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The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: Comment in the Matter of Rates for Inmate Calling Services,
WC Docket No. 12-375**

Dear Commissioner Genachowski:

On behalf of the American Bar Association (ABA) and its nearly 400,000 members worldwide, I write to submit the attached comments of the American Bar Association (ABA) in response to the Commission's Notice of Proposed Rulemaking on WC Docket No. 12-375, with respect to Inmate Calling Services (ICS).

For more than 25 years the ABA has steadfastly maintained that any limitations placed on "prisoners' communications should be the least restrictive necessary to serve the legitimate interests of institutional order and security and the protection of the public." Current, widespread practices of using telephone service contracts to fund unrelated prison budget areas are in violation of the ABA Standards on the Treatment of Prisoners and the Telecommunications Act of 1996. These practices are tearing families apart, and significantly conflict with and undermine more fundamental correctional policies aimed at promoting successful reentry and at reducing recidivism. Over the course of the FCC's lengthy proceeding on this matter, we have made multiple previous filings with the Commission.

We strongly commend the Federal Communications Commission for addressing changes to the rules governing rates for interstate interexchange inmate calling services (ICS). The FCC can play a substantial role in helping to correct these unethical practices by removing barriers to entry for competing telecommunications providers, barring site commissions, and enforcing caps on prison phone call rates.

Thank you for your consideration of our views.

Respectfully submitted,



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Attached Comments