

[Service date: December 8, 2010]

BEFORE THE
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

SANDY JUDD and TARA HERIVEL,

Complainants,

v.

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

Respondents.

Docket No. UT – 042022

**T-NETIX, INC'S RESPONSE TO
BENCH REQUESTS NO. 14 AND 15**

Respondent T-Netix, Inc. ("T-Netix"), through counsel, submits this Response to Bench Requests No. 14 and 15. Nothing in these responses is confidential.

BENCH REQUEST NO. 14:

Did T-Netix bill, or have a third party bill on T-Netix's behalf, any consumer (as that term was defined and used in WAC 480-120-021 and WAC 480-120-141) for any intrastate operator services or operator-assisted calls placed from the four correctional institutions at issue in this proceeding between June 20, 1996 and December 31, 2000? If so, please identify the service(s) billed and provide a copy of the tariff or price list provisions in effect at that time that established the rates, terms, and conditions for the billed service(s).

RESPONSE TO BENCH REQUEST NO. 14:

T-Netix did not bill, nor did T-Netix have a third party bill on its behalf, any consumer (as that term was defined and used in WAC 480-120-021 and WAC 480-120-141) for any intrastate operator services or operator-assisted calls placed from the four correctional institutions at issue in this proceeding between June 20, 1996 and December 31, 2000. As T-Netix stated on October 6, 2010, in response to Bench Request No. 7, it was not the telephone company who carried the calls at issue in this proceeding, nor did it brand, rate, or bill the calls.

BENCH REQUEST NO. 15:

Do AT&T or T-Netix have any record of billing Ms. Herivel, or having a third party bill Ms. Herivel on its behalf, for operator services or an operator-assisted call in connection with any collect call placed from the Airway Heights correctional institution near Spokane and received by Ms. Herivel at her home in Seattle between August 26, 1997, and January 1, 1999? If so, please provide a copy of the bill(s). If a copy of the bill is unavailable, please identify the service(s) for which Ms. Herivel was billed, the amounts billed, and the date(s) on which the billed service(s) was (or were) provided.

RESPONSE TO BENCH REQUEST NO. 15:

T-Netix has researched all call records in its possession and has not found any record of billing Ms. Herivel, or having a third party bill Ms. Herivel on its behalf, for operator services or an operator-assisted call in connection with any collect call placed from the Airway Heights correctional institution near Spokane and received by Ms. Herivel at her home in Seattle between August 26, 1997, and January 1, 1999. T-Netix researched all three telephone numbers that Ms.

Herivel identified twice in response to discovery: (206) 652-9415; (360) 714-8119; and (360) 738-8903.

T-Netix is not in possession of information regarding AT&T that would enable it to answer this Bench Request on AT&T's behalf.

DATED this 8th day of December, 2010.

T-NETIX, INC.

By: 

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CERTIFICATE OF SERVICE

I hereby certify that I have this 8th day of December, 2010, served via e-filing a true and correct copy of the foregoing, with the WUTC Records Center. The original, along with the correct number of copies (5), of the foregoing document will be delivered to the WUTC, via the method(s) noted below, properly addressed as follows:

David Danner	<input type="checkbox"/>	Hand Delivered
Washington Utilities and Transportation	<input type="checkbox"/>	U.S. Mail (first-class, postage prepaid)
Commission	<input checked="" type="checkbox"/>	Overnight Mail (UPS)
1300 S Evergreen Park Drive SW	<input type="checkbox"/>	Facsimile (360) 586-1150
Olympia, WA 98504-7250	<input checked="" type="checkbox"/>	Email (records@wutc.wa.gov)

I hereby certify that I have this 8th day of December 2010, served a true and correct copy of the foregoing document upon parties of record, via the method(s) noted below, properly addressed as follows:

On Behalf Of AT&T Communications

Letty S.D. Friesen	<input type="checkbox"/>	Hand Delivered
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Confidentiality Status: Highly Confidential

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