

Statement of Estimated Regulatory Costs

Department: Florida Department of Corrections
Rule Number: 33-210.101, F.A.C.
Rule Description: The proposed rule establishes the protocols for processing routine mail electronically and updates the regular routine mail process. FDC's decision to digitize inmate routine mail and prohibit stamps being sent in is to prevent the introduction of illegal drugs and substances through the routine mail process. FDC has experienced multiple incidents of staff illnesses resulting from contact with Fentanyl and Suboxone, as well as inmate deaths and illnesses requiring emergency medical treatment from the consumption of dangerous drugs. Like Florida, other states and jurisdictions have experienced similar problems related to drugs and weapons being sent through routine mail and have switched to a digitized mail platform or are simply making photocopies of the mail to give the inmate. From January 2019 to April 2021, FDC staff discovered over 35,000 contraband items, such as fentanyl/oxycodone, cocaine, heroin, K2 (synthetic cannabinoid), methadone (bath salts), methamphetamine, marijuana, narcotic pills, suboxone, cell phones, ammunition, weapons, hidden in the mail.

Contact Person: Richard Comerford, Assistant Deputy Secretary of Institutions, 501 South Calhoun St., Tallahassee, FL 32399, Richard.Comerford@fdc.myflorida.com

Please remember to analyze the impact of the rule, NOT the statute, when completing this form.

A. Is the rule likely to, **directly or indirectly**, have an adverse impact on economic growth, private-sector job creation or employment, or private-sector investment in excess of \$1 million in the aggregate within 5 years after the implementation of the rule?

1. Is the rule likely to reduce personal income? Yes No
2. Is the rule likely to reduce total non-farm employment? Yes No
3. Is the rule likely to reduce private housing starts? Yes No
4. Is the rule likely to reduce visitors to Florida? Yes No
5. Is the rule likely to reduce wages or salaries? Yes No
6. Is the rule likely to reduce property income? Yes No

Explanation: The rules will not directly or indirectly have an adverse impact on economic growth, private-sector job creation, private sector employment or private-sector investment, as the changes in the proposed rule will only affect how sent physical mail is distributed to inmates.

If any of these questions are answered “Yes,” presume that there is a likely and adverse impact in excess of \$1 million, and the rule must be submitted to the legislature for ratification.

B. Is the rule likely to, **directly or indirectly**, have an adverse impact on business competitiveness, including the ability of persons doing business in the state to compete with persons doing business in other states or domestic markets, productivity, or innovation in excess of \$1 million in the aggregate within 5 years after the implementation of the rule?

1. Is the rule likely to raise the price of goods or services provided by Florida business?
 Yes No
2. Is the rule likely to add regulation that is not present in other states or markets?
 Yes No
3. Is the rule likely to reduce the quantity of goods or services Florida businesses are able to produce, i.e. will goods or services become too expensive to produce?
 Yes No
4. Is the rule likely to cause Florida businesses to reduce workforces?
 Yes No
5. Is the rule likely to increase regulatory costs to the extent that Florida businesses will be unable to invest in product development or other innovation?
 Yes No
6. Is the rule likely to make illegal any product or service that is currently legal?
 Yes No

Explanation: The rules do not have a direct or indirect adverse impact on business competitiveness, as the changes in the proposed rule will only affect how sent physical mail is distributed to inmates.

If any of these questions are answered “Yes,” presume that there is a likely and adverse impact in excess of \$1 million, and the rule must be submitted to the legislature for ratification.

C. Is the rule likely, **directly or indirectly**, to increase regulatory costs, including any transactional costs (see F below for examples of transactional costs), in excess of \$1 million in the aggregate within 5 years after the implementation of this rule? No.

- | | |
|---------------------------|---|
| 1. Current one-time costs | 0 |
| 2. New one-time costs | 0 |
| 3. Subtract 1 from 2 | 0 |

4. Current recurring costs	0
5. New recurring costs	0
6. Subtract 4 from 5	0
7. Number of times costs will recur in 5 years	N/A
8. Multiply 6 times 7	0
9. Add 3 to 8	0

If 9. is greater than \$1 million, there is likely an increase of regulatory costs in excess of \$1 million, and the rule must be submitted to the legislature for ratification.

D. Good faith estimates (numbers/types):

1. The number of individuals and entities likely to be required to comply with the rule. *(Please provide a reasonable explanation for the estimate used for the number of individuals and methodology used for deriving the estimate).*

Approximate Number of Inmates in the Florida Department of Corrections- 80,000

Approximate Number of Entities/Individuals Who Mail Parcels to the Department of Corrections- Exact number is undeterminable, as the Department does not maintain statistics related to mail volume. A realistic estimate is 323,000, which is the approximate number of people currently on inmate visitor lists.

2. A general description of the types of individuals likely to be affected by the rule.

The individuals primarily affected by the rule will be inmates of the Florida Department of Corrections. If the rule is adopted, inmates will receive scanned versions of physical mail directly to their tablets rather than receive the physical pieces of mail. It is important to note that all eligible inmates receive a tablet at no cost to the inmate (please see rule 33-602.900, F.A.C.). Outgoing mail from inmates will not be affected by this proposed rule, nor will legal mail, nor will publications governed by the admissible reading rule (rule 33-501.401, F.A.C.).

Entities who mail parcels/letters to inmates will be minimally affected.

E. Good faith estimates (costs):

1. Cost to the department of implementing the proposed rule:

None. The department intends to implement the proposed rule within its current workload, with existing staff. JPAY will be responsible for the costs of printing mail for any inmates, who because of their housing status, do not have access to kiosks or tablets.

Minimal. *(Provide a brief explanation)*

Other. *(Please provide a reasonable explanation for the estimate used and methodology used for deriving the estimate).*

2. Cost to any other state and local government entities of implementing the proposed rule:

None. This proposed rule will only affect the department.

Minimal. *(Provide a brief explanation)*.

Other. *(Please provide a reasonable explanation for the estimate used and methodology used for deriving the estimate).*

3. Cost to the department of enforcing the proposed rule:

None. The department intends to enforce the proposed rule within its current workload with existing staff. Mail management is part of the Department's contract with the contractor, JPAY, Inc. The process is included in Contract #C2885, Amendment #2, and provides as follows:

The Contractor will work with the Department to finalize, document, and implement a mail management solution[...] The Contractor shall receive all physical mail sent to Department inmates at a Contractor-operated site (excluding Legal/Privileged Mail), digitize it, and transmit it to the inmate's JPay email account[.]

See Section II, F., 4. of the Department's #C2885 Contract with JPAY as revised by Amendment #2 in November of 2019. Per Contract #C2885, the cost of implementing a mail management solution is being borne by the vendor, not the Department. The above language is part of the contractual agreement with the vendor and no costs are added to the Department for implementation or management of the proposed system.

Minimal. *(Provide a brief explanation)*.

Other. *(Please provide a reasonable explanation for the estimate used and methodology used for deriving the estimate).*

4. Cost to any other state and local government of enforcing the proposed rule:

None. This proposed rule will only affect the department.

Minimal. *(Provide a brief explanation)*.

Other. *(Please provide a reasonable explanation for the estimate used and methodology used for deriving the estimate).*

F. Good faith estimates (transactional costs) likely to be incurred by individuals and entities, including local government entities, required to comply with the requirements of the proposed rule. *(Includes filing fees, cost of obtaining a license, cost of equipment required to be installed or used, cost of implementing processes and procedures, cost of modifying existing processes and procedures, additional operating costs incurred, cost of monitoring, and cost of reporting, or any other costs necessary to comply with the rule).*

None. This proposed rule will only affect the department.

Minimal. *(Provide a brief explanation).*

Individuals and entities whom mail parcels/letters to inmates may be minimally affected. Pursuant to the Rule 33-210.101, effective as of May 25, 2016, written correspondence could be an unlimited number of pages, while additional written attachments/enclosures were limited to 15 pages. *See* r. 33-210.101(2)(a)-(b), F.A.C.

The proposed rule, pursuant to the Notice of Change published on September 7, 2021, allows for 15 pages to be sent, with writing allowed on both sides of pages. As such, only individuals and entities that had mailed more than 15 pages of correspondence, as opposed to attaching documents, will be affected. The exact number of people who send correspondence of more than 15 pages (30 pages of written material, since content is allowed on both sides of a page) is undeterminable, as the Department does not maintain statistics related to mail volume. Nevertheless, although the volume is undeterminable, it is important to note that the effect will still be minimal, as the rule in no way prohibits multiple mailings. More than 15 pages could still be sent to inmates, but just in different parcels.

Other. *(Please provide a reasonable explanation for the estimate used and methodology used for deriving the estimate).*

G. An analysis of the impact on small business as defined by s. 288.703, F.S., and an analysis of the impact on small counties and small cities as defined by s. 120.52, F.S. *(Includes:*

- *Why the regulation is needed [e.g., How will the regulation make the regulatory process more efficient? Required to meet changes in federal law? Required to meet changes in state law?];*
- *The type of small businesses that would be subject to the rule;*
- *The probable impact on affected small businesses [e.g., increased reporting requirements; increased staffing; increased legal or accounting fees?];*
- *The likely per-firm regulatory cost increase, if any).*

A small business is defined in Section 288.703, F.S., as “...an independently owned and operated business concern that employs 200 or fewer permanent full-time employees and

that, together with its affiliates, has a net worth of not more than \$5 million or any firm based in this state which has a Small Business Administration 8(a) certification. As applicable to sole proprietorships, the \$5 million net worth requirement shall include both personal and business investments.”

A small county is defined in Section 120.52(19), F.S., as “any county that has an unincarcerated population of 75,000 or less according to the most recent decennial census.” And, a small city is defined in Section 120.52(18), F.S., as “any municipality that has an unincarcerated population of 10,000 or less according to the most recent decennial census.”

The estimated number of small businesses that would be subject to the rule:

- 1-99 100-499 500-999
 1,000-4,999 More than 5,000

Unknown, please explain: All small businesses that send parcels to inmates will be minimally impacted. It is unknown how many small businesses this will be, as the Department has no control over what entities decide to send in mail. However, this rule amendment does not impact publications subject to FDC’s admissible reading rule, r. 33-501.401, F.A.C.

Individuals and entities whom mail parcels/letters to inmates may be minimally affected. Pursuant to the Rule 33-210.101, effective as of May 25, 2016, written correspondence could be an unlimited number of pages, while additional written attachments/enclosures were limited to 15 pages. *See* r. 33-210.101(2)(a)-(b), F.A.C.

The proposed rule, pursuant to the Notice of Change published on September 7, 2021, allows for 15 pages to be sent, with writing allowed on both sides of pages. As such, only individuals and entities that had mailed more than 15 pages of correspondence, as opposed to attaching documents, will be affected. The exact number of people who send correspondence of more than 15 pages (30 pages of written material, since content is allowed on both sides of a page) is undeterminable, as the Department does not maintain statistics related to mail volume. Nevertheless, although the volume is undeterminable, it is important to note that the effect will still be minimal, as the rule in no way prohibits multiple mailings. More than 15 pages could still be sent to inmates, but just in different parcels.

There is no small county or small city that will be impacted by this proposed rule.

A small county or small city will be impacted. Analysis:

Lower impact alternatives were not implemented? Describe the alternatives and the basis for not implementing them.

H. Any additional information that the agency determines may be useful.

None.

Additional.

- I. A description of any good faith written proposal for a lower cost regulatory alternative to the proposed rule which substantially accomplishes the objectives of the law being implemented and either a statement adopting the alternative or a statement of the reasons rejecting the alternative in favor of the proposed rule.

No good faith written proposals for a lower cost regulatory alternative to the proposed rule were received.

See attachment “A” (Emails in Attachment “A” all have the same information, and as such, will be evaluated together).

Adopted in entirety.

Adopted / rejected in part. *(Provide a description of the parts adopted or rejected, and provide a brief statement of the reasons adopting or rejecting this alternative in part).*

Rejected in entirety. *(Provide a brief statement of the reasons rejecting this alternative).*

According to Section 120.541(1)(a), F.S., a lower cost regulatory alternative may include the alternative of not adopting any rule if the proposal explains how the lower costs and objectives of the law will be achieved by not adopting any rule. The emails in Exhibit “A” do not attempt to describe how this “alternative” will achieve the objectives of the law being implemented as currently proposed by the Department. It is impossible to do so, as maintaining the current effective version of the rule does nothing comparable to the amendments proposed by the Department to decrease the documented problem of dangerous drugs and weapons being sent through routine mail. The Department’s decision to digitize inmate routine mail is based on the safety of staff and inmates. From January 2019 to April 2021, over 35,000 contraband items were discovered in routine mail. Extremely dangerous substances such as liquid chemicals used to lace synthetic marijuana can be soaked into paper and dried, making detection very difficult. Likewise, often deadly narcotics such as fentanyl present a danger to staff who must handle and inspect the mail and the inmate who ultimately receives it.

Nevertheless, the Department has decided to evaluate the alleged “lower cost regulatory alternative” received, and responds as follows:

1. Argument that “Man Power and Administration Costs” will be more than \$200,000 in the First Year
 - a. Regulatory costs are costs to regulated individuals and entities, not the Department. As such, all alleged costs to the Department of Corrections in terms of manpower and administration are irrelevant to the Department’s determination of the costs of regulation for purposes of determining whether a SERC is required and/or legislative ratification may be required.

- b. The costs of digitizing the mail will not be borne by the Department but will be borne by the vendor and will be part of the contract the Department currently has with the vendor. There will be no additional costs to the Department for the digitization of mail. As stated at the public hearing on this proposed rule, the proposed will streamline department employee's time and make the Department more efficient.
2. Argument Regarding Digitization Costs
- a. The costs of digitization will be borne by the vendor and will be part of the contract the Department currently has with the vendor. There will be no additional costs to the Department for the digitization of mail. Moreover, the costs to the Department are irrelevant in the determination of whether regulatory costs will exceed \$1,000,000 in five years, as "regulatory costs" are costs to regulated entities/individuals, not the Department.
3. Argument Regarding Cost of \$52,500,000
- a. The costs of digitization will be borne by the vendor and will be part of the contract the Department currently has with the vendor. There will be no additional costs to the Department for the digitization of mail. Moreover, the costs to the Department are irrelevant in the determination of whether regulatory costs will exceed \$1,000,000 in five years, as "regulatory costs" are costs to regulated entities/individuals, not the Department.
 - b. This estimation offered by the requestors assumes a lot of details which are factually incorrect:
 - i. The Department will not be using its employees to digitize mail, and as such, this proposed rule will not affect overtime or "manpower hours" in any way.
 - ii. It will not take the Department 15 minutes to digitize a page, as the vendor will bear all costs of digitization.

The proposed "alternative" is not an alternative as it does not even attempt to describe how the problems the proposed rule is attempting to solve will be accomplished by keeping the rule as is. Additionally, the "alternative" assumes facts that are entirely incorrect and/or irrelevant. As such, it is rejected in whole.

See attachment "B". This expands on the email contained in Exhibit "A" and includes additional information.

Adopted in entirety.

Adopted / rejected in part. *(Provide a description of the parts adopted or rejected, and provide a brief statement of the reasons adopting or rejecting this alternative in part).*

Rejected in entirety. *(Provide a brief statement of the reasons rejecting this alternative).*

According to Section 120.541(1)(a), F.S., a lower cost regulatory alternative may include the alternative of not adopting any rule if the proposal explains how the lower costs and objectives of the law will be achieved by not adopting any rule. The email in Exhibit “B” does not attempt to describe how this “alternative” will achieve the objectives of the law being implemented as currently proposed by the Department. It is impossible to do so, as maintaining the current effective version of the rule does nothing comparable to the amendments proposed by the Department to decrease the documented problem of dangerous drugs and weapons being sent through routine mail. The Department’s decision to digitize inmate routine mail is based on the safety of staff and inmates. From January 2019 to April 2021, over 35,000 contraband items were discovered in routine mail. Extremely dangerous substances such as liquid chemicals used to lace synthetic marijuana can be soaked into paper and dried, making detection very difficult. Likewise, often deadly narcotics such as fentanyl present a danger to staff who must handle and inspect the mail and the inmate who ultimately receives it.

Although no viable lower cost regulatory alternative has been provided, the Department has decided to evaluate the alleged “lower cost regulatory alternative” received, and responds as follows:

1. Argument Regarding Printing Costs
 - a. Regulatory costs are costs to regulated individuals and entities, not the Department. As such, all alleged costs to the Department in terms of printing are irrelevant to the Department’s determination of the costs of regulation for purposes of determining whether a SERC is required.
 - b. Printing costs to the Department for inmates who cannot access tablets due to their housing status will be none, as the contract with JPAY makes JPAY (rather than the inmate or the Department) responsible for such printing costs.
2. Argument Regarding Costs to Organization
 - a. This is not a lower cost regulatory alternative, but rather disagreement with how the Department determined that regulatory costs would not exceed \$200,000 in the first year for the purpose of determining whether to prepare a SERC. As described herein, the costs to entities sending mail to inmates will be minimal.

The proposed “alternative” is not an alternative as it does not even attempt to describe how the problems the proposed rule is attempting to solve will be accomplished by keeping the rule as is. Additionally, the “alternative” assumes facts that are entirely incorrect and/or irrelevant. As such, it is rejected in whole.

EXHIBIT

A

Sanchez, Lauren

From: Sonesh Chainani <chainani@gmail.com>
Sent: Tuesday, June 8, 2021 3:26 PM
To: Holman, Jason
Subject: Comments on proposed Rule 33-210.101

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and BOARD MEMBER of a non-profit organization called EXCHANGE FOR CHANGE, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzfcergsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule

change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

SONESH CHAINANI, ESQ.

Cell: 917-747-1755

Sanchez, Lauren

From: Kelly Elizabeth Miller <kelly.elizabeth.miller@gmail.com>
Sent: Tuesday, June 8, 2021 4:16 PM
To: Holman, Jason
Subject: Concern about Proposed Rule 33-21-.101 Routine Mail

Dear FDC Assistant Counsel Holman,

I am writing as a Florida taxpayer and volunteer for Exchange for Change, a non-profit organization substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctifzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC)

associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time!

Sincerely,

Kelly Miller

Kelly E. Miller, Ph.D.
6710 SW 63rd Ave
South Miami, FL 33143

Sanchez, Lauren

From: Grace Waibel <grace@exchange-for-change.org>
Sent: Tuesday, June 8, 2021 4:05 PM
To: Holman, Jason
Subject: CONCERNED ABOUT 33-210.101 Routine Mail PROPOSAL

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and an intern for a non-profit organization, Exchange for Change substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs and provide a proposal for a lower-cost regulatory alternative, namely to reject the proposed rule change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjifzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC)

associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Grace Waibel

Sanchez, Lauren

From: Tom Beeckman <tom@exchange-for-change.org>
Sent: Tuesday, June 8, 2021 4:11 PM
To: Holman, Jason
Subject: E-mail regarding proposed rule 33-210.101 Routine Mail

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and Board Member of the non-profit organization Exchange for Change, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctifzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed,

the required manpower will exceed 5,715 hours ($38,100 * .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 * 79,000 * .15 * 35 = \$207,375$). A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($= 100,000 \text{ persons} * 100 \text{ letter-pages} * \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Tom Beeckman
Board President
Exchange for Change

Sent from my iPhone

Sanchez, Lauren

From: Chaos Burruel <17cburruel@gmail.com>
Sent: Tuesday, June 8, 2021 3:54 PM
To: Holman, Jason
Subject: Email Regarding Routine Mail Rule Change

Dear FDC Assistant Counsel Holman-

I am writing as one substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm

is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.
Thank you in advance for your time.

Chaos Burruel

Sanchez, Lauren

From: Wendy Hinshaw <WHINSHAW@fau.edu>
Sent: Tuesday, June 8, 2021 3:55 PM
To: Holman, Jason; FDCRuleHearing
Subject: Information on proposed rule 33-210.101

Dear FDC Assistant Counsel Holman,

I am writing as a Florida taxpayer and researcher in the field of prison education who is substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctifzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of

the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more (=100,000 persons*100 letter-pages*\$5.25/page).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold (52.5mm/100 = 525k). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Sincerely,
Wendy Hinshaw

--

Dr. Wendy Wolters Hinshaw
Director of Writing Programs
Associate Professor, Department of English
Florida Atlantic University
whinshaw@fau.edu
561.297.3838
she/her/hers

Sanchez, Lauren

From: Robert Hill <rch2130@columbia.edu>
Sent: Tuesday, June 8, 2021 3:23 PM
To: Holman, Jason
Cc: Kathie Klarreich; Tom Beeckman
Subject: Information Regarding Economic Impact of FDC Proposed Rule 33-210.101

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer with expertise in finance and technology, and board treasurer and finance chair of a non-profit organization, Miami-based Exchange For Change Inc., substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

With 17 years of professional experience in finance and technology, and degrees in economics, operations research, business, and systems engineering, including an MBA and PhD, I have extensive experience with the costs of digital transformation initiatives, transitioning from legacy analogue, paper-based systems to digital, automation-based ones, whether in the realm of financial systems or model-based systems engineering. Let me say it plainly: there is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise (\$2.53 cents/incarcerated person, to radically transform how they interact with the outside world). While the long-term economic effects of digital transformation initiatives can in principle be cost-neutral or positive, this is almost never the case in year 1 implementation. I would be happy to provide dozens of concrete examples and academic peer-reviewed articles on cost averages and the tendency for cost-overruns to be on the order of 10x-100x initial estimates.

Please allow me to provide some simple arithmetical calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctifzecergrsvcdqapl2uxxfpy-story.html>). At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours to digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter will cost Florida taxpayers \$5.25 to scan (.15x35/hour), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other

words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more (=100,000 persons*100 letter-pages*\$5.25/page).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold (52.5mm/100 = 525k). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, my purpose in this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While the vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, I cannot imagine they will be providing the manpower to scan the documents, given the potentially enormous costs involved, nor to administer and oversee such a program. Those costs, for which \$54mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time, and I look forward to hearing from you. I am copying the executive director and board chair of Exchange For Change on this email.

regards,

Bob Hill

Coral Gables, FL

Sanchez, Lauren

From: Gina Carreno-Lukasik <gcarreno@fau.edu>
Sent: Tuesday, June 8, 2021 4:08 PM
To: Holman, Jason
Subject: Legislation

Dear FDC Assistant Counsel Holman,

I am writing as a Florida taxpayer, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzfzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph:

https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35*.15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 * .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5*79,000*.15*35=\$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} * 100 \text{ letter-pages} * \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Gina Carreno-Lukasik, PhD

Sent from my iPhone so please forgive typos

Sanchez, Lauren

From: Faith Ward <faithward24@gmail.com>
Sent: Tuesday, June 8, 2021 4:17 PM
To: Holman, Jason
Subject: Let People Have Mail!

Dear FDC Assistant Counsel Holman,

I am writing as a Florida taxpayer substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule

change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Faith Ward

Sanchez, Lauren

From: Josh Young <joshyoung590@gmail.com>
Sent: Tuesday, June 8, 2021 4:17 PM
To: Holman, Jason
Subject: Please don't block incarcerated people's rights to physical mail!!!

Dear FDC Assistant Counsel Holman,

I am writing as a Florida taxpayer and volunteer and supporter of a non-profit organization Exchange for Change, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjfecergsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more (=100,000 persons*100 letter-pages*\$5.25/page).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Josh Young, Miami, FL
c. 305-323-2158

Sanchez, Lauren

From: Pollack, Jacqueline <jpollack1@ufl.edu>
Sent: Tuesday, June 8, 2021 3:36 PM
To: Holman, Jason
Subject: Proposed Rule 33-210.101

Dear FDC Assistant Counsel Holman,

I am writing as a Florida taxpayer and member of the Florida Coalition for Higher Education in Prison, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>).

Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} * 100 \text{ letter-pages} * \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Jackie Pollack, MSc

PhD Student | Department of Epidemiology

College of Public Health & Health Professions

University of Florida

Pronouns (She/Her)



Sanchez, Lauren

From: kadjakg@aol.com
Sent: Tuesday, June 8, 2021 4:07 PM
To: Holman, Jason
Subject: Proposed Rule 33-210.101

Dear FDC Assistant Counsel Holman,

I am writing as a Florida taxpayer, and am substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or

photograph: https://guides.uflib.ufl.edu/digital_support_services/average_tiemes. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \cdot .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \cdot .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \cdot 79,000 \cdot .15 \cdot 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \cdot 100 \text{ letter-pages} \cdot \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Sincerely,
Kadja Klarreich-Giglio

Sanchez, Lauren

From: Oliver Buckton <obuckton@fau.edu>
Sent: Tuesday, June 8, 2021 3:58 PM
To: Holman, Jason
Subject: protect mail in Florida prisons

Dear FDC Assistant Counsel Holman,

I am writing as a Florida taxpayer and faculty member at a Public University in Florida, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will amount to less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of

the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more (=100,000 persons*100 letter-pages*\$5.25/page).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold (52.5mm/100 = 525k). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Oliver Buckton
Professor and Chair
Department of English
Florida Atlantic University
Culture and Society CU 97 Room 306
777 Glades Road
Boca Raton, FL 33431
561-297-3830
obuckton@fau.edu

[*The World is Not Enough: A Biography of Ian Fleming*](#)

[*The Many Facets of Diamonds Are Forever: James Bond on Page and Screen
Espionage in British Fiction and Film Since 1900*](#)

[*Cruising with Robert Louis Stevenson: Travel, Narrative, and the Colonial Body*](#)

Please visit our website at:
www.fau.edu/english

Sanchez, Lauren

From: Daniel Zengotita <dzengotita@gmail.com>
Sent: Tuesday, June 8, 2021 4:14 PM
To: Holman, Jason
Subject: Questions concerning proposed rule 33-210.101 Routine Mail

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and supporter of a non-profit organization Exchange for Change, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctifzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the

Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Daniel Zengotita

Get [BlueMail for Android](#)

Sanchez, Lauren

From: Nicole Morse <nikkimorse@gmail.com>
Sent: Tuesday, June 8, 2021 4:13 PM
To: Holman, Jason
Cc: C19InmateHotline
Subject: Re: rule 33-210.101 Routine Mail

Dear FDC Assistant Counsel Holman,

I am writing as a Florida taxpayer and a member of the Community Hotline for Incarcerated People, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter

pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more (=100,000 persons*100 letter-pages*\$5.25/page).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold (52.5mm/100 = 525k). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Nicole Morse

Sanchez, Lauren

From: Valen-Marie Santos <vmarie1118@gmail.com>
Sent: Tuesday, June 8, 2021 3:58 PM
To: Holman, Jason
Subject: Routine Mail Change

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and supporter of a non-profit organization Exchange for Change, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjfecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer

and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Valen-Marie Santos

Sanchez, Lauren

From: Paula Da Silva <paula@exchange-for-change.org>
Sent: Tuesday, June 8, 2021 3:53 PM
To: Holman, Jason
Subject: Routine Mail SERC Request

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and Program Coordinator of a non-profit organization Exchange For Change, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjfecergsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC)

associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Paula Da Silva

Sanchez, Lauren

From: Kobetz Pelz, Shara G <skobetz@law.miami.edu>
Sent: Tuesday, June 8, 2021 3:32 PM
To: Holman, Jason
Subject: Rule 33-210.101

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and Vice President of Exchange for Change, a non profit substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctifzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule

change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Shara Kobetz Pelz

Sent from my iPhone

Sanchez, Lauren

From: Kathie Klarreich <kathie@exchange-for-change.org>
Sent: Tuesday, June 8, 2021 3:16 PM
To: Holman, Jason
Subject: Rule 33-210.101 Routine Mail

Dear FDC Assistant Counsel Holman-

Dear FDC Assistant Council Holman:

I am writing as a Florida taxpayer and the Executive Director of Exchange for Change, a Miami-based non-profit organization substantially affected by proposed rule 33-210.101 Routine Mail.

I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change.

I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctifzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100-page letters or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg.

In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more (=100,000 persons*100 letter-pages*\$5.25/page).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold (52.5mm/100 = 525k).

I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Kathie Klarreich

--

Kathie Klarreich

Executive Director

<http://www.exchange-for-change.org/>

305 771-3241 work



Sanchez, Lauren

From: Eden Kinlock <edenkinlock@gmail.com>
Sent: Tuesday, June 8, 2021 4:00 PM
To: Holman, Jason
Subject: Rule 33-210.101

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and supporter of a non-profit organization Exchange for Change, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctifzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm

is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time,

Eden Kinlock

Sanchez, Lauren

From: Leira, Nicholas Alexander <nal72@miami.edu>
Sent: Tuesday, June 8, 2021 3:58 PM
To: Holman, Jason

Dear FDC Assistant Counsel Holman-

I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctifzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.
Nick Leira

Sent from my iPhone

From: Chloe Firetto-Toomey <chloefirettotoomey@gmail.com>
Sent: Tuesday, June 8, 2021 4:11 PM
To: Holman, Jason

Dear FDC Assistant Counsel Holman,

I am writing as a Florida taxpayer and facilitator for Exchange for Change, a non-profit organization substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs and provide a proposal for a lower-cost regulatory alternative, namely to reject the proposed rule change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I, therefore, ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological, and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Chloé Firetto-Toomey

[Little Cauliflower published by Dancing Girl Press 2019](#)
chloefirettotoomey.com

"You do not have to be good. You do not have to walk on your knees for a hundred miles through the desert, repenting. You only have to let the soft animal of your body love what it loves. Tell me about despair. Yours. And I will tell you mine." Mary Oliver

Sanchez, Lauren

From: Lyndsay Borchardt <lyndsay.borchardt@gmail.com>
Sent: Tuesday, June 8, 2021 4:03 PM
To: Holman, Jason
Subject: URGENT

Dear FDC Assistant Counsel Holman,

I am writing as a Florida taxpayer, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/.../4-florida-prisons-could.../>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/.../os-prem-ne-florida...>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: <https://guides.uflib.ufl.edu/digital.../average-times>. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to

point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Lyndsay Borchardt

Sanchez, Lauren

From: Delaney Tarr <delaneytarr@gmail.com>
Sent: Tuesday, June 8, 2021 4:24 PM
To: Holman, Jason
Subject: email regarding routine mail rule change

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and supporter of a non-profit organization, Dream Defenders, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctifzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC)

associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Delaney Tarr

Sanchez, Lauren

From: danny marmorstein <marmorsteid@att.net>
Sent: Tuesday, June 8, 2021 4:18 PM
To: Holman, Jason
Subject: Nay to proposed rule 33-210.101 Routine Mail

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and supporter of a non-profit organization, Exchange For Change, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zc1ifzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: [Guides @ UF: Digital Support Services: Workflows and Estimated Times for Digitization](#). This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

Guides @ UF: Digital Support Services: Workflows and Estimated Times for...

DSS develops, manages, and publishes digital content from curatorial collections, in support of academic program...

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more (=100,000 persons*100 letter-pages*\$5.25/page).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold (52.5mm/100 = 525k). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you for your time and consideration.

Daniel Marmorstein

Sanchez, Lauren

From: George S. Franklin, Esq. <Franklin@nelsonfranklin.com>
Sent: Tuesday, June 8, 2021 4:18 PM
To: Holman, Jason
Subject: Objections to proposed rule 33-210.101 Routine Mail

Dear FDC Assistant Counsel Holman:

I am writing as a Florida taxpayer, a member of The Florida Bar, and as a volunteer facilitator for Exchange for Change, a non-profit organization substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC)

associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you for your time and consideration of this email.

George Franklin

George S. Franklin
9328 SW 132nd Street
Miami, Florida 33176
786.302.7465
<https://qsfranklin.com/>

Sanchez, Lauren

From: Paul Feigenbaum <pfeigenb@yahoo.com>
Sent: Tuesday, June 8, 2021 4:34 PM
To: Holman, Jason
Subject: proposed rule 33-210.101 Routine Mail

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and Member of the non-profit organization Exchange for Change, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctifzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: [Guides @ UF: Digital Support Services: Workflows and Estimated Times for Digitization](#). This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Paul Feigenbaum

Sanchez, Lauren

From: Mattice, Sarah <s.mattice@unf.edu>
Sent: Tuesday, June 8, 2021 4:33 PM
To: Holman, Jason
Subject: Proposed Rule 33-210.101 Routine Mail

Dear FDC Assistant Counsel Holman,

I am writing as a Florida taxpayer and as a faculty member at the University of North Florida. We have a small but growing program engaging local inmates with philosophical education, which would be substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

SM

S. Mattice, Ph.D.
Associate Professor
Department of Philosophy and Religious Studies
Director of Interdisciplinary Studies
University of North Florida



[Metaphor and Metaphilosophy](#)

CONFIDENTIALITY NOTICE: This electronic mail transmission and any documents accompanying it may contain confidential information, protected by the Family Educational Rights and Privacy Act. Please protect the privacy of this information and do not forward this email. If you have received this transmission in error, please immediately notify the sender to arrange for the return of the message and any attached documents.

Sanchez, Lauren

From: Sika Dagbovie <sdagbovie@hotmail.com>
Sent: Tuesday, June 8, 2021 4:37 PM
To: Holman, Jason
Subject: RE: Rule 33-210.101 Routine Mail

Dear FDC Assistant Counsel Holman,

I am writing as a Florida taxpayer substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjfzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of

the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more (=100,000 persons*100 letter-pages*\$5.25/page).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold (52.5mm/100 = 525k). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

--Sika Dagbovie-Mullins

Sent from [Outlook](#)

Sanchez, Lauren

From: Andrea M <andrealeamiller@gmail.com>
Sent: Tuesday, June 8, 2021 4:29 PM
To: Holman, Jason
Subject: Re: Rule 33-210.101 Routine Mail

Dear FDC Assistant Counsel Holman,

I write as a Florida taxpayer substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzceergsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of

the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more (=100,000 persons*100 letter-pages*\$5.25/page).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold (52.5mm/100 = 525k). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Sincerely,

Dr. Andrea Miller

Sanchez, Lauren

From: Matador <thegreentrilby@gmail.com>
Sent: Tuesday, June 8, 2021 4:30 PM
To: Holman, Jason
Subject: Reject proposed rule 33-210.101

Dear FDC Assistant Counsel Holman:

I am writing as a Florida taxpayer and supporter of non-profit organization Exchange for Change, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change.

I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations:

The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctifzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes 0.15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times 0.15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times 0.15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($0.5 \times 79,000 \times 0.15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Matthew Matrisciano
Windermere, Florida

Sanchez, Lauren

From: Nico Machado Rusconi <99nicomaru@gmail.com>
Sent: Tuesday, June 8, 2021 4:29 PM
To: Holman, Jason
Subject: Rights to Physical Mail

Dear FDC Assistant Counsel Holman,

I am writing as a Florida taxpayer and supporter of a non-profit organization Exchange For Change, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in

advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Ana Machado Rusconi

~Ana Rusconi

Sanchez, Lauren

From: Jason Sylvestre <jason.sylvestre@gmail.com>
Sent: Tuesday, June 8, 2021 4:32 PM
To: Holman, Jason
Subject: rule 33-210.101 Routine Mail

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and supporter of a non-profit organization Exchange for Change, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC)

associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Jason Sylvestre

Sanchez, Lauren

From: Glenn Hutchinson <glennhutchinson@mac.com>
Sent: Tuesday, June 8, 2021 4:18 PM
To: Holman, Jason
Subject: Rule 33-210.101 Routine Mail Issue/Concern

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and volunteer of a non-profit organization Exchange for Change, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctifzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC)

associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Glenn Hutchinson
North Miami, Florida

Sanchez, Lauren

From: Alycia Merritt <alycia.merritt1@gmail.com>
Sent: Tuesday, June 8, 2021 4:21 PM
To: Holman, Jason
Subject: Rule 33-210.101 Routine Mail

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and member of a non-profit organization March for Our Lives, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqap12uuxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm

is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.
Thank you in advance for your time.

Alycia Merritt

Sanchez, Lauren

From: Susan Gay Wemette <susan@blueplanetglobaled.org>
Sent: Tuesday, June 8, 2021 4:19 PM
To: Holman, Jason
Cc: Paula Da Silva
Subject: SERC Requested re: Proposed Rule 33-210.101

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and instructor at the non-profit organization **Exchange for Change**, which is substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctifzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Dr. Susan Gay Wemette

Susan Gay Wemette, Ph.D.

Pronouns: She, Her, Hers

Co-Executive Director

susan@blueplanetglobaled.org

Blue Planet Global Education

www.blueplanetglobaled.org



We coach teachers on using international classroom-to-classroom collaborations to teach core curriculum and global competence.

Sanchez, Lauren

From: Venessa Grullon <venessa.grullon@gmail.com>
Sent: Tuesday, June 8, 2021 4:29 PM
To: Holman, Jason

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC)

associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your ,

Venessa Grullon,
Certified Wedding Planner
Bflyevents.com
Advocate/Volunteer
407.592.1476

Sanchez, Lauren

From: Michelle Shindell <meesh905@gmail.com>
Sent: Tuesday, June 8, 2021 4:20 PM
To: Holman, Jason

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and as a teacher of Thinking for A Change for LEAP, a non-profit organization **working in the prison system**. We will be substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctifzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling

moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Michelle G Shindell
Ladies Empowerment Action Program

Sanchez, Lauren

From: Schriftman, Joshua N <j.schriftman@miami.edu>
Sent: Tuesday, June 8, 2021 4:26 PM
To: Holman, Jason
Subject: What are you doing?

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and former director and current volunteer and supporter of the non-profit organization Exchange for Change, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctifzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the

Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Joshua Schriftman

University of Miami
Proposal Writer and Senior Lecturer

Sanchez, Lauren

From: Farris Bukhari <farris@farrisbukhari.com>
Sent: Tuesday, June 8, 2021 8:48 PM
To: Holman, Jason
Subject: Email regarding routine mail change

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and board member of a non-profit organization Exchange for Change, substantially affected by proposed rule 33-210.101 Routine Mail.

I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change.

I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjfecergsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change.

While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved.

Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Farris Bukhari

Sanchez, Lauren

From: Miles Arambula <milesarambula@gmail.com>
Sent: Tuesday, June 8, 2021 4:38 PM
To: Holman, Jason
Subject: FDC right to mail

Dear FDC Assistant Counsel Holman-

I am writing as a concerned citizen, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm

is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Miles Arambula

Sanchez, Lauren

From: Li, Collin <collinjli@law.miami.edu>
Sent: Tuesday, June 8, 2021 4:55 PM
To: Holman, Jason
Subject: FDC should prepare a SERC and be held accountable

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and supporter of a non-profit organization Exchange 4 Change, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to

require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Collin J. Li

CollinJLi@law.miami.edu | (917)-508-9265

JD Candidate, Miami Law Class of 2023

Harvey T. Reid Scholar

Miami Public Interest Scholar

Sanchez, Lauren

From: Gregory Bush <publicbush@gmail.com>
Sent: Tuesday, June 8, 2021 5:04 PM
To: Holman, Jason
Cc: Carmen M. Alvarez S.
Subject: FLORIDA PRISONERS AND MAIL??? Really??

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and PRESIDENT OF a non-profit organization Nature Links, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjtzecergsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the

cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more (=100,000 persons*100 letter-pages*\$5.25/page).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold (52.5mm/100 = 525k). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Dr. Gregory Bush
University of Miami History Professor (retired)

Sanchez, Lauren

From: Sanchez, Angel E <aes258@law.miami.edu>
Sent: Tuesday, June 8, 2021 4:56 PM
To: Holman, Jason
Subject: Objection to Cost of Proposed Rule 33-210.101 "Routine Mail"

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and member of multiple non-profit organizations that serve incarcerated individuals and their loved ones who will be substantially affected by proposed rule 33-210.101 Routine Mail.

I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and adopt the proposed alternative of rejecting this rule-change. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a **major state-wide digitization initiative** that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis *in advance of fees generated*, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Angel E. Sanchez, JD

Board of Director: Exchange for Change

Member: Florida Rights Restoration Coalition

Member: Florida Coalition for Higher Education in Prison

Email: aes258@miami.edu

Sanchez, Lauren

From: Tim Watson <watsontp@gmail.com>
Sent: Tuesday, June 8, 2021 4:58 PM
To: Holman, Jason
Subject: opposing proposed rule 33-210.101 Routine Mail in prisons

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and financial supporter of non-profit organization Exchange for Change, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC), and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC)

associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Tim Watson
Coral Gables, FL

Sanchez, Lauren

From: Meena Jagannath <meenaj@gmail.com>
Sent: Tuesday, June 8, 2021 4:48 PM
To: Holman, Jason
Subject: Opposition to Proposed Rule 33-210

Dear FDC Assistant Counsel Holman:

I am writing as a Florida taxpayer, an attorney and board member of a non-profit organization called Exchange for Change, which stands to be substantially affected by proposed rule 33-210.101 Routine Mail. The proposal is one that undermines the ability for incarcerated people to touch, interact with and physically keep the correspondence (beyond that which can be sent with 1 postage stamp) of their loved ones, and would thereby impact their rehabilitation and mental health. It impacts Exchange for Change's ability to achieve its mission because we communicate with our incarcerated students through the mail and the length of our correspondence often exceeds 5 pages. It should be patently rejected as a rule change on these grounds alone, but we can also justify rejection of the rule on the grounds of the fiscal impact of the proposed change. Of course, we have not seen a statement of estimated regulatory costs (SERC) based on the fallacious assumption that this proposal would cost less than \$200,000, which is also deeply problematic and duplicitous.

Other Floridians have doubtless shared more realistic calculations of the cost of this change, which would have to include staff time, benefits, and more. The sum of these comments should tip in favor of rejecting this short-sighted and ill-conceived rule change.

Thank you for your consideration.
Meena

Sanchez, Lauren

From: Veronica <127usa@gmail.com>
Sent: Tuesday, June 8, 2021 4:49 PM
To: Holman, Jason
Subject: Please read through

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling

moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Nika

Sanchez, Lauren

From: Leibell, Barbara Carol <dleibell@miami.edu>
Sent: Tuesday, June 8, 2021 4:46 PM
To: Holman, Jason
Subject: Proposed Change to Digitize Prisoners' Mail

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and member of a non-profit organization Exchange for Change, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to

require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Duba Leibell
Asst. Professor in Practice Screenwriting
School of Communication
Department of Cinematic Arts
University of Miami
305-582-6571
305-284-5226 fax
dleibell@miami.edu

Sanchez, Lauren

From: Brian Fullford <brianfullford@gmail.com>
Sent: Tuesday, June 8, 2021 4:47 PM
To: Holman, Jason
Subject: Proposed rule 33-210.101 Routine Mail

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and member of the non-profit organization Florida Prison Education Project - FCHEP, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctifzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC)

associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Brian Fullford, Phil M.A.
11687 Kings Mountain Way
Jacksonville, FL 32256
904.591.1333

Sanchez, Lauren

From: Carmen Alvarez <CAS@aristar.net>
Sent: Tuesday, June 8, 2021 4:51 PM
To: Holman, Jason
Subject: Proposed Rule 33-210.101

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer in regards to proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjfecergsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling

moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Carmen M. Alvarez

PLEASE think of the Environment before you print

"Never doubt that a small group of thoughtful, committed people can change the world. Indeed, it is the only thing that ever has." Margaret Mead

This e-mail and any files transmitted with it are confidential and are solely for the use of the addressee. It may contain material that is legally privileged, proprietary or subject to copyright belonging to the sender and its affiliates, and it may be subject to protection under federal or state law. If you are not the intended recipient, you are notified that any use of this material is strictly prohibited. If you received this transmission in error, please contact the sender immediately by replying to this e-mail and delete the material from your system. The sender may archive e-mails, which may be accessed by authorized persons and may be produced to other parties, including public authorities, in compliance with applicable laws.

Sanchez, Lauren

From: Stephen Charbonneau <scharbo1@fau.edu>
Sent: Tuesday, June 8, 2021 5:44 PM
To: Holman, Jason
Subject: Proposed rule 33-210.101 Routine Mail

Dear FDC Assistant Counsel Holman,

I am writing as a Florida taxpayer and lifelong educator at Florida Atlantic University and as one who is substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. **I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule.** Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Thank you in advance for your time.

Sincerely,
Stephen Charbonneau

Stephen Charbonneau, PhD
Graduate Director / Associate Professor of Film Studies
School of Communication and Multimedia Studies
Florida Atlantic University
<https://cup.columbia.edu/book/projecting-race/9780231178907>
<https://iupress.org/9780253051394/insurgent-media-from-the-front/>
Gender Pronouns: he/his/him

Sanchez, Lauren

From: maria lovett <got2lovett@gmail.com>
Sent: Tuesday, June 8, 2021 4:49 PM
To: Holman, Jason
Subject: Proposed rule 33-210.101

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and teacher and substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctifzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to

point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Maria K. Lovett

--

Maria Lovett, PhD

Florida International University

Clinical Associate Professor

Educational Policy Studies

School of Education and Human Development

• *Florida Alliance for Math Literacy and Equity (FLAME) faculty liaison | Miami Algebra Project Council*

11200 SW 8th Street, Miami, FL 33199 - ZEB 339B

office | 305.348.0162

mobile | 305.781.3956

Sanchez, Lauren

From: Shanzay Pervaiz <sypervaiz@gmail.com>
Sent: Tuesday, June 8, 2021 4:45 PM
To: Holman, Jason
Subject: Regarding Proposed Rule 33-210.101 - Routine Mail

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and supporter of a non-profit organization Exchange for Change, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter

pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more (=100,000 persons*100 letter-pages*\$5.25/page).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold (52.5mm/100 = 525k). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Shanzay Pervaiz

Sanchez, Lauren

From: Thomas Carlino <tmccat7@gmail.com>
Sent: Tuesday, June 8, 2021 4:46 PM
To: Holman, Jason
Subject: Routine Mail

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and supporter of a non-profit organization Exchange for Change, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm

is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Thomas Carlino

Sanchez, Lauren

From: Victoria Simon <viccysimon@gmail.com>
Sent: Tuesday, June 8, 2021 5:28 PM
To: Holman, Jason
Subject: Rule 33-210.101 Routine Mail

Dear FDC Assistant Counsel Holman:

I am writing as a Florida taxpayer and a voter, and also as a member and supporter of FRRC and Exchange for Change. Based on these affiliations, I am substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

The media has done some of the homework on this. Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjfecergsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Victoria Simon Krawcheck
Taxpayer and voter

Sanchez, Lauren

From: McGrath Moreira, Kimberly A <kmcgrath@miami.edu>
Sent: Tuesday, June 8, 2021 4:55 PM
To: Holman, Jason
Subject: Statement of Rejection for Rule 33-21.101 - Routine Mail

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and faculty member who collaborates with Exchange for Change, a non-profit organization supporting incarcerated students that would be substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is *prima facie* absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Sincerely,
Kimberly McGrath Moreira

Kimberly McGrath Moreira *she/her/hers*
Senior Lecturer, English Composition
Faculty Fellow, Hecht Residential College 2020-2022
University of Miami
Coral Gables, FL
Email: kmcgrath@miami.edu

Sanchez, Lauren

From: Kaylah Brathwaite <kaylahbrathwaite01@gmail.com>
Sent: Tuesday, June 8, 2021 4:54 PM
To: Holman, Jason
Subject: TIME SENSITIVE: Rule 33-210.101 Routine Mail

Dear FDC Assistant Counsel Holman-

I am writing as a community member, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm

is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Kaylah Brathwaite

--

Kaylah Brathwaite (they/her)
Special Projects Operations Associate

[MARCH ON/Future Coalition](#)

kaylah@wearemarchon.org

704.493.7484

Sanchez, Lauren

From: Norma Uriostegui <nburiostegui@gmail.com>
Sent: Tuesday, June 8, 2021 4:50 PM
To: Holman, Jason
Subject: Urgent request

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and supporter of a non-profit organization, Exchange for Change, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC)

associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time,
Norma Uriostegui

Sanchez, Lauren

From: Matt Deitsch <mattswrite@gmail.com>
Sent: Tuesday, June 8, 2021 4:50 PM
To: Holman, Jason
Subject: Urgent Response Needed: Read whole message before replying please

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and anti-violence advocate, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjfecergsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm

is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Peace,

Matt Deitsch

March For Our Lives CoFounder

m: (954)254-2554

e: Mattswrite@gmail.com

t: @MattxRed

Sanchez, Lauren

From: Ryan Deitsch <ryansonusa@gmail.com>
Sent: Tuesday, June 8, 2021 5:00 PM
To: Holman, Jason
Subject: Urgent: Do The Right Thing

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and concerned citizen, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm

is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Ryan Deitsch

Sanchez, Lauren

From: Farris Bukhari <farris@farrisbukhari.com>
Sent: Tuesday, June 8, 2021 8:48 PM
To: Holman, Jason
Subject: Email regarding routine mail change

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and board member of a non-profit organization Exchange for Change, substantially affected by proposed rule 33-210.101 Routine Mail.

I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change.

I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change.

While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved.

Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Farris Bukhari

Sanchez, Lauren

From: Eric Berlatsky <eberlats@fau.edu>
Sent: Tuesday, June 8, 2021 6:15 PM
To: Holman, Jason
Subject: inmates' mail

Dear FDC Assistant Counsel Holman,

I am writing as a Florida taxpayer [and MEMBER/DIRECTOR/BOARD MEMBER: INSERT TITLE HERE of a non-profit organization INSERT TITLE HERE] , substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctifzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter

pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more (=100,000 persons*100 letter-pages*\$5.25/page).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold (52.5mm/100 = 525k). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

--

Eric L. Berlatsky
Professor, Department of English
Associate Dean of Graduate Studies and
Director of the Ph. D. Program in Comparative Studies
Dorothy F. Schmidt College of Arts and Letters
Florida Atlantic University
561-297-0928
eberlats@fau.edu
masculine pronouns
[Mixed-Race Superheroes](#)
[The Real, The True, and The Told: Postmodern Historical Narrative and the Ethics of Representation](#)
[Alan Moore: Conversations](#)

Sanchez, Lauren

From: Christina Bracken <christinabracken@gmail.com>
Sent: Tuesday, June 8, 2021 5:49 PM
To: Holman, Jason
Subject: Mail for Inmates

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and **Supporter** of a non-profit organization **Exchange 4 Change**, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctifzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the

cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more (=100,000 persons*100 letter-pages*\$5.25/page).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold (52.5mm/100 = 525k). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Christina Bracken

Christina Bracken

Citizens don't have term limits.

786.367.6829

GoVoteMiami.org

Register, Then Vote in Every Election

Sanchez, Lauren

From: Erin Marcus <erinnmarcusmd@icloud.com>
Sent: Tuesday, June 8, 2021 6:15 PM
To: Holman, Jason
Cc: gatitaturka@gmail.com
Subject: OPPOSING proposed rule 33-210.101 Routine Mail

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer , substantially affected by proposed rule 33-210.101 Routine Mail.

This is a short-sighted idea that will make public safety worse. Incarceration should be a chance to reform prisoners. If you deprive them of contact with their loved ones they will become more hardened and more likely to commit crimes once they get out.

Not to mention that this dumb idea will COST FL taxpayers money. The only people who will gain are the craven companies that are lobbying for this law because they see it as a way to make a profit, at taxpayers' expense.

To that end, I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \cdot .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \cdot .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \cdot 79,000 \cdot .15 \cdot 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per

year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more (=100,000 persons*100 letter-pages*\$5.25/page).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold (52.5mm/100 = 525k). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Do you want to help make incarceration in FL even more medieval by passing this law? The rest of the world has progressed, but here in the Sunshine State it will be an eye for an eye - all at taxpayers' expense. Don't embarrass the state.

Thank you in advance for your time.

Sincerely,

Mimi Marcus

Sent from my iPhone

Sanchez, Lauren

From: Jeremy Hinshaw <jhinshaw919@gmail.com>
Sent: Tuesday, June 8, 2021 6:35 PM
To: Holman, Jason
Subject: Proposed rule 33-210.101 Routine Mail

Dear FDC Assistant Counsel Holman,

I am writing as a Florida taxpayer, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

For example, the cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/.../4-florida-prisons-could.../>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/.../os-prem-ne-florida...>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: <https://guides.uflib.ufl.edu/digital.../average-times>. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-

one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you so much,

Jeremy Hinshaw

--

Jeremy W Hinshaw, CPA, CGMA
Boca Raton, FL

Sanchez, Lauren

From: Spivey, Donald <dspivey@miami.edu>
Sent: Tuesday, June 8, 2021 6:32 PM
To: Gregory Bush; Holman, Jason
Cc: Carmen M. Alvarez S.
Subject: Re: [EXTERNAL] FLORIDA PRISONERS AND MAIL??? Really??

Well done. I concur, Greg.

Best,

Don

Donald Spivey, PhD
Special Advisor to the President on Racial Justice
Distinguished Professor of History
University of Miami
P.O. Box 248107
Coral Gables, FL 33124
Ph : 305-284-2737
Hist. Main Office: 305-284-3660
Fax: 305-284-3558
dspivey@miami.edu

(Street Address):
1252 Memorial Drive
Ashe Bldg. Rm. 610
Coral Gables, FL 33146

From: Gregory Bush <publicbush@gmail.com>
Sent: Tuesday, June 8, 2021 5:04 PM
To: Jason.Holman@fdc.myflorida.com <Jason.Holman@fdc.myflorida.com>
Cc: Carmen M. Alvarez S. <cas@aristar.net>
Subject: [EXTERNAL] FLORIDA PRISONERS AND MAIL??? Really??

CAUTION: This email originated from outside the organization. DO NOT CLICK ON LINKS or OPEN ATTACHMENTS unless you know and trust the sender.

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and PRESIDENT OF a non-profit organization Nature Links, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the

proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zcijfzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Dr. Gregory Bush
University of Miami History Professor (retired)

Sanchez, Lauren

From: Bianca Clarke <biancalclarke@yahoo.com>
Sent: Tuesday, June 8, 2021 5:49 PM
To: Holman, Jason; Bianca Clarke
Subject: Request for Public Hearing on Notice of Proposed Rule 33-210.101

Dear Mr. Holman,

My name is Bianca Gadson. I am a substantially affected person under Florida Administrative Code Section 120.536(3) as I regularly write to incarcerated people.

Please accept this as my request in writing within 21 days of the Notice of Rule Development on 33-210.101 published on 5/18/2021 that a public hearing be held with regard to this change. Further, I request that FDC ensure the persons responsible for preparing the proposed rule are available to explain the agency's proposal and to respond to questions or comments regarding the rule.

Please allot 2 minutes for me to speak. As Florida is still experiencing the effects of the COVID-19 pandemic, please hold this hearing by video conferance and provide at least 14 days' notice pursuant to 120.54(3)(a)3. For this reason only, you may use my email address as my mailing address.

Respectfully,
Bianca Gadson

Sanchez, Lauren

From: Wynne, Daniel R. <DWynne@dadeschools.net>
Sent: Tuesday, June 8, 2021 7:42 PM
To: Holman, Jason
Subject: Rule 33-210.101 Routine Mail

Dear FDC Assistant Counsel Holman,

I am writing as a Florida taxpayer and member of a non-profit organization, Exchange for Change, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required

manpower will exceed 5,715 hours ($38,100 * .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 * 79,000 * .15 * 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($= 100,000 \text{ persons} * 100 \text{ letter-pages} * \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time

Dan Wynne
MDCPS Division of Educational Opportunity and Access

Sanchez, Lauren

From: Russell Banks <rebstudio@icloud.com>
Sent: Tuesday, June 8, 2021 9:32 PM
To: Holman, Jason
Subject: EXCHANGE FOR CHANGE

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and A MEMBER OF THE ADVISORY BOARD of a non-profit organization **EXCHANGE FOR CHANGE**, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC)

associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

RUSSELL BANKS

Sanchez, Lauren

From: Cristina de Cordoba <cristina@primascreative.com>
Sent: Tuesday, June 8, 2021 9:09 PM
To: Holman, Jason
Subject: proposed rule 33-210.101 Routine Mail

Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer and member of a non-profit organization Exchange for Change, substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

There is nothing routine about proposed rule 33-210.101 Routine Mail. It proposes a major state-wide digitization initiative that would significantly transform how incarcerated persons in Florida interact with the outside world. There is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise.

Here are some simple calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjzecerqsvcdqapl2uxxfpy-story.html>). Further, the number of pages to be allowed per letter will effectively be limited to 5, the number of pages that can be mailed with a single stamp, as stipulated in section 4a) of the proposed rule, also implicitly acknowledging the increased costs required. At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours (9 minutes) to process and digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter page will cost Florida taxpayers \$5.25 to scan ($=35 \times .15$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($=100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to

require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, the purpose of this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While a vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, they will not be providing the manpower to scan the documents, and administer and oversee such a program, given the potentially enormous costs involved. Those costs, for which \$52.5mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time.

Cristina de Cordoba

EXHIBIT

B

Sanchez, Lauren

From: Robert Hill <rch2130@columbia.edu>
Sent: Tuesday, June 8, 2021 4:37 PM
To: Holman, Jason
Cc: Kathie Klarreich; Tom Beeckman
Subject: Re: Information Regarding Economic Impact of FDC Proposed Rule 33-210.101

Dear Mr. Holman-

Following up on my prior email, I wish to briefly offer one more economic fact that suggests that FDC should produce a detailed SERC for FDC Proposed Rule 33-210.101, based on there being an expected economic impact to the Florida taxpayer of greater than \$200,000 in year one. There are, on an average day, over 11,400 people housed in Administrative Confinement, Disciplinary Confinement, Close Management I and II, and Maximum Management in Florida state institutions (source: https://www.splcenter.org/sites/default/files/com_solitary_confinement_0.pdf). The proposed rule states in section 7 that such persons "will have their scanned mail printed and delivered at no cost to the inmate." Based on the JPAY contracted rate of 25 cents per page (<https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjfecergsvcdqapl2uxxfpy-story.html>), this means that if each of the over 11,400 persons held in some form of "solitary confinement" receives on average 100 pages annually, the state will incur charges of \$285,000 (=11,400 people*100 pages*.25 dollars/page), merely in printing costs.

Further, if 15 minutes per week per person held in solitary confinement is required to perform this work- of printing off and delivering electronically scanned mail- that means, given the estimate of \$35/hour used in my previous email, that the manpower cost to the state of this proposed rule change, merely in regards to section 7, will be \$4,788,000 (=1 hour/month x 12 months x \$35/hour x 11,400 people). Thus, merely to implement section 7 of the proposed rule change will cost more than five million dollars a year (=4.788mm + .285mm). Even if my estimates of the relevant costs are ten times too high, this still significantly exceeds the SERC threshold of \$200,000 (5.073mm/10 = 507k).

As an organization that publishes a literary journal largely consisting of contributions from incarcerated writers, we at Exchange For Change are economically dependent on routine mail correspondence with persons held in Florida institutions, and are thus directly and substantially financially impacted by the proposed rule change. We thus believe that the proposed rule will have an adverse impact on our enterprise and that the proposed rule is likely to directly or indirectly increase regulatory costs in excess of \$200,000 in the aggregate within 1 year after the implementation of the rule. We thus respectfully request that FDC prepare a statement of estimated regulatory costs as required by s. 120.54(3)(b). Please let me know if I can provide any further information.

regards,
Bob Hill
Exchange For Change

On Tue, Jun 8, 2021 at 3:23 PM Robert Hill <rch2130@columbia.edu> wrote:
Dear FDC Assistant Counsel Holman-

I am writing as a Florida taxpayer with expertise in finance and technology, and board treasurer and finance chair of a non-profit organization, Miami-based Exchange For Change Inc., substantially affected by proposed rule 33-210.101 Routine Mail. I am writing to provide information regarding FDC's lack of a statement of estimated regulatory costs, and provide a proposal for a lower cost regulatory alternative, namely to reject the proposed rule-change. I respectfully request that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) and either adopt the proposed alternative of rejecting this rule-change, or provide a statement of the reasons for rejecting

the alternative in favor of the proposed rule. Given that the proposed rule was published on May 18, 2021, the deadline for such requests is today, June 8.

With 17 years of professional experience in finance and technology, and degrees in economics, operations research, business, and systems engineering, including an MBA and PhD, I have extensive experience with the costs of digital transformation initiatives, transitioning from legacy analogue, paper-based systems to digital, automation-based ones, whether in the realm of financial systems or model-based systems engineering. Let me say it plainly: there is no conceivable way that the year one manpower and administration costs of a digital transformation initiative affecting a system of at least 79,000 persons will be less than \$200,000, and it is prima facie absurd to claim otherwise (\$2.53 cents/incarcerated person, to radically transform how they interact with the outside world). While the long-term economic effects of digital transformation initiatives can in principle be cost-neutral or positive, this is almost never the case in year 1 implementation. I would be happy to provide dozens of concrete examples and academic peer-reviewed articles on cost averages and the tendency for cost-overruns to be on the order of 10x-100x initial estimates.

Please allow me to provide some simple arithmetical calculations. The cost of overtime for FDC employees is on average almost \$36/hour (based on this article: <https://www.tampabay.com/news/florida-politics/2021/03/31/4-florida-prisons-could-close-as-lawmakers-consider-140-million-in-cuts/>). The proposed rule-change itself implicitly acknowledges that more manpower will be needed to digitize and disseminate electronic copies of mail received, as it increases the amount of time allowed by 50%, from 48 to 72 hours (based on this article: <https://www.orlandosentinel.com/news/crime/os-prem-ne-florida-prison-mail-change-scanned-20210528-zctjfecergsvcdqapl2uuxfpy-story.html>). At \$35/hour marginal cost of FDC employee time, that means that if 5,715 or more additional manpower hours are required in year 1 implementation, the economic cost will be above \$200,000 ($5715 \times 35 = 200,025$).

The University of Florida library system estimates that it takes .15 hours to digitize an individual single page or photograph: https://guides.uflib.ufl.edu/digital_support_services/average_times. This means that each letter will cost Florida taxpayers \$5.25 to scan ($.15 \times 35/\text{hour}$), above and beyond current costs of letter/package surveillance and compliance monitoring. This suggests that, conservatively, if 38,100 discrete one-page letters or more are processed, the required manpower will exceed 5,715 hours ($38,100 \times .15 = 5,715$). That means that even if only half the persons incarcerated in the Florida state system received a one-page letter per year, the expected costs will exceed \$200,000 ($.5 \times 79,000 \times .15 \times 35 = \$207,375$).

A more realistic price tag for this proposal would assume that the population of persons held in Florida state institutions will revert to its long-term mean of 100,000 or more; that incarcerated persons receive 100 letter pages or more per year, and that the per document manpower required to scan each letter is only the tip of the cost iceberg. In other words, a reasonable estimate of the cost of this proposed rule change is on the order of not \$200,000 or less, but \$52,500,000 or more ($= 100,000 \text{ persons} \times 100 \text{ letter-pages} \times \$5.25/\text{page}$).

Even if that estimate is 100x too high, it still puts the costs of implementing this rule well above the 200k per annum SERC threshold ($52.5\text{mm}/100 = 525\text{k}$). I therefore ask you to use the information provided here to require that the Florida Department of Corrections prepare a statement of estimated regulatory costs (SERC) associated with the rule change or, preferably, not proceed with the rule change. While there are compelling moral, psychological and social reasons for rejecting the rule change, my purpose in this request is simply to point out the economic absurdity of the claim that it will cost the Florida taxpayer \$200,000 or less in year-one implementation. While the vendor may be providing technology (tablets and kiosks) on a zero-cost basis in advance of fees generated, I cannot imagine they will be providing the manpower to scan the documents, given the potentially enormous costs involved, nor to administer and oversee such a program. Those costs, for which \$54mm is a reasonable lower-bounds estimate for full implementation, would be borne by Florida taxpayers, and thus should be subject to legislative oversight.

Thank you in advance for your time, and I look forward to hearing from you. I am copying the executive director and board chair of Exchange For Change on this email.

regards,

Bob Hill

Coral Gables, FL