDMA) radio system. Detected call attempts tended to occur between the hours of 8:00 a.m. and midnight, with noon to 3:59 p.m. representing the time frame of most frequent detected call attempts. Comparing the cellular frequency band, mobile network provider code by call attempt type reveals some baseline characteristics of detected call attempts. Detected call attempts show that voice calls are more likely to occur on CDMA radio systems, while SMS texts are more evenly distributed between GSM and CDMA technologies. Mobile network provider codes were also relatively similar. Unknown/unlisted call attempts detected by the system appeared to come from calls. A higher proportion of AT&T services were being used for SMS texts rather than calls. Tables 4-7 present counts for captured cellular call and text call attempts across different technology, cellular radio frequency, network carrier, and time of day.

It is important to contextualize the 40% of unknown/unlisted Mobile Network Codes observed in the data. The daily call attempt data provided by MDOC included International Mobile Subscriber Identity (IMSI) information captured by the managed access system, in standard format, from which the Mobile Network Code associated with the cellular service provider network could be derived. Unidentifiable or obsolete Mobile Network Codes were observed in the data (e.g., 006, 232, and 726) that could not be linked to a cellular service provider. The status of these MNCs remains unresolved. It is unclear if these codes are the result of device misconfiguration or some other use.

Table 4. Overview of Call Attempts by Type, Channel Access, and Mobile Network Code

	Frequency of Occurrence	Percent
Attempt Type		
Call	645,722	91%
SMS	60,665	9%
Channel Access		
CDMA	508,400	72%
GSM	197,987	28%
Mobile Network Code		
Verizon Wireless	220,633	31%
AT&T	171,034	24%
T-Mobile	27,292	4%
Mid-Tex Cellular	3,287	1%
Airadigm	115	<1%
Cincinnati Bell	1	<1%
Unknown/Unlisted	284,025	40%

Source: Mississippi Department of Corrections, Managed Access System Data

Table 5. Frequency of Call Attempt by Time of Day

Time of Day	Frequency	Percent
12:00-3:59 AM	26,616	4%
4:00-7:59 AM	80,704	11%
8:00-11:59 AM	140,146	20%

12:00-3:59 PM	179,098	25%
4:00-7:59 PM	155,212	22%
8:00-12:00 PM	124,611	18%

Source: Mississippi Department of Corrections, Managed Access System Data

Table 6. Channel Access by Call Attempt Type

Channel Access	Call Attempt Type	
	Call	SMS
CDMA	74%	47%
GSM	26%	53%

Source: Mississippi Department of Corrections, Managed Access System Data

Table 7. Mobile Network Code by Call Attempt Type

Mobile Network Code	Call Attempt Type	
	Call	SMS
Verizon Wireless	31%	37%
AT&T	22%	50%
T-Mobile	4%	3%
Mid-Tex Cellular	<1%	<1%
Airadigm	<1%	<1%
Cincinnati Bell	<1%	---
Unknown/Unlisted	43%	10%

Source: Mississippi Department of Corrections, Managed Access System Data

Connection Attempt Volume by Unique Cell Phones. All of the detected connection attempts were generated from 3,654 unique cell phone devices. These attempts equate to an average of 193.32 attempts per cell phone device (SD = 855.23). A median value of 11 connection attempts and mode of one call attempt was observed. Distribution of call attempts by cell phone device was not constant. Table 8 presents the frequency of occurrence of call attempts by unique device.

Table 8. Frequency of Occurrence Call Attempts by Unique Device

	Frequency Occurrence (%) of Total Call Attempts	Frequency Occurrence (%) of Cell Phones
Phone Used One Time	539 (<1%)	539 (15%)
Phone Used One to Two Times	1,151 (<1%)	845 (23%)

Phone Used One to Three Times	1,775 (<1%)	1,053 (29%)
Phone Used One to Four Times	2,571 (<1%)	1,252 (34%)
Phone Used One to Five Times	3,326 (<1%)	1,403 (38%)
Phone Used One to 10 Times	6,489 (1%)	1,811 (50%)
Phone Used 100+ Times	661,213 (94%)	771 (21%)
Phone Used 1,000+ Times	464,510 (66%)	153 (4%)
Phone Used 10,000+ Times	92,884 (13%)	7 (<1%)

Source: Mississippi Department of Corrections, Managed Access System Data

Of the 3,654 cell phone devices used, 15 percent (n=539) were used for one call attempt with no subsequent transmissions detected by the managed access system. The remaining 85 percent (n=3,200) of cell phone devices detected by the system were used more than one time. Most of the call attempts detected came from a small proportion of devices that were used frequently. Twenty-one percent of the cell phone devices used to make call attempts were responsible for 94 percent of the overall call attempts. Sixty-six percent of the total call attempts detected came from 153 cell phones devices, which were used more than 1,000 times. Seven devices were responsible for generating 10,000 or more call attempts. Preliminary analysis of one of the most used phones indicated series of stops and starts, with "blasts" of calls/texts within short timeframes to customer service lines and functional dial strings. However, note that this analysis was performed on a limited set of data that may or may not be representative, and we cannot derive any conclusion about the behavior of the phone or its user.

Average Cell Phone Lifespan. The data allowed for a determination of a device's lifespan. The difference in days between the date in which a device transmission was first captured by the system and the date in which the device transmission was last captured can be interpreted as how long a device had been used and detected by the managed access system. This analysis begins to dissect the aggregate trends and explore transmission patterns.

The average lifespan for the top seven devices used 10,000 or more times were estimated (see Table 9). As a reminder, the period of observation is March 2012 through July 2012 which

totals to 151 days. Average lifespan of these top seven phone devices in the observation period is 96 days (SD = 43.25), with median and mode values of 86 days.

Table 9. Cell Phone Lifespan by Unique Device

Device	Total Number of Transmissions	Lifespan (in Days)
A*	20,037	86
B*	15,074	129
C*	13,153	150
D	12,029	65
E	11,124	26
F*	11,053	130
G*	10,414	86
Mean (SD)	13,269 (3373.37)	96 (43.25)

The lifespan analyses allow for calculation of how long these devices were in use within the observation period. Asterisked devices in Table 9 identify devices with captured transmissions at the start or the end of the observation period. One of these five devices (Device C) was active at the start of this observation period, which means that this device was likely in use *before* March 2012. The remaining four devices (Devices A, B, F, and G) were active at the end of the observation period, suggesting these devices were likely in use *after* July 2012. In combination, these lifespans should be interpreted as very conservative estimates.

These analyses provide preliminary evidence that devices were both used at a relatively constant rate across the 151 day observation period to become one of the top devices used 10,000 or more times (see Devices B, C, and F) as well as a highly variable or non-constant rate (see Devices D and E) to amass a large number of transmissions. Unfortunately, no data was available to determine if device lifespans with clear first and last transmission dates (i.e., Devices D and E) is a function of devices being confiscated, destroyed, or simply lacking a battery charge. It is also possible that while these devices may no longer be detected by the managed access system, they still may be used for other purposes (e.g., audio and video recording).

Call Attempt Volume by Destination Number. A total of 30,835 unique destination numbers were dialed within the five month data sample. These numbers contain a mixture of functional strings (e.g., XXX-XXX-XXXX, 1-XXX-XXX-XXXX, or XXX-XXXX formats), SMS text shortcuts, and unusable numbers (e.g. *#72). The average number of times a destination number was dialed was 23 times (SD = 1,656.92), but this estimate is extremely skewed with a few numbers being dialed thousands of times. The median number of times a number was dialed is twice, with a mode of one. As indicated by Table 10, most of the destination numbers used were repeatedly dialed less than 10 times.

Table 10. Frequency of Occurrence of Call Attempts by Destination Number

	Frequency of Occurrence (%) of Numbers Dialed
Number Dialed One Time	13,058 (42%)
Number Dialed One to Two Times	18,193 (59%)
Number Dialed One to Three Times	20,833 (67%)
Number Dialed One to Four Times	22,607 (73%)
Number Dialed One to Five Times	23,820 (77%)
Number Dialed One to 10 Times	26,827 (87%)
Number Dialed 100+ Times	360 (1%)
Number Dialed 1,000+ Times	27 (<1%)
Number Dialed 10,000+ Times	7 (<1%)

Source: Mississippi Department of Corrections, Managed Access System Data

Call Attempt Volume by Top Destination Numbers. Table 11 presents the attempt frequency of occurrence of each number and a brief description of the number dialed for top 10 call attempts via cellular call. The most commonly attempted numbers called include a mix of services. These include a shortcut connection to wireless Internet access, a shortcut or 1-800 number to cellular provider customer service line, a variety of free, anonymous voicemail accounts, a chat line, pre-paid credit cards, and a 24/7 free service line where adults read children's books and the recording of stories is available on a constant loop.

A #777 dial string was used to provide a "tethered" data connection using 3G services. The #777 is used for Global System for Mobile Communications (GSM; affiliated with Verizon,

Alltel, and Sprint) and an analogous dial string for CDMA is #99xxxxx (affiliated with AT&T, Cingular, and T-Mobile). The #777 number was often (but not always) used in conjunction with a password that typically was the ten-digit cellular number associated with the phone service. It is interesting that the CDMA #99xxx number does not appear on this list as well. All of the Seattle, WA numbers are for voicemail services. This service provides users with free unique personal number that callers leave messages on and can listen to using the same number.

Table 12 presents the attempt frequency of occurrence of each number and a brief description of the number dialed for top 10 SMS text attempts. Texted phone numbers are far less concentrated than phone numbers called. For the most part, texts are being delivered to private numbers. During an open source Internet search of these numbers, many were openly listed on social networking profiles of individuals or electronic wanted ads of individuals or businesses. The most commonly texted number (1111340002) is associated with automated “robot” dialing. Based on open-source research, this specific number appears to be associated with a debt collection service. Why this number would be the recipient of inmate text messages is unknown.

Table 11. Top 10 Destination Numbers Called

	Frequency Occurrence (%) of Total Call Attempts	Description
#777	280,911 (44%)	Connect to wireless Internet
611	63,995 (10%)	Access customer service
(206) 208-XXXX	24,449 (4%)	Inactive voicemail account, Seattle (WA), International Telcom, Ltd.
(509) 676-XXXX	21,123 (3%)	1 to 1 chat line, Walla Walla (WA), Telewise
1-800-331-XXXX	11,995 (2%)	AT&T customer service
(206) 208-XXXX	11,702 (2%)	Inactive voicemail account, Seattle (WA), International Telcom, Ltd.

1-800-473-XXXX	10,926 (2%)	Green Dot MoneyPak customer service
1-800-473-XXXXX	9,445 (1%)	Misdial of Green Dot MoneyPak line (+1 digit)
(206) 208-XXXX	6,356 (1%)	Inactive laser voicemail account, Seattle (WA), International Telcom, Ltd.
(601) 482-XXXX	3,875 (1%)	Public Library Story Line, Meridian (MS), Bellsouth Telecomm Inc.

Source: Mississippi Department of Corrections, Managed Access System Data

Table 12. Top 10 Destination Numbers Texted

	Frequency of Occurrence (%) of Total SMS Attempts	Description
1111340002	1,401 (2%)	Access Integrated Services Digital Network
(662) 267-XXXX	781 (1%)	Private number, Batesville (MS), Sprint
(314) 225-XXXX	642 (1%)	Private number, Ladue (MO), New Cingular Wireless
(562) 618-XXXX	550 (1%)	Private number, Compton (CA), New Cingular Wireless
(601) 613-XXXX	348 (1%)	Private number, Jackson (MS), New Cingular Wireless
1-601-502-XXXX	328 (<1%)	Private number, Jackson (MS), Bellsouth Telecomm
(601) 529-XXXX	273 (<1%)	Private number, Vicksburg (MS), New Cingular Wireless
(901) 483-XXXX	270 (<1%)	Private number, Memphis (TN), Cellco Partnership/Verizon Wireless
(407) 403-XXXX	269 (<1%)	Private number, Orlando (FL), New Cingular Wireless
(318) 837-XXXX	265 (<1%)	Private number, Wisner (LA), New Cingular Wireless

Source: Mississippi Department of Corrections, Managed Access System Data

Note: These numbers represent the exact format in which numbers were dialed and captured.

Case Flow of Call Attempts: January to April 2012. Figure 15 provides an illustration of case flow processing of cell phone confiscations at MSP and among the remainder of MDOC's facilities. The overall trends identify two salient concerns for correctional administrators. First

is the confiscation-sanction gap. The number of cell phones confiscated exceeds the number of violation reports and prosecutions. Second is the gap between the number of cell phone devices available for use and the proportion that are confiscated. Noting that the data on the number of unique devices is only available for the months of March and April and likely underestimates the actual number of unique devices, it appears that only a small proportion of available devices are confiscated.

A few points of comparison can be made between MSP and all of the remainder of MDOC's facilities. MSP appears to have a slightly higher percentage of cell phones devices discovered on person relative to all other MDOC facilities. Contrary to this higher percentage of inmate possession of contraband cell phone devices, MSP has a lower proportion of cases moving forward with prosecution as compared to other MDOC facilities. It is also worthy to note that MSP appears to generate more rule violation reports and forward more cases to the local District Attorney net of the total number of cell phones confiscated. Since these de-identified data do not allow for determinations of individual case decisions at these phases, case flow trends for rule violation reports and forwarded cases must be interpreted with caution.

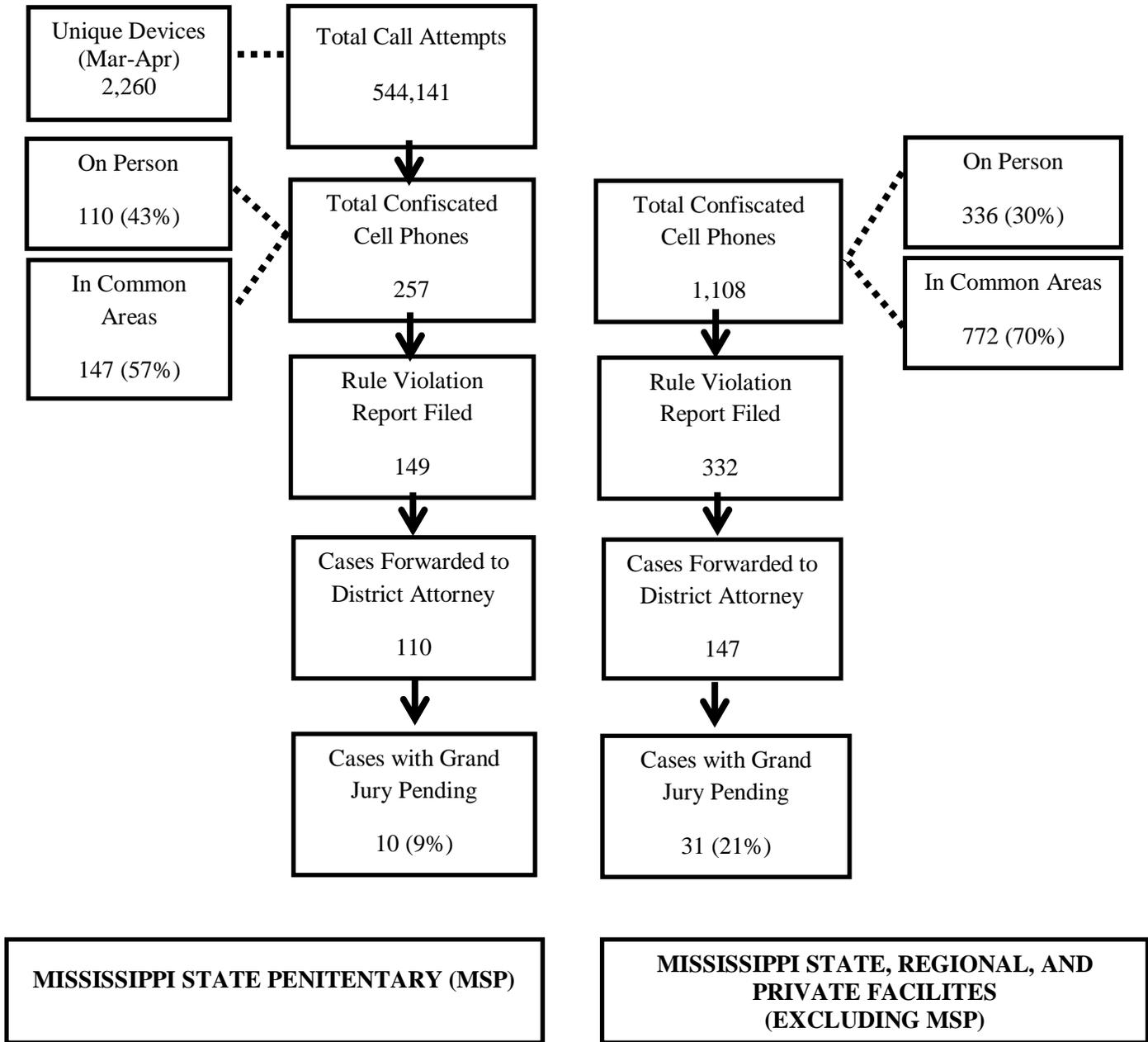


Figure 15. Case Flow Trends: January to April 2012

Discussion and Conclusions

The present research provides four unique insights. First, the contraband cell phone problem is perhaps more significant than imagined. One of the themes discussed throughout the site visit was the increase of inmate access to contraband cell phones from within correctional facilities. Based on the managed access system data, the median number of daily call attempts within MSP was 4,584. This can be extrapolated to estimate that 1,673,160 illegal cellular call attempts will occur in MSP alone in a single year.

Generally, the contraband cell phone problem has been illustrated to date by using the number of devices seized. The measurement of call attempts generated by the managed access system provides a useful alternative to understand the extent of contraband cell phone use. Moreover, call attempt data provides insight on the gap between estimated call attempts from unique cell phone devices and seized devices. While MSP is a relatively unique facility given its size, location, and history, the observed call attempt estimates may be similar across facilities with comparable rates of contraband cell phone confiscation within Mississippi and across other states.

Second, the managed access system at MSP does appear to work. That is, the system is able to detect and inhibit transmissions from cell phone devices within MSP. The system handles a large volume of call and text attempts and captures a variety of information that can be cross-referenced to facilitate subsequent administrative or investigative decision points. At the same time the extent to which managed access works is contingent on a number of system, personnel, and interagency cooperation and communication factors discussed throughout this report. If these elements are not actively managed, the ability to detect and inhibit cell phone transmissions can be dramatically reduced or lost altogether.

Relatedly, there is evidence to question the operational theory of managed access and what the system can provide correctional administrators. Perhaps the weakest proposition affiliated with managed access is the notion that such systems render cell phones as obsolete or useless. Managed access does not directly disable a cell phone by terminating voice, text, and data transmission capabilities and/or de-authorizing a SIM card. Instead, data generated from the managed access system is shared with commercial carriers to facilitate a court order to disable a cell phone. While feasible, this process is rarely pursued. Managed access does not ensure that once a cell phone is detected by the system the device is no longer used. The overwhelming majority (85%) of cell phones detected by the system were used more than one time and a small proportion of cell phones detected by the system attempted to transmit hundreds of call and/or text attempts. Managed access also does not appear to produce higher rates of cell phone confiscation relative to all other MDOC facilities. While call or text transmissions may be blocked by managed access, these devices do not seem to be discarded and subsequently confiscated by correctional personnel.

Third, managed access technology has operational shortcomings. As discussed, the technology requires active management on behalf of the adopting organization (see Tables 2 and 3 for a summary). Relatedly, the effect of the technology on the repeated use of cellular devices is not entirely clear. As noted, there were a small proportion of cell phone devices that were continuously used across a number of months to attempt calls and/or texts. These devices were responsible for a large portion of the total transmissions detected by the managed access system. These findings call into question how data generated from the system are automated and analyzed to produce actionable intelligence. The sheer volume of data produced as well as the mix of functional, misdialed, or erroneous dial strings may make it difficult to cross-reference

the destination number of contraband call attempts and inmates' pre-approved landline contact lists. The possibility does exist that this process could be automated to reduce the labor-intensive nature of cross-referencing numbers. However, such a process is likely to include specialized analytical skills, tools, and programming capabilities for translational comparison that may not be available to some corrections agencies.

Lastly, and perhaps most intriguing, the present research has shed light on unauthorized contraband cell phone activity. As specifically illustrated in Tables 11 and 12, a wide-range of communications are being attempted with contraband phones. Though the present research falls dramatically short of determining social support versus criminal coordination with these transmission attempts, it lends some empirical support for the use of contraband cell phones to fulfill an array of user needs which may not differ from cell phone users in the community (see Aoki & Downes, 2003). This is certainly not to say criminal activity does not occur through these contraband phones; it is almost certain that it does as well. However, these attempted calls or texts are not prospectively identifiable in the managed access system data.

The question is whether or not managed access is worth the financial investment. The answer to this question involves a myriad of complex issues and decisions. Managed access does capture a large quantity of cellular transmissions, but it is impossible to determine the rate with which attempted calls or texts successfully elude detection by the system. Even if a hypothetical rate of successful transmission detection was only 40 percent, that 40 percent would provide a substantial value-added effect to combating contraband cell phones problem relative to existing countermeasures. Thus, the decision comes down to this benefit versus the cost of installing and maintaining a managed access system.

Cost estimates are difficult to obtain for proprietary reasons. However, based on open-source information a significant monetary investment is required. Baltimore City Detention Center (BCDC) in Baltimore, Maryland implemented a managed access system. The technology will be deployed over 700,000 square feet of targeted area within the facility and utilize a full scope of commercial wireless spectrum (Tecore Networks, 2014). System costs are estimated at \$5.4 million (Washington Post, 2014).

Limitations

This research has a number of limitations and rests upon a variety of assumptions. To begin with, this study is exploratory in nature and sought to establish a foundation upon which future research on managed access can be conducted and practitioner decisions regarding the procurement and implementation of managed access technology could be based. Given the infancy of managed access technology and the sparsely available operational systems that can be evaluated, relatively limited information was available to guide the present research. Despite the limitations to be addressed here, the research has yielded a number of insightful and intriguing findings that will impact future practice and research.

Data limitations significantly hindered the study. Due to a number of unforeseen personnel changes within MSP and proprietary system concerns from the vendor which also owned the landline inmate calling system, an assortment of data was simply not available to the research team. Data was only available post-managed access system installation. Ideally the research team would have been able to collaborate with MDOC personnel to identify appropriate pre-installation measures related to contraband cell phone use at MSP. These metrics could have included inmate contraband and discipline reports, correctional staff discipline reports for smuggling cell phones, the type of cell phones confiscated, and survey and interview data from

inmates and staff at MSP regarding the prevalence of contraband cell phones, the catalysts behind inmates' use of these phones, and inmates awareness of MSP efforts to combat the use of cell phones. Without pre-implementation measures, it is difficult to determine the effect of managed access technology on correctional operations.

Data utilized by the present research is also limited in scope with regard to the temporal period examined. The managed access system became operational at MSP in August 2010, yet the available data utilized for secondary analysis only captured a five-month snapshot of a post-deployment period. The justification for utilizing this March – July 2012 time frame was 1) this time period is believed to be the most operationally-efficient of the system and 2) the tedious time-intensive process to clean and organize the data for analysis was significant. In addition, when the data from this time period is compared across previous post-deployment months (i.e., August 2010 to February 2012) there were no statistically significant differences in mean transmissions detected by the system. As such, the five-month snapshot data does not appear to be unrepresentative of broader monthly trends.

This research is unable to identify and distinguish whether attempted calls or texts captured by the managed access system are coming directly from inmates who are actively using contraband cell phones. The fundamental operational assumption of this technology – non-approved phone numbers that are intercepted and blocked are illegally made by inmates with contraband cell phones – could not be empirically examined. MDOC provided anecdotal estimates that 90 percent of attempted transmissions can be cross-referenced to pre-approved landline call lists and linked to MSP inmates, which increases the validity of managed access system data. At the same time, this estimate acknowledges measurement error that may be associated with the management of authorization lists and coverage leakage issues. There is also

some evidence to suggest that unauthorized call or text attempts may be made by a passive, automated process affiliated with cellular device hardware or software than user dialing. For example, earlier it was noted that #777 is a number dialed by a device to obtain data service from a wireless network. It is unclear if this number is manually dialed by a user seeking service or if the call attempts are from a cellular device programmed to continuously dial this number in search of service. It is possible that these call attempts are part of automated managed access coverage testing. Additionally, it is not clear if detected transmissions originate from users that have multiple cellular devices or from a user who possesses one Subscriber Identity Module (SIM) card that is shared among others with compatible cellular devices. The findings should be interpreted with these limitations in mind.

This assessment does not include information pertaining to costs. Any attempt to quantify costs related to system build out, maintenance, or ancillary expenses (i.e., personnel and training) was deemed to be invalid and unreliable. Cost and affiliated financial estimates were requested. However, the system deployed at MSP was not owned by the state. It is part of a service provided by the service vendor of the facility's inmate calling system. Therefore detailed cost information was not provided by this privately owned company. Moreover, managed access system cost factors will vary greatly by facility and the underlying cellular technology upon which a system operates. This case study provided a rural example whereby a single high-power cellular site provided coverage for the majority of the facility. The logistics associated with this type of installation are significantly different than a system using Distributed Antenna System technology (DAS), because DAS is based entirely on a network of low-power antennas distributed throughout the coverage area. The physical infrastructure required to support a DAS infrastructure is significantly more complex, and the associated costs to deploy will vary

significantly. DAS system manufacturers were/are hesitant to provide “budgetary” cost figures because of the significance of these differences. For this reason, cost estimates are not provided in this report. Given this high fidelity, any costs presented would likely not be generalizable.

Lastly, on-site engineering assessments were not a component of this project. The research team discussed such methodologies and determined that a number of system and facility-specific factors made any vulnerability assessment non-feasible. As an alternative, the research team employed social science process and outcome evaluation methods to describe how the managed access system operates, present information on implementation challenges, and explore and generate potential outcome metrics with the use of available administrative data.

Future research

It is beyond the scope of this study to take into account social factors contributing to the problem of contraband cell phones. The “why this is a problem” and “what are the root causes” questions cannot, unfortunately, be answered. As mentioned, the lack of privacy afforded to inmates via landline calls and the financial cost associated with these calls are plausible motivations for contraband cell phone use. However, further research is needed to explore the intention of calls conducted with contraband cell phones.

Relatedly, an exploration into the economics behind the contraband cell phone market could help quantify the problem and inform policy decisions. For example, if correctional officers and/or staff are smuggling phones for profit, it seems reasonable to assume that this cost is worth the risk of losing their legitimate job and facing likely criminal charges. Rational choice theory posits there should be an economic offset point where the proposed risk of smuggling is no longer intriguing to an employee and they could be deterred from engaging in such behavior.

Furthermore, the current research does not explore possible technical vulnerabilities a managed access system may have. The question begs; do inmates learn how to “beat the system?” Conversations with Global Tel Link and Tecore representatives revealed rumors of inmates circumventing managed access through a variety of different dialing mechanisms and cell phone setting specifications. Exploring these possible vulnerabilities will require a unique methodology and, likely, wide-ranging sample of inmates across different facilities. Consideration should be given to the examination of confiscated cell phones to identify what features have, and have not, been disabled by the managed access system.

From an engineering and technical perspective, signal coverage to include coverage holes and coverage bleed over, should be examined in varying contexts. The deployment at MSP poses limited risk of cellular interference to nearby legitimate cell phone users. The rural setting includes a modest buffer between MSP grounds and public areas. In addition, the density of commercial cell sites in a rural setting is lower than in a typical urban setting. Installation of a managed access system in an urban environment will face a more daunting task to control and isolate signal bleed over because of the higher density of commercial cell sites combined with a small or non-existent buffer between the correctional facility and nearby public areas.

Lastly, future research on contraband cell phones should attempt to quantify victimization. This is not a straightforward task. Media stories often retrospectively highlight the most serious of offenses when they occur, but conversations with corrections practitioners indicate a more pervasive victimization enabled through cell phones. An informed estimate of contraband cell phone victimization could help to justify investment costs in contraband cell phone technologies, including managed access.

Caution for the Corrections Community

The corrections community must understand that managed access is not – and should not – be considered a silver bullet solution for the contraband cell phone problem. Cellular devices that cannot transmit a call or text pose potential harm in the correctional environment. Managed access should be utilized in conjunction with physical search and seizures of contraband cell phones. As noted above, multifunction device capabilities that fall outside of the scope of cellular communications simply cannot be managed with managed access technology and have to be mitigated via other means. Managed access technology serves as a tool to mitigate use of these devices by denying cellular service, diminishing the overall utility of smuggling these devices into a correctional facility. Clearly inmate use of multifunction device capabilities which fall outside of cellular communications requires mitigation using non-managed access system methods, to include physical intervention. Put simply, managed access technology should be viewed as supplemental to existing contraband policies and practices.

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Appendix A: Examples of Contraband Cell Phone Activity

Contraband cell phones have been used for a variety of criminal activities inside and outside correctional facilities. While specific estimates of such activity have not been routinely collected or published, there is significant body of anecdotal evidence that the problem is widespread and poses a public safety problem. Table 13. illustrates some recent examples of alleged or noted criminal activities that have been associated with inmate use of contraband cell phones.

Table 13.Examples of Contraband Cell Phone Criminal Activity

State/ Country	Report Year	Criminal Act(s) Noted	Inside or outside prison	Reference URL
South Carolina	2010	Murder (attempted)	Outside	http://newsone.com/753345/prisoner-ordered-hit-outside-of-prison-with-smuggled-cell-phone/
Georgia	2011	Organized Inmate Uprisings	Inside	http://www.valdostadailytimes.com/local/x1331361164/Cell-phones-spark-Georgia-prison-unrest
North Carolina	2012	Kidnapping & Harass- ment	Outside	http://www.newsobserver.com/2014/04/11/3776630/kelvin-melton-imprisoned-for-life.html and/or http://www.theguardian.com/world/2014/apr/12/north-carolina-inmate-kidnapping-mobile-phone
Ohio (other locations mentioned)	2012	Multiple	Inside/ Outside	http://www.springfieldnewssun.com/news/news/cellphones-weapons-and-drugs-flood-ohio-prisons-1/nMySK/
South Carolina	2012	Smuggling, blackmail, harassment	Inside/ Outside	http://www.postandcourier.com/article/20120430/PC16/120439959 and http://www.postandcourier.com/article/20120430/PC16/120439971
Georgia	2013	Planning Violent Robberies	Outside	http://www.wsbtv.com/news/news/local/inmate-accused-planning-violent-crimes-prison/nXbw8/
Georgia	2013	Homicide	Inside	http://chronicle.augusta.com/news/2013-03-24/gangs-cell-phones-blamed-rise-homicides-georgia-prisons
Indiana	2013	Harassment	Outside	http://www.theindychannel.com/news/call-6-investigators/families-victims-targeted-by-indiana-state-prisoners-with-illegal-phones
Tennessee	2013	“violent crimes”	Outside	http://www.newschannel5.com/story/23631961/prisoners-confiscated-cell-phones-help-non-profit

State/ Country	Report Year	Criminal Act(s) Noted	Inside or outside prison	Reference URL
Georgia	2013	Prison Brawl Video	Inside	http://www.youtube.com/watch?v=C77wyuzh3oM
California	2014	Drug trafficking & Violent Crime	Outside	http://abc30.com/archive/9531064/
Maryland (Baltimore is men- tioned)	2014	Smuggling etc.	Inside/ Outside	http://www.city-journal.org/2014/24_2_baltimore-correctional-services-corruption.html
Florida (other locations mentioned)	2014	Multiple	Inside/ Outside	http://tbo.com/news/crime/prisoners-use-of-smuggled-cellphones-on-rise-20140216/
<i>International</i>				
Brazil (Baltimore is mention- ed)	2014	Murder	Outside	http://www.firstthings.com/web-exclusives/2014/04/prisoners-are-calling-whos-answering
Honduras	2014	Extortion	Outside	http://dialogo-americas.com/en_GB/articles/rmisa/features/regional_news/2014/05/30/honduras-seguridad

Appendix B: Semi-Structured Focus Group Protocol and Teleconference Protocols

Initial Focus Group Protocol – Mississippi Department of Corrections

Kick-Off: Introductions

- a. Who we are (introductions, roles, background)
- b. Overall charter and focus of NIJ
- c. Work in corrections and communications
- d. Assessment experience

1. Background of the project

- a. What motivated you to install the managed access system? Were there specific issues, a specific event, or general concern? Did you conduct a needs assessment or develop metrics to quantify the extent of the problem?
- b. What alternative approaches were implemented?
- c. What alternative approaches were considered?

2. System procurement

- a. How was the current system procured?
- b. What was the installation cost? Ongoing maintenance costs? Training costs? How are those costs funded?
- c. What was the timeline of procurement, installation, training, operation, etc.?

3. Technical operation of the system

- a. Physically view the system.

4. Operation of the managed access system

- a. Who installed the system? Who operates the system? How is the system maintained (hardware, software, data)?
- b. How are users trained?
- c. What are the relevant policies regarding cell phone use (employees, visitors)? How are these policies enforced?
- d. What is the criteria and procedure for classifying cell phones?

5. Operational impact

- a. What was your expectation for mitigating the issue that they were trying to address?
- b. What is your overall perception of system performance and impact?
- c. What would you change if you could (technical, policy, and legislative)?
- d. What data have you collected to date on system performance and system impact?

- e. Overall what data is collected? Is that data available for analysis? How can that data be accessed? Is there any data sets for which we can view representative samples at this time?
- f. How can we collect additional data if needed?

Debrief: Action steps for the future

Appendix C: Mississippi State Penitentiary Inmate Security Classifications

Security Level Classification	Definition
Minimum	Affords the offender a more relaxed atmosphere and extension of privileges and requires the ability to work satisfactorily with minimum supervision or security control.
Minimum: Community Minimum Status	Least security and supervision required of an offender. Usually this type offender works in the community.
Minimum: Non- Community Minimum Status	Least security and supervision required of an institutionalized offender and usually housed under minimum security circumstances. The offender may participate in activities on facility grounds without direct supervision, but must be supervised by trained correctional staff when off grounds.
Medium	Offender has displayed a desire to be considered responsible presents a moderate risk. Offenders are housed in a medium security facility and permitted to move about the housing unit or security work area, but are within direct observation of correctional staff. Offenders are under direct/constant armed correctional supervision when engaged in activities outside the perimeter of the correctional facility.
Close	Highest risk general population inmate and requires close supervision where the offender must be under positive security control at all times. The offender must be under armed supervision outside the perimeter.
Death Row	All male offenders sentenced to death in Mississippi are held in MSP's Unit 29.

Appendix D: MSP Managed Access System Infrastructure

The pictures included in this section were taken during a site visit made by the Engility team to the Mississippi State Penitentiary on May 31, 2012. These pictures are included to document specific aspects of the managed access installation.

As noted in the description of the installation, the system antennas were mounted on a water tower structure centrally located on the grounds of the MSP. Figure 16 shows the equipment shelter located at the base of the water tower structure. The equipment inside the shelter is shown in Figure 17, and the antennas, mounted on the structure, are shown in Figure 18

Figure 16. The MDOC Water Tower Equipment shelter



Figure 17. Equipment located in the MDOC Water Tower Equipment shelter



Figure 18. Antenna Equipment on the MDOC Water Tower

