EXHIBIT 2

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

SANDRA JUDD, et al.,

DOCKET NO. UT-042022

Complainants,

v.

AT&T COMMUNICATIONS OF THE PACIFIC NORTHWEST, INC.; and T-NETIX, INC.,

IN SUPPORT OF COMPLAINANTS'
RESPONSE TO AT&T'S RESPONSE
JOINING T-NETIX'S MOTION FOR
SUMMARY DETERMINATION

DECLARATION OF TARA HERIVEL

Respondents.

I, TARA HERIVEL, hereby declare that:

- 1. I am personally familiar with the facts set forth in this declaration. If called to testify about any of these matters, I could and would competently testify thereto.
- 2. In October to December 1998, I received at least one inmate-initiated telephone call from Airway Heights Corrections Center, near Spokane, Washington. I received the call in my home in Seattle, Washington.
- 3. I have been unable to find a copy of my telephone bill for that time period, and I have been told that Qwest/US West does not provide copies for bills that far in the past.
- 4. Based upon my conversation with the inmate, I published an article in the Free Press, issue January-February, 1999, which leads me to believe that the

inmate-initiated telephone call occurred sometime between October to December 1998, while I was working on the article.

5. I do not recall hearing any rate disclosure information before I accepted the inmate-initiated telephone call.

I declare under penalty of perjury and in accordance with the laws of the State of Washington that the foregoing is true and correct.

Signed this _____day of May, 2005, at Seattle, Washington.

_