

Ex. I

1 Q. I'm going to start from the beginning and ask
2 you to turn to page -- first start with 4.

3 A. Four four?

4 Q. TNXWA 4.

5 A. Okay.

6 Q. Under the product overview, it lists different
7 T-NETIX platforms. Do you see that?

8 A. I do.

9 Q. And the first one listed is the P-III.

10 A. I see that.

11 Q. Okay. And it says each of those call control
12 platforms, including the P-III --

13 A. Yeah.

14 Q. -- is comprised of three main functions: The
15 telephony interface, a validation service --

16 A. I'm sorry. Where are you -- oh, I see where
17 you're reading. I got it. Go ahead. Sorry for
18 interrupting.

19 Q. A validation service and graphical user
20 interface. Do you see that?

21 A. Yes.

22 Q. Could you describe for me what you understand
23 the P-III telephony interface to do?

24 A. Well, the telephony interface is basically the
25 call-gating function of the P-III, i.e., the -- let me

1 read this for sure before I finish answering. This is
2 -- this is -- it's the actual telephone processing
3 function that occurs, i.e., detecting and communicating
4 with the inmate, detecting -- well, I'm sorry.

5 Let me back up. The best way I can describe
6 it is the telephony portion of the functions of the
7 platform, which would include telephony connecting to
8 the inmate phone and telephony connecting to the
9 carrier, either the local exchange or directly to the
10 IXC, depending on the usage.

11 Q. You said that one of its functions is call
12 gating. What did you mean by call gating?

13 A. I would say the decision of whether or not to
14 let the call go through.

15 Q. Another function of the P-III platform is a
16 validation service. Do you see that?

17 A. Yes.

18 Q. Could you describe what the function is of the
19 validation service?

20 A. It's the -- it's the collecting of a telephone
21 number and querying of that telephone number or the
22 collecting of the inmate PIN and querying the inmate PIN
23 and, in both cases, testing the validity of those
24 numbers and the desire to let the call go out, continue
25 based on the numbers.

1 that?

2 A. I see that.

3 Q. Do you believe that that was true of the
4 system between 1996 and 2000?

5 A. Yes. I mean, it's -- that was -- it's
6 accurate.

7 Q. Do you believe that that was valuable to
8 T-NETIX?

9 A. I'm not sure what you mean by valuable to
10 T-NETIX.

11 Q. Did it have -- well, how -- let me back up for
12 a second. How did the T-NETIX system between '96 and
13 2000 do this, this automated operator eliminating the
14 need for a live operator?

15 A. Well, I think we discussed before that
16 historically there was an operator that was connecting
17 calls and making what I call the gating determination on
18 letting calls out. And so this system -- what it's
19 referring to there is the system replaced that gating
20 determination. And so, I mean, that's what the system
21 did. And that was the technical piece of equipment
22 being sold at the time, performed.

23 Q. Would you turn to page 372?

24 A. Yes.

25 Q. The section titled "system administration," do

1 career would a loss by T-NETIX in this case have?

2 A. None. My career has moved on. I am now CIO
3 of a -- of a wonderful company called Mosaic.

4 Q. Okay. Let's focus in particular on just one
5 technical area that I would like to explore. In
6 connection with one of the exhibits, you testified that
7 there was what you called a one-to-one ratio between
8 station lines and outbound trunks to the LEC.

9 A. Yes.

10 Q. Do you recall that?

11 A. I do.

12 Q. Could you explain what you mean by a
13 one-to-one ratio, please?

14 A. That in the P-III, there is no switching
15 capability whatsoever. The P-III has, for every
16 telephone attached to the system, a standard telephone
17 trunk is attached to the other side. And so what
18 happens is it's -- a single telephone -- it's called a
19 telephone one. When it goes off hook and it passes
20 through the call flow, when that telephone goes to seize
21 a telephone trunk and make a call out, it will always go
22 to trunk one. There's -- it's actually a one-to-one
23 connection.

24 Q. There are the same number of station lines as
25 there are trunks to the LEC?

1 A. That's an accurate statement.

2 Q. Does the P-III, in any of its configurations,
3 switch telephone lines?

4 A. No, it does not make any decisions about call
5 routing in any form.

6 Q. And am I correct to understand, from what you
7 just testified, that it's the one-to-one relationship
8 between station lines and trunk lines that means that
9 the P-III is not a telephone switch as you had testified
10 before?

11 MR. YOUTZ: Objection, leading.

12 A. That's perfectly accurate. There is no -- and
13 I think a couple of times I accidentally said the word
14 "switch" and took it back every time I did. There is no
15 switching capability whatsoever in the product.

16 Q. Is the word "routing calls" a function that's
17 -- is the routing of telephone calls a function you're
18 familiar with in the telecommunications industry?

19 A. Yes, it is.

20 Q. Does the P-III make any decisions as to how or
21 where to route calls?

22 A. No, it does not.

23 Q. And in your understanding, what, if any,
24 relationship is there between the functions that P-III
25 does perform and the connection of calls to the called

1 party?

2 A. I think I used the word a couple of times of a
3 gate or a gating function, and the P-III is simply
4 gating the calls prior to allowing the call to then
5 progress to the next step, which is dialing the
6 telephone number out to the public switch telephone
7 network, and the public switch telephone network then
8 performs the routing and switching functions.

9 Q. Now, just to clarify a couple of points, what,
10 if anything, were you asked either by Mr. Reinhold or
11 myself in connection with your work here to opine on as
12 to the ultimate question of whether the regulations were
13 complied with or were violated, that is, whether rate
14 quotes were, in fact, being given during the relevant
15 period?

16 A. It was not part of my testimony. What I was
17 here for was not specific to those areas.

18 Q. And what, if anything, were you asked to look
19 at with regard to the installation, operation or
20 configuration of the P-III in states other than
21 Washington state?

22 A. I was not asked to investigate anything out of
23 Washington state.

24 Q. Finally, given your role as vice president of
25 operations for all those years, are you aware of any