

EXHIBIT 4

Reply comment on video visitation

Editorials criticizing video visitation

PRISON
POLICY INITIATIVE

Video prison visits – done right

YDR editorial board 9:18 a.m. EST January 29, 2016

York County Prison officials could learn from Westmoreland's mistakes and institute a less costly video visitation system.



(Photo: File)

When Westmoreland County installed computers last year to allow for video visitations for its prison inmates, the county had good intentions.

Or seemingly good intentions.

The notion, which seems on its face to be a good idea, is an example of good intentions gone awry for a variety of reasons.

The county last January installed a system that allows prisoners to visit via video with loved ones.

That in and of itself is a good idea, increasing and expanding options for families of prisoners for visits and bringing the prison into the 21st century.

It's good for families, and it helps those who find themselves locked up cope with being in jail. The law-abiding may not care about that, but it is in the prison's interest, for the sake of maintaining peace behind bars, that inmates are well-behaved and have incentive to stay that way.

It also increases security at the prison by reducing the traffic in and out of the jail, and it reduces the risk of visitors trying to smuggle contraband into the prison.

It would seem like something the York County Prison could look into.

But if York County does decide to follow Westmoreland County's lead, it should make some changes.

Westmoreland County Sheriff John Held cited the security benefits of the system, but the county commissioners had a slightly different view. They were seeking to increase revenue with the video visits, charging \$15 a visit.

That seems like a bad idea, charging families to visit loved ones in lockup. It's almost Dickensian in its cruelty to families seeking to stay connected to loved ones who run afoul of the law.

And it hasn't produced the kind of windfall the commissioners expected. The county earned \$14,000 from the visits. It had projected revenue of \$100,000.

The shortfall can be attributed to a number of things. [TribLive.com reported \(http://triblive.com/news/westmoreland/9859739-74/video-county-prison\)](http://triblive.com/news/westmoreland/9859739-74/video-county-prison) that many family members on the outside lacked access to computers and the secure, high-speed Internet connection necessary to complete the visits.

It could also be attributed to the county's seemingly draconian limits on visits. Before the video system was installed, inmates were allowed three half-hour-long visits with up to three people at a time a week. Inmates are now allowed one in-person visit a week and two 25-minute video visits.

TribLive.com quoted relatives of inmates saying it didn't seem fair to cut the in-person visits and to charge a fee for the video visits.

So the revenue was minuscule, compared to what the county expected. And it needed to make the cash. It had paid \$92,000 to a software company to install computers and web cams in the jail, and it hoped at least to make that money back.

That cost seems exorbitant. A few computers and web cams shouldn't cost that much. And hiring a company from Minnesota to do the work seems unnecessary. Couldn't the county's IT guys have done the job, running to Best Buy for equipment?

But we're thinking that York County Prison officials could learn from Westmoreland's mistakes and institute a less costly video visitation system.

Such a system could increase connections between inmates and families, helping foster their rehabilitation.

Consider using existing county IT workers to set up the system.

Don't look at it as a revenue source. Yes, inmates and families would have to be charged for the service – but not an exorbitant \$15 per video session fee.

Don't limit in-person visits. Allow families to make the decision whether to participate in the program without losing any visitation rights.

The lesson is that other counties can learn from Westmoreland County's errors.

And make sure that good intentions remain good.

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Austin American-Statesman

Friday, November 14, 2014

Breaking news at statesman.com

WE SAY COUNTY JAIL SYSTEMS

Make in-person jail visits an option

For many inmates in county jails awaiting trial, the days are long, lonely and stressful. For them, visiting with family is their only connection to the outside world. It is a connection that deserves as much protection as the right to private counsel. It is an act that needs to be safeguarded by those operating the jails.

And yet, the trend to do away with in-person visitation in order to make money for local county lock-ups has become all too popular. It is a movement that gives this board pause. It is a trend that needs to cease in Central Texas.

Many county jail inmates have not been convicted of a crime and do not have the resources to make bail before trial. While some who enter these local jails only stay a few days or weeks, many remain behind bars for months at a time. While inmates wait to appear before a judge, these individuals deserve to communicate with loved ones. Their families should not have to carry the burden of high fees intended as revenue for the county.

Last year the Travis County Jail completely did away with in-person inmate visitation. Instead, it now uses a video visitation system similar to Skype provided by Dallas-based Securus Technologies that costs families \$1 a minute to communicate with an inmate. That financial burden, we remind leaders, unfairly affects the largest population of incarcerated: the poor.

This week, Bastrop County jail followed with a similar system.

We ask both Travis and Bastrop county officials to reestablish face-to-face visitation in their jails. Reliance on the video system alone is more problematic than helpful.

Just last month, inmate advocates in Austin called on sheriff's officials



Last year the Travis County Jail did away with in-person inmate visitation and now uses a video visitation system similar to Skype that burdens families with costs. This week, the Bastrop County Jail followed with a similar system. LAURA SKELDING / AMERICAN-STATESMAN

to restore in-person visitation at Travis County jails, saying the video chatting system is costly for prisoners and their families and has not improved security as promoted. The advocates pointed to a recent study by the Texas Criminal Justice Coalition and Grassroots Leadership that showed overall increase in disciplinary infractions, assaults and contraband between May 2012 and April 2014 in the county jail.

Advocates say the results indicate conditions have worsened for prisoners. The findings are contrary to what

visitations protected under the Constitution. Advocates say the recordings were turned over to prosecutors.

Travis and Bastrop counties would do better if they instead emulate Dallas County's jail visitation system, which this week added video to available options which include pay phone and face-to-face visitation. Earlier this fall, Dallas commissioners rejected a plan that would have ended face-to-face visitation. Adopting a similar hybrid system in Travis and Bastrop counties would respect the rights of inmates and still produce revenue for the county.

In Travis County, the jail keeps 23 percent, or \$4.60 of every 20 minute, \$20 conversation logged using the video system. Bastrop's jail will get a 20 percent cut of their deal. Each system stands to make a lot of money for both counties. With their phone visitation alone, Dallas County reportedly received \$2.8 million in commissions through their contract with Securus. Travis County was unable to provide totals for the revenue it has received from the agreement.

In-person visitation has a public benefit. A 2011 Minnesota Department of Corrections study shows that visits from family and clergy reduce recidivism. These visits "can significantly improve the transition offenders make from the institution to the community." A single visit can lower the risk of a person to re-offend by 13 percent. When visitations are reduced or eliminated, recidivism increases, according to study.

Benefits to public and inmate safety, supports for fragile families and adherence to the Constitution are all important parts of the corrections equation. Travis and Bastrop counties should correct that balance.

The Boston Globe

TUESDAY, APRIL 28, 2015

Editorial

The Boston Globe

Founded 1872

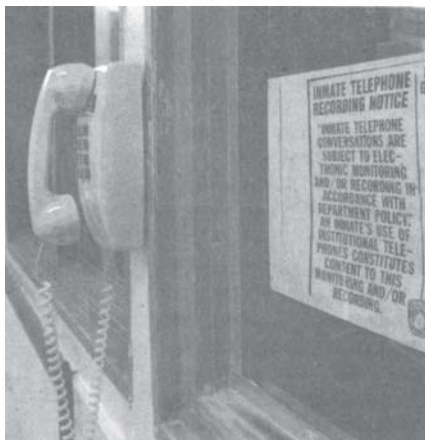
Phone rates for inmates exploitive, counterproductive

IT'S QUITE a business model: Charge predatory phone rates for a captive population that has no other communication options. In this case, the target population meets every definition of a captive audience: prison inmates, whose loved ones must pay 20 or 30 times normal rates for a phone call.

As The New York Times reported last month, the companies offering inmate phone calls, including those in Massachusetts prisons, can pay concession fees to prison and correctional facilities in exchange for getting exclusive contracts. These commission costs are then transferred to the customers in the form of phone charges that can run more than \$1 per minute. Almost half a billion dollars were paid in 2013 in such fees to prisons and state and local governments. Additionally, the phone companies impose high fees for opening, keeping, or closing a debit account. By any measure, this amounts to blatant exploitation of inmates' families.

In 2013, the Federal Communications Commission issued a report on the industry along with some long-awaited reforms, including a cap on the rate for an interstate prison collect call at 25 cents a minute. But the industry responded by increasing fees on intrastate calls, which represent the vast majority of all prison calls. The FCC is currently considering more restrictions, such as limiting or banning the concession fees and capping the intrastate and local prison phone calls.

Alarmingly, the industry is only expanding — and the FCC should pay close attention. Securus, the company that controls between 20 and 30 percent of the prison market, has been rolling out video visitation through a computer screen. The Prison Policy Initiative, an advocacy group based in Massachusetts, found that the service, at a cost of \$1.50 per minute, is nothing like the high-quality and affordable video technology of Skype and FaceTime. Not surprisingly, the service has drawn criticism and law-



ROBERT STOLARIK/THE NEW YORK TIMES

In 2013, almost half a billion dollars were paid in concession fees to prisons and state and local governments by companies offering inmate phone calls.

suits, some of those criticisms based on Securus's requirement that prisons eliminate face-to-face visits completely if they want to offer their video service.

Companies contend that any rate below 20 cents a minute would dramatically reduce their operating margins and compromise their ability to adequately monitor the calls for security purposes. But prison advocates recommend a maximum rate of 7 cents a minute, which would still allow the companies to run a sustainable business.

By paying exorbitant phone fees, families and friends of inmates are effectively subsidizing operating costs of local and state prisons. It's a flawed, counterproductive policy, and the FCC agrees: "Studies make clear that inmates who maintain contact with family and community while in prison have reduced rate of recidivism and are more likely to become productive citizens upon their release," according to a commission document. The law should reflect that finding, and remove a needless financial burden on inmates' families.

The Dallas Morning News

Texas' Leading Newspaper

\$1.50

Dallas, Texas, Tuesday, November 11, 2014

Phoning in the Punishment

County must not allow onerous jail call charges

Cinderblock walls, thick iron bars and an uncomfortable bed. Nothing says low-tech like a jailhouse.

Until recently, one of the few hints of modern technology was the addition of pay phone systems to facilitate contact between inmates and relatives on the outside. It didn't take long before county jails realized they could generate extra income by charging high fees to prisoners for telephone access. Dallas County now wants to add a video pay phone system, a potential convenience for prisoners whose relatives cannot visit, and also a big potential money maker for the county and contractor.

Since January, county commissioners have debated a proposal by Securus Technologies to install a video-call system in the county jail. We urge them to carefully weigh the pros and cons of this proposal and modifications offered by County Judge Clay Jenkins that will come up in the commissioners' meeting Tuesday.

Jenkins warns that contractors like Securus have a dubious track record. Wherever they've installed such video systems, he says, rules quickly follow to ban face-to-face jailhouse visits and to require all visitations to be done over income-generating video links. Indeed, commissioners rejected a proposal in September that would have eliminated in-person jail visits, and it's not part of Tuesday's proposal.

Some service providers have found a loophole, persuading jail operators to require those visiting in person to use a video link at the visitation facility. It's critical that commissioners not agree to any plan that would halt face-to-face visitations. The county should not be in the business of exploiting prisoners and their families to balance the budget.

Securus' original proposal offered video

Videophone compromise

County Judge Clay Jenkins plans to introduce a compromise Tuesday calling for:

- \$8 per 20-minute call, reduced from earlier \$10 proposal
- \$3 transaction fee, reduced from \$4.95 proposal
- Allowing county and Securus to recoup investment in first year of operation, curtail fees in subsequent years.

phone calls to inmates at \$10 per 20 minutes of usage, plus a per-call "transaction fee" of \$4.95. County commissioners rejected that deal in September. Jenkins plans to seek a compromise deal lowering the rate to \$8 per 20 minutes, with a transaction fee of \$3.

Jenkins' proposal would allow the county and Securus to recoup their investment in the first year of operation, but the fee structure would decline significantly in future years to curtail profiteering.

This newspaper has no problem with businesses making a profit off their services. However, we share Jenkins' concerns, not just about high charges but also the gross unfairness of imposing hefty fees on those least able to afford them: the poor who dominate the inmate population.

Studies, such as one by the Minnesota Department of Corrections in 2011, show that visitations are key to reducing recidivism. They help maintain the socialization and support networks that motivate prisoners toward rehabilitation. When visitations are curtailed, recidivism increases, the study says.

The idea should be to facilitate visitations rather than making them harder and more expensive. We hope Jenkins' compromise plan hits closer to that target.

HOUSTON★CHRONICLE
EDITORIALS

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Idea blackout

Paid video visits? Just a bad idea.



Lacy Atkins, Staff

Out of order phones sit in the visitation room on the 3rd floor of the San Francisco County Jail, which is slated to be closed and rebuilt in the coming years, Monday August 12, 2013, in San Francisco, Calif.

Copyright 2014: Houston Chronicle

September 12, 2014 | Updated: September 14, 2014 6:03pm

Have we become so addicted to technology that some people believe video communication is no different than being with your family in person? A three-year contract under consideration last week by the Dallas County commissioners proposed the installation of a video-chat system and the elimination of in-person visits for prisoners.

Advocates of the contract argued that video chats would save the families of prisoners the cost of gas, the time of travel, lost work time and spare them from having to stand in lines. By keeping visitors off-site, video chats would reduce security concerns and the need to screen and monitor visitors at the jail, as well as producing a brand-new revenue stream for the county. The video chats would cost \$10 per a 20-minute visit and would ultimately bring in millions for the county, according to County Judge Clay Jenkins as reported by the Dallas Morning News.

Opponents of the contract, which included Jenkins, pointed out that: In-person visits mean more to prisoners than video visits. In face-to-face visits, there are no time lag or camera problems; there's no risk the person in front of you will fade away into a dead signal; and it's easier to assess the mental and physical health of a loved one face-to-face than by video.

In order to ease prisoner re-entry, public officials should seek to strengthen the ties of an inmate with family and friends to provide a support for the rehabilitation of prisoners. We do not prepare convicted criminals for lawful lives by ensuring that other offenders will be their primary social group. And making money off the desire of prisoners to be in touch with family members and loved ones is offensive to basic concepts of morality. Thankfully, last Wednesday, the Dallas County commissioners rejected the videoconferencing contract. The commissioners asked for a re-bid that excluded the most offensive contract terms, such as the exclusivity of video visits and the payment of a commission to the county.



We're happy to note that according to Alan Bernstein, director of public affairs for the Harris County Sheriff's Office, Sheriff Adrian Garcia does not use video chats to make money off the poorest of the poor. Instead, the Harris County jail provides no-cost video chats for prisoners to talk with their lawyers. Currently, the county has no plans to tinker with family and friend in-person visitations.

Houston and Dallas have a friendly rivalry, but we're glad that we're together here. The proposed policy would have further isolated prisoners from a social support network. Both cities are better than that.

HEARST *newspapers*

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The New York Times

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MONDAY, OCTOBER 26, 2015

THE NEW YORK TIMES **EDITORIALS/LETTERS** MONDAY, OCTOBER 26, 2015

For Inmates, the Cost of Keeping in Touch

Families that have been forced to choose between buying household essentials and sharing a phone call with a loved one behind bars have long pleaded with the federal government to end price-gouging by the companies that provide phone service for jail and prison inmates.

The Federal Communications Commission took a preliminary step toward that end two years ago when it limited what those companies could charge for interstate telephone calls. On Thursday, the commission went one step further when it set limits on what the companies can charge on all inmate calls. There's one big task left: to apply similar rules to newer technologies — like email, voice mail and person-to-person video — which are subject to the same kinds of abuses found in the telephone industry.

There's little doubt that inmates who keep in touch with their families have a better chance of finding places in their communities and staying out of jail once they are released. But before the F.C.C. intervened, a call from behind prison walls could sometimes cost as much as \$14 per minute. Thursday's order sets a cap of 11 cents per minute for all local and long-distance calls from state and federal prisons. This means an average (and much more affordable) rate of no more than \$1.65 per 15 minutes for a vast majority of intrastate and interstate calls.

Prisoners' families, who pay for these calls, are among the poorest in the country. The new system will al-

low them to keep in touch without going broke. But the F.C.C. ruling does not get to a fundamental problem: Inmate telephone costs are partly driven by a "commission" — essentially a legal kickback — that phone companies pay corrections departments. The commissions are calculated as a percentage of revenue, or a fixed upfront fee, or a combination of both.

Several members of Congress recently sent a letter to the F.C.C. urging it to ban the commissions. It is unclear whether this is within the agency's power, which means congressional action might be needed. But the members were right when they said that the exploitation of inmates is clearly a human rights issue.

The F.C.C. is now seeking public comment on whether similar caps should be placed on new technologies. These include for-profit video systems like those that allow families and inmates to communicate using personal computers outside the prison and video terminals inside the prison. The answer should be yes.

A report this year by the Prison Policy Initiative, a Massachusetts research and advocacy group, found that jails and private companies were conspiring to shut down traditional face-to-face visits in order to force families to use the computers. This is the same kind of perverse incentive that led to price gouging in traditional telephone services.

Video jail visits / Technology has advantages, but keep the in-person option

Posted: Thursday, June 4, 2015 12:01 am

Digital technology that has changed so much is going to jail - not to be punished, but to bring the same ambivalent "progress" it has brought to many industries and personal life.

Jails and prisons across New Jersey are adopting video visitation for family members and friends. That's a good option, but inadequate as their only access.

At the Cape May County jail, a pioneer of video visits starting in 2011, visitors sit at one of three video terminals and chat with the live image of the inmate inside.

The county charges the inmates or their visitors \$10 for 20 minutes of such video chat, and pockets half of that. The county's sheriff, Gary Schaffer, says video visitation makes security easier for his staff, since the inmates don't need to be moved from within the secured part of the jail. He said video visits are responsible for reducing assaults on jail officers from nearly 30 a year to almost none.

For these reasons, apparently, Cape May County has eliminated the ability of families, friends and others to visit an inmate in person. All "visits" are limited to seeing each other on a computer screen.

Other institutions have adopted video visits as an option, giving visitors and inmates the choice of video chat or actually seeing each other.

Warden Robert Balicki, whose Cumberland County jail offers both visitation methods, has seen the benefits. "I think you should still have in-person visits," he told The Press recently. "The video visit is not the same. You can give them a hug before the visit and after the visit."

As video visitation has spread to more than 500 prisons and jails in 43 states, complaints have grown from families who say prohibiting seeing an inmate in person weakens bonds that need to be maintained - especially with young children.

The U.S. Department of Justice is starting to address the shift in visitation. Its National Institute of Corrections issued a report in December urging jails and prisons considering video visitation to "consider the proven benefits of traditional visiting, the limitations of video visiting, the needs of each facility, the goals of the correctional administration, and the laws, regulations and political realities of the region. Video visiting cannot replicate seeing someone in-person, and it is critical for a young child to visit his or her incarcerated parent in person to establish a secure attachment."

In his preface to that report, institute acting Director Robert M. Brown Jr. said correctional facilities

should "introduce video visiting as a resource, ideally in concert with in-person visitation."

This newspaper agrees with the developing federal view that video visitation makes a good addition to the ways inmates can stay connected with the world to which they'll return, but only as another option. Families, friends and attorneys must have the ability to see an inmate in person for communication that is unimpeded by technology. That's not only fair to the people involved, but serves the important societal interest in the rehabilitation of inmates.

Given that limiting families and inmates to only teleconferences might be more convenient, safer and even money-making for correctional institutions, this decision can't be left to local officials. We urge New Jersey legislators to enact a law ensuring visitors will continue to have the ability to see inmates in person.

street roots

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WEEKLY JAN. 23-29, 2015 STREETROOTS.ORG

County should preserve in-person visitation

In a time when prison reform looks to be gaining momentum in Oregon and around the country, Multnomah County, one of the nation's most liberal counties, is headed in the wrong direction.

As reported by Street Roots earlier this month ("Captive consumers," Street Roots, Jan. 2), and in this

week's edition (Revisiting visitation, pg. 4), Multnomah County Sheriff's Office has signed a contract with Securus Technologies Inc.,

agreeing to replace all

family and friend in-person visits at county jails with the Texas-based company's video-visiting service.

Securus is one of three private companies drawing revenue from people who are incarcerated in Multnomah County. TouchPay GenPar, also a Texas-based company, draws money from fees placed on inmate account deposits. And Numi Financial turns a profit from the transactions on debit cards – cards that are issued to every individual who is arrested and detained in the jail and used to reclaim his or her personal cash.

Securus is contracted with 2,600 facilities in 46 states. It boasts that it has paid \$1.3 billion in commissions to correctional facilities over the past 10 years. In 2009, the last year financial information was made publicly available, Securus brought in more than \$363 million in revenue.

To add insult to injury, Street Roots reported that long before Multnomah County signed a deal with Securus Technologies for its video-visiting system, the

prison communications leader had already been pulling in millions of dollars from Multnomah County inmates and their families for years from high fees on collect calls.

In Multnomah County, Securus charges \$5.43 for a 15-minute local call. The commissions made by the county from phone calls go into the Inmate Welfare Fund, which was set up to pay for activities and services that benefit inmates. But over the past two fiscal years, \$92,521 was taken out of the Inmate Welfare Fund to

pay for other things on the county's agenda, such as an Eastside Streetcar assessment. The Inmate Welfare Fund was one of only a handful of funds diverted as part of a supplemental budget both years.

Multnomah County should renegotiate the contract with Securus to allow for in-person visitation. A U.S. Department of Justice report released in December states: "Incarcerated individuals have better outcomes when they receive in-person visits from family members and supportive community members."

The DOJ says that while video visiting can help to keep children in contact with their parents, it has the greatest benefits when it is used in addition to in-person visits, not as a replacement. We couldn't agree more. We have to preserve in-person visitation.

Moreover, Multnomah County shouldn't be using money made from inmates and their families to support projects outside of the jail. That's an end-run to a poor man's tax. The money made off of inmates should back toward programs that offer inmates the opportunity to be successful both inside the jail and upon release.

EDITORIAL

Securus is one of three private companies drawing revenue from people who are incarcerated in Multnomah County.

The Washington Post

The Post's View

D.C. prisoners deserve better than flawed video-only visitation policy

By **Editorial Board** August 12, 2013

LAST YEAR the District's Department of Corrections [replaced in-person visits](#) to the D.C. jail with a video-only visitation policy. Although it was couched as a means of improving the convenience of the visiting process and increasing the frequency of visits, the policy, as we've said before, was ultimately a regrettable decision whose only real effect has been to punish prisoners and families.

In the 11 months since its implementation, the allegedly convenient video visitation policy has not, as critics have pointed out, been expanded to the promised seven days per week; family and friends still have to fit their visits into the old eight-hour, five-day-per-week time frame. Visitors complain of poor quality on the jail's monitors, and some have even experienced cancellations of scheduled appointments because of slightly late arrivals. While it's true that prisoners are technically allowed more visits than they were before — two 45-minute sessions rather than one per week — the system isn't working as it should.

Of course, the problems with video visitation are more than logistical. If prisons are to function as correctional facilities, there's next to no evidence that video visitation provides the human encouragement and maintenance of family ties of in-person contact. The [Minnesota Department of Corrections](#) concluded that offenders who were visited in prison were 13 percent less likely to receive another felony conviction and 25 percent less likely to be reincarcerated for violating parole. Given that [about half](#) of the District's 8,000 prisoners released each year end up in prison within three years of their release, it's unclear why the jail would turn its back on a visitation policy with documented potential to assist in rehabilitation.

The D.C. Council is considering a measure that would improve the situation. The [Video Visitation Modification Act](#) would essentially maintain the basic structure of video visitation instituted last summer but would also allow for in-person visits at a marginal cost of just about \$600,000 to the District, which ended the last fiscal year with upwards of [\\$400 million in budget surplus](#).

After the [Baltimore jail scandal](#) in April, where guards colluded with a gang of prisoners to facilitate contraband transactions, critics of the District's proposed measure have understandably cited security as a major concern.

However, there's little evidence that in-person visits are the direct cause of inmate-on-guard assaults. While stopping the flow of contraband is a key concern, so is treating prisoners as humanely and compassionately as possible. There's no reason why the former should rule out the latter.

Read more on this topic:

[The Post's View: Virtual visits for inmates?](#)

[The Post's View: Troubling trend of suicides in D.C. jail](#)

[The Post's View: D.C. jail death of Paul Mannina raises many questions](#)
