
RATIONAL CHOICE AND INMATE DISPUTES OVER PHONE USE ON RIKERS ISLAND

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Abstract: *In an attempt to reduce the high costs of illicit inmate telephone use, a high-security, computerized phone system/or Inmates was introduced on Rikers Island in 1993. A few months after implementation, correction officers observed that the system had the beneficial side effect of reducing fights over phone use. This paper confirms the anecdotal evidence, finding that the new phone system reduced both phone costs and inmate violence related to phone use by 50%. There was little evidence of displacement to other forms of violence. These results demonstrate that violent crime may often be precipitated by situational factors and may be prevented by reducing opportunities for disputes.*

INTRODUCTION

Much criminological theory would hold that offenders commit violent acts on the spur of the moment—to express frustration, anger, or fear—and that situational crime prevention strategies, which manipulate the costs and benefits of committing crimes, would therefore be ineffective (Trasler, 1986). Proponents of situational crime prevention accept that violent crime may be largely expressive or impulsive. Still, they assert, violent acts typically arise out of disputes over material goods or status. If these disputes could be prevented, potentially violent individuals would

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have fewer opportunities to engage in violence (Reiss and Roth, 1993; Clarke, 1992).

This paper applies these competing theories of violent crime to a study of inmate disputes over telephone use within the New York City jail system. Although traditional criminological theory may be right—jail inmates in particular are impulsive and habitually violent—reducing opportunities for disputes can nevertheless help to prevent violent acts from occurring.

Theories of Choice and Culture

Violent acts can be viewed as instrumental because they are committed to obtain non-material rewards that may nonetheless hold value to the offender. This view is embodied in both rational choice and social interactionist explanations of violent behavior. The rational choice perspective asserts that the offender weighs both the monetary and social costs and benefits of crime (Cornish and Clarke, 1986). The social interactionist approach contends that dispute-related violence is caused by a transaction between offender and victim, usually in the presence of a third party, in which the offender is protecting his or her well-being or honor (Felson and Steadman, 1983).

Both the rational choice perspective and the social interactionist approach are supported by empirical evidence. Preventive efforts to alter the environment or the situation surrounding criminal opportunity have successfully reduced pub fights (Hope, 1985; Ramsay, 1986), convenience store robberies (Crow and Bull, 1975; Clifton and Callahan, 1987), post office robberies (Ekblom, 1988), bank robberies (Clarke et al., 1991) and even aircraft hijackings (Wilkinson, 1986). A social interactionist study of sibling violence concluded that such violence can be reduced when clear rules exist regarding the use of materials or the division of labor (Felson, 1983).

These studies go a long way toward explaining how transactions occur, but they fail to explain why they occur. Countless transactions arise each day that could lead to violent disputes, but most are resolved peacefully. Some criminologists argue that the explanation lies in cultural factors. Grounded in Sutherland's differential association theory (Sutherland, 1939), the cultural model contends that violent disputes are more likely to happen when the offender holds values favorable to violence; these values are derived from a culture that promotes "disputatiousness" (Luckenbill and Doyle, 1989).

The correctional environment is a likely setting for the development of a culture that holds values favorable to violence. Toch (1992) analyzed the violent culture of prison in terms of the different self-preserving strategies employed by inmates. According to Toch, violent inmates fall into two categories: those who resort to violence to resolve disputes in order to enhance their egos in their eyes as well as in the eyes of others (status seekers); and those who use violence to obtain pleasure or material goods (dehumanizers).

Status-seeking violent inmates include the "rep-defender," who engages in violence in order to preserve his reputation as a social obligation; the "self-image defender," who uses violence as a form of retribution when someone casts aspersions on his self-image; and the "self-image promoter," who uses violence as a demonstration of worth and to convey to others his toughness and status. Examples of violent inmates who use violence to dehumanize or exploit others include the "bully," who uses violence to obtain pleasure by terrorizing vulnerable individuals; and the "exploiter," who uses violence to coerce individuals into obtaining tools for his pleasure and convenience (Toch, 1992).

Any number of these violent types can become violent over seemingly trivial events. Toch (1992) relates the story of the inmate who has occupied another's seat in the dayroom. When asked to move, the inmate fights out of self-image promoting. The self-image defender is equally inclined to resort to violence in such a scenario. Because he is extremely sensitive to the implications of other people's actions to his integrity, Toch argues, "This man makes a great deal out of not much in the way of unusual incidents" (Toch, 1992:142). The rep-defender, on the other hand, commits violence because his social position or group status obligates him to do so.

Rational choice, social interactionist and cultural explanations of violence all imply "rational" decision making on the part of the offender. Although the decision-making processes of these violent actors may be severely limited by the amount of time they have, their mental capabilities, and the information available to them, this is consistent with the rational choice perspective (Cornish and Clarke, 1987).

Offenders resort to violence to protect their reputations; this is supported by the fact that they are more likely to be involved in a dispute when a third party is present (Luckenbill and Doyle, 1989). Toch identified the motivations behind several different types of violent inmates; each of these involves the pursuit of either status or the acquisition of material

goods or conveniences. And Felson and Steadman (1983) noted that "The picture that emerges from these events is not one of blind irrational behavior. Rather, each participant's actions were a function of the other person's behavior and the implication of that behavior for defending one's well-being as well as one's honor" (1983:72).

Implications for Displacement

The rational choice perspective suggests that inmate violence can be prevented through the use of situational measures. Critics, however, argue that because violent crime is deeply motivated, situational prevention will merely displace violence to other targets. While recent studies have found that displacement following successful crime prevention efforts does not always occur—and is often quite limited when it does occur—it is useful to investigate why specific forms of inmate violence, when prevented, might be displaced to other violent acts.

Traditional criminological theorists would contend that offenders are motivated (or driven) to commit crimes and will do so no matter how insurmountable the hurdles may be. This explanation is inadequate, however, in that it does not support the fact that many opportunity-reducing crime prevention measures have succeeded in reducing crime without displacement, and that even when there is displacement it is not 100% (Clarke and Weisburd, 1994; Eck, 1993; Gabor, 1990; Hesseling, in press).

Cornish and Clarke (1987) suggest that offenders are more likely to substitute one offense for another when alternative offenses share the same "choice-structuring properties" as the crime from which the offender was originally deflected. Choice-structuring properties are those characteristics that the offender considers salient to his or her goals and abilities. Eck (1993) calls this "familiarity," arguing that the offender will persist when alternative means, places, or targets are familiar to him and that he will be less likely to persist when they are not. In addition, Clarke (1978) has argued that the extent to which displacement should be anticipated depends on the intentionality or purposiveness of the behavior. In other words, offenders who seek opportunities will be more likely to persist than those who happen upon them.

Toch's (1992) classification of types of violent inmates enables us to determine why some jail inmates might resort to other crimes when their opportunities are blocked, whereas other inmates will not. Toch's self-

image promoter, bully and exploiter all have personality types that would lead them to promote violent situations despite the removal of a single cause of disagreement. If the bully cannot coerce another offender off the phone, he will instead bully his way to the front of the line for meals. The exploiter, too, will continue to use violence as a means of obtaining things he wants. And the self-image promoter will look for any excuse to promote the fact that he is powerful. Thus, these three offender types have strong motivations to remain violent and actively seek out opportunities to engage in disputes. The rep defender and the self-image defender, on the other hand, are by nature reactive. Toch found that offenders fitting the personality types that are most likely to displace—the self-image promoter, bully, and exploiter—accounted for 43.5% of inmates sampled.

Given the factors associated with displacement, we can predict that situational measures may reduce inmate violence, but that as much as half of it may be displaced, depending upon the choice structuring properties of alternative targets of violence and on the percentage of "proactive" offenders in the inmate population.

The above explanations of violence and displacement suggest that, while actors may be predisposed toward violence, many of them do not actively seek it out but must be offended by a victim. Long-term prevention efforts might focus on teaching offenders coping skills to help them handle such situations in a nonviolent manner—altering the social costs and benefits of dispute-related violence. In the short run, however, a more effective means of preventing dispute-related violence might be to identify and remove or modify the source of the violent altercation. That is, policymakers can alter one or more of the three components that an actor considers when deciding to engage in violence: they can increase the effort, increase the risks or reduce the rewards (Clarke, 1992). Department of Correction administrators did just this when they introduced a new inmate telephone system for jail inmates in 1992. The following section details the background of inmate phone use.

THE TELEPHONE SYSTEM AT RIKERS ISLAND

The New York City Department of Correction runs the largest jail system in the world, with a population of about 18,500. Approximately 75% of jail inmates are detainees, and the remaining 25% are misdemeanants or "E-felons" sentenced to one year or less. These 18,500 inmates are housed in 16 jails; 10 of these Jails are located in the Bronx on Rikers

Island, which is situated on the Hudson River, a stone's throw away from La Guardia Airport.

Each of the 10 facilities on Rikers Island serves a different population of offenders, and each is operated fully independently of the other nine. Several jails house adult male detainees and adult male sentenced inmates. There is also a jail for women inmates, one for adolescent inmates, one for offenders with communicable diseases, and even housing designated for gay inmates. These jails have different levels of security, and may include administrative segregation, punitive segregation, and "enemies" segregation. There are at least 30 categorizations in all. Approximately 110,000 defendants or offenders pass through the New York City jail system annually, at a cost of about \$750 million per year.

The Old Phone System

Prior to the implementation of the new phone system, the inmate phones had open lines with access to local area codes, but the phones were programmed to reject long-distance calls. These blocks did not work well, and inmates came up with countless schemes to access open lines through 800 numbers, and then use stolen credit card numbers to make long distance calls and purchases. The female inmates did just this, accessing the Victoria's Secret catalogue, which resulted in a jail that could boast the best-dressed inmates in the country—until officials caught on. Inmates also used the phones to access their beepers, enabling them to keep up their drug businesses with the outside world. Gaining access to "sex lines" was another common pastime. The New York City Department of Correction's phone bill for jail inmates in 1092 was approximately \$3.2 million; officials believed the vast majority of this cost was due to illegitimate inmate calls.

By law, phone privileges vary according to the inmate's legal status, depending on whether he or she is a detainee, is already sentenced, or is in punitive segregation. Under the old system, corrections officers were supposed to use a log book to record phone use and place limits on the amount of time each inmate had on the phone, keeping track of the inmate's status and privileges. In practice, this was not happening. Occasionally new, naive or overzealous officers would attempt to time calls, but it would not take long for them to realize that there were more important jobs for them to do; limiting inmate phone use was a losing battle and the result was virtually no supervision.

Instead, inmates developed their own system, which is informally referred to as "slot time." The more powerful inmates on the block would determine who had how much time on the phone (slot time). If an inmate wanted slot time, this would have to be paid for through providing favors or commissary to whomever was in power. According to associate commissioner Richard Shapiro, "Battles over slot time resulted in tremendous inmate violence; there were even a few homicides that resulted over phone use" (Shapiro, 1993).

The New Phone System

Department of Correction administrators, seeking to save money, implemented a new phone system to eliminate illicit access to long-distance, 800 and 900 numbers. The new system places strict limits on phone use. Detainees are allowed one regular pre-paid or collect call for a maximum of 15 minutes per day, and one free six-minute local call per day (purportedly to give the detainee the opportunity to contact his attorney). One additional six-minute call per day which, if a detained inmate is indigent and therefore unable to make a regular call, is also allowed; the cost of the call is subtracted from the inmate's commissary account whenever the balance exceeds zero. Total phone time cannot exceed 21 minutes per five-hour period, which was determined by simply dividing the number of inmates by the number of phones, assuring equal "slot time." Sentenced inmates have the same privileges as detained inmates, except that they are limited to only two free calls per week and are not given the additional six-minute call per day. Punitive segregation inmates are not allowed to make collect calls, but are allowed one six-minute local call per day, and one free six-minute call per week.

The new phone system is operated via computer, which is connected to inmate records that indicate the inmate's legal status, as well as the balance of the inmate's commissary account. The computer's timing is very precise: at the end of six minutes, the call is automatically disconnected. The computer can also keep track of the number and length of an inmate's calls, preventing a detained inmate, for example, from exceeding 21 minutes per five-hour period. Deposits to the inmate's commissary account are made by the inmate's friends, family or attorney. The inmate can also volunteer for work, and the pay (\$.25 per hour) is deposited into the commissary account. On any given day, about half of the inmates have positive balances in their commissary accounts (Shapiro, 1993).

Inmates gain access to phone use through bar codes printed on the back of their identification cards, but they must also punch in a four-digit Personal Identification Number (PIN). The bar code is scanned with a laser similar to those used at supermarket checkout counters, and allows the computer to automatically read the inmate's status, privileges, commissary balance, and prior phone use. Commissary accounts are debited at the end of each call. The new phone system also allows corrections officers to turn off phones during inmate counts and for security reasons. Turning off the system does not immediately disconnect the call, it simply prevents additional calls after the current call has ended. In addition, administrators have blocked both the business and home phone numbers of uniformed and civil employees of the Department of Correction, as well as intra- and inter-facility calls, so that inmates cannot hassle the staff or call inmates in other housing units or jails.

The phone system guards against fraud and abuse through flexible software that can react to bugs in the system. To date, there have been numerous attempts to beat the system, but no known successes. For instance, inmates commonly attempt what is called "hook flashing," which means to tap the phone hook to access a second outside line; they hope this maneuver will provide them with either a line open to long-distance calls or an additional free call. But because these phones do not operate like regular phones, hook flashing does not work.

When the new system was first installed, inmates went on hunger strikes and sit-down strikes in protest. Inmates took their case to court and lost, and many inmates vented their anger on the phones themselves. This tactic backfired; when inmates tore out phones, administrators would strategically delay reinstalling them. The absence of working phones made those who destroyed them the enemies of their fellow inmates; two inmates who damaged phones had to be re-housed rather than return to face the wrath—and certain violence—of angry inmates (Shapiro, 1993).

The new phone system was introduced primarily as a cost-saving measure. In the long run, however, it is actually expected to make money because NYNEX, the phone company that handles the long-distance calls, pays the Department of Correction 30% of the profits from such calls. The unintended side effect of the new system has been a purported reduction of inmate-on-inmate violence. The *New York Times* reported this effect, which was supported by quotes from inmates, wardens, and even former Correction Commissioner Catherine Abate, all of whom maintained that inmate violence was down following implementation of the new phone

system (Cllnes. 1903). The following sections outline the research undertaken to determine whether the new phone system has indeed had a significant impact on violent crime among inmates.

METHODOLOGY

The first jail to install the new phone system was the George R. Vierno Center (GRVC). GRVC is a 782-bed facility housing high-risk detainees. It consists of 20 housing units with a total of 60 phones. Correction officials began implementing the phone system in each housing unit in GRVC in September of 1092; by the end of February 1093 the entire jail was operating under the new system.

Because of the initial installation problems at GRVC, records of violence were examined for the periods January through August of 1992 (before implementation), and March through October 1993 (after implementation). Jail administrators made small policy changes in the first few months of implementation, such as altering the location of bar codes from wrist bands to identification cards, and changing the menu options on the phone system. In addition, the system was "down" for a few hours once or twice when phones were destroyed or other problems occurred. Administrators are confident, however, that the system was running smoothly as of March 1993.

Incidents of inmate violence were obtained by reviewing the following three sources: (1) records of "unusual incidents," which are those resulting in serious injury or involving unusual contraband; (2) records of use of force, which document officers' use of force and include allegations on the part of inmates that undue force was used; and (3) records of infractions. All entries are recorded manually and filed by date of occurrence, and because infractions are always followed by brief hearings, written descriptions of these hearings usually indicate the cause of the fight. For example, an infraction record for a fight over phone use under the old system had the following quotation attributed to the defendant: "I was transferred into housing area 3A. I told some of the inmates that I needed to use the phone that night. One of the inmates said 'you just came in here and it's his turn on the phone.' Several inmates jumped me."

Although all records showed where inmate fights took place, some did not indicate the cause of the fight. Fights that have nothing to do with phone use itself may take place at or near the inmate phones. For purposes of this research, inmate fights were considered to be over phone use only

when this was indicated in writing by the reporting official, or when inmates were quoted in summaries of infractions hearings as saying that the fight was over phone use. The extent to which other inmate fights stemmed from phone use is therefore unknown.

The accuracy of the collected data is also limited by the fact that not all inmate fights are known to correction officers, and not all fights known to correction officers are recorded. Because there is no reason to expect differences in reporting over time, however, it is likely that any comparisons will contain the same biases and therefore will not adversely affect a simple before and after comparison.

Fluctuations in inmate population during the period of study may also confound the research findings. The mean population in GRVC over the 16 months studied was 736, with a high of 708, a low of 729 and a standard deviation of 47.1 (Department of Correction, 1993). With the addition of a new wing, the population in GRVC increased significantly after the new phone system was implemented, with the population jumping from 748 in August to 798 in both September and October. Thus, violence rates, rather than the number of violent incidents, are analyzed in Table 2.

Finally, seasonal fluctuations may also be a threat to the research findings. However, a comparison of the overlapping like months both before and after the implementation of the new phone system (from March through August 1992 and 1993) indicates no clear seasonal pattern of violence.

FINDINGS

Table 1 shows the breakdown of violent incidents before and after implementation of the new phone system by either the cause of fight (when known), or the location of the fight. As mentioned earlier, fights over phone use were documented only when the records stated so. For purposes of categorization, the other fights are grouped together by either cause or location. From a strictly subjective observation, it appears that location was often predictive of the cause of fight: fights occurring in the yard, for instance, were invariably over a basketball game, while fights in the dayroom were usually over a card or chess game, seating within the dayroom, TV use, or phone use.

Table 1: Inmate Fights by Cause /Location

Type of Incident	1992 (Old Phone System) January - August		1993 (New Phone System) March - October	
	Number	% of Total	Number	% of Total
Phone Use	39	25.3	22	14.0
Name Calling	5	3.2	4	2.5
Race/Gang-related	6	3.9	8	5.1
From Street/Ongoing Feud	8	5.2	9	5.7
Yard/Basketball	9	5.8	15	9.5
Mess Hall/Food	9	5.8	13	8.3
Dayroom/Games, TV Use	15	9.7	10	6.4
Robberies/Thefts	9	5.8	14	8.9
Unknown/Other	54	35.1	62	39.5
Total	154	100.0*	157	100.0*

*Percentages do not add up to 100 due to rounding error.

As illustrated in Table 1, during the period before implementation, fights over phone use accounted for 25% of all inmate violence and the majority of the inmate violence for which the cause or location is known. In 1993, after implementation of the new phone system, the number of fights over phones dropped from 30 to 22, and accounted for 14% of all inmate violence.

Table 2 shows population-adjusted inmate violence over phone use. If the new phone system reduced inmate violence over phone use, we would expect to see a significant reduction in the number of inmate fights over such use. Table 2 illustrates this reduction, with a statistically significant 47% reduction in inmate fights over phone use ($t_{14} = -2.2$, $p < .05$ with a two-tailed test). There is no evidence of non-normality. Also adjusting for population, Table 2 demonstrates that a 2% increase in non-phone inmate violence occurred, but this was not statistically significant ($t_{14} = 0.14$, $p > .50$). Overall, the total inmate violence was reduced by 10%, but this, too, was not statistically significant ($t_{14} = -.605$, $p > .50$).

More data need to be collected, and only time will tell whether the effects of the new phone system will reduce inmate violence permanently. However, it appears that the new system has prevented inmate violence over phone use, and that displacement to other kinds of inmate violence is not evident.

Table 2: Population-Adjusted Rates of Phone-Related Inmate Violence and All Other Inmate Violence Per 1,000 Inmates

Month	1992 (Old Phone System)			1993 (New Phone System)		
	Phone Violence	All Other Violence	Total Violence	Phone Violence	All Other Violence	Total Violence
JAN	2.8	16.9	19.7			
FEB	4.1	11.0	15.1			
MAR	6.8	13.7	20.5	1.7	13.6	15.3
APRIL	8.2	20.6	28.8	5.3	1.1	26.4
MAY	11.0	23.3	34.3	5.2	24.8	30.0
JUNE	4.1	12.4	16.5	3.9	20.9	24.8
JULY	9.6	27.5	37.1	0	13.7	13.7
AUG	6.9	33.0	39.9	0	32.1	32.1
SEPT				5.0	25.1	30.1
OCT				7.5	11.3	18.8
TOTAL	53.5	158.4	211.9	28.6	162.6	191.2
Average	6.7	19.8	26.5	3.6	20.3	23.9
Standard Deviation	2.9	7.8	9.8	2.7	7.1	7.1

Shaded areas indicate that data were not collected for these time periods.

Phone violence: $t_{14} = -2.2$, $p > .05$ *

Other violence: $t_{14} = 0.14$, $p > .50$ *

Total violence: $t_{14} = -.605$, $p > .50$ *

*Two-tailed test.

While not specifically germane to the issue of inmate violence, it is nonetheless noteworthy to examine the cost savings of the new phone system. Table 3 illustrates the monthly inmate phone costs at GRVC before and after implementation of the new phone system. This table does not include the operating costs of the new phone system, nor does it include the expected profits of inmate collect calls. Nonetheless, the table illustrates that the costs of phone use by inmates have been virtually cut in half, indicating that the new phone system has achieved its intended purpose.

**Table 3: New York City Department of Correction
Monthly Inmate Telephone Costs for the
George R. Vlerno Center**

1992 (Old Phone System)		1993 (New Phone System)	
Month	Cost(\$)	Month	Cost(\$)
January	20.033	March	10.014
February	19.187	April	8.941
March	20.299	May	7.121
April	20.503	June	8.878
May	18.226	July	19.765 •
June	22.102	August	8.767
July	16.354	September	8.840
August	20.651	October	7.855
Total	157.355	Total	80.181

•This figure is greater than expected due to correction of a previous billing error (Sutera, 1994).

Source: New York City Department of Correction (1993).

DISCUSSION

Returning to the three objectives of situational crime prevention outlined by Clarke (1992), it appears that installing the new phone system had an impact on each of the three avenues of preventing crime: increasing the effort, increasing the risk, and reducing the rewards.

The new phone system increased the effort by making it virtually impossible to access outside lines. True, inmates will attempt to coerce other inmates into handing over their ID cards and revealing their PIN numbers, but such extortion is not as easy as simply intimidating someone to hang up a phone.

By requiring inmates to use their ID cards and PIN numbers, the phone system has effectively increased the risks of getting caught. The old phone system allowed inmates to control the phone use; if another inmate complained to a correction officer that he was getting cheated out of phone time, there was no physical proof to back up the story. Now an inmate would not only have to make the effort to steal the ID card and bully the victim, he could also be caught possessing or using the card. Indeed, discussions with correction officers indicate that offenders have been

caught in such attempts. In addition, inmates are aware that the phone system is computerized, and probably also have the perception that the computerized system documents the calls and can trace illicit use back to the offender, further increasing the perceived risks.

Whereas previously illicit phone use had the rewards of accessing 000 numbers, unlimited free long-distance calls, and beeper numbers, the rewards under the new phone system are, at best, an additional 21 minutes of calls each day—and this assumes that the inmate whose card was stolen has a positive balance in his commissary account to pay for these calls. In other words, the rewards are not only limited, they are uncertain.

The data analysis indicates that there is no evidence of displacement. As discussed in the introduction, judging from Toch's (1092) categorization of violent inmates, one would expect to find that as much as 50% of inmate fights are displaced to other sources. However, while displacement is not evident, fights over phone use were not completely eliminated; rather, they were reduced by 47%. This finding suggests that Toch's "reactive" violent inmates desisted from fighting over phone use, whereas "proactive" inmates, whom Toch found to account for over 40% of violent inmates in his sample, have continued to fight over phone use despite the existence of the new system. Thus, displacement for these inmates was not necessary, as they persisted in fighting over phone use.

POLICY IMPLICATIONS AND FUTURE RESEARCH

Further research is necessary to determine if the reduction in phone violence continues over time. Indeed, a greater pool of data may also shed light on the question of displacement. But if phone violence has been reduced as the above analysis indicates, this suggests that situational crime prevention targeted toward specific dispute-related violence is possible and can yield significant reductions in crime. Unlike temporary crime prevention strategies, such as police crackdowns, there is no reason to believe that the effects of the new phone system will decay over time, unless the inmates somehow circumvent the new system.

These findings illustrate an example of a crime prevention measure that is less costly than the status quo. Moreover, the success of situational measures in reducing such a specific form of inmate violence as fighting over phone use suggests that situational crime prevention may also be useful in blocking other sources of inmate disputes. Instituting rules or

using new technology to restrict television use, for example, may result in similar reductions in violence.

The Department of Correction's Office of Technical Development and Project Management, the office responsible for introducing and implementing the new phone system, is not resting on its laurels. Plans are already underway to install less expensive phones combined with a voice recognition system, thereby moving the sensitive equipment on the back end of the system—and out of the reach of offenders. A voice-activated system will effectively eliminate extortion over phone use, unless the extorting inmate actually brings his victim bodily to the phone to gain access, which is highly unlikely and would probably not escape the notice of correction officers. Certainly the implementation of the new voice activated-system would merit a follow-up study.



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