



**Richard A. Smith**  
*Chairman of the Board, Chief Executive Officer, & President*

VIA FEDERAL EXPRESS

December 29, 2009

Ms. Carole J. Washburn, Executive Secretary  
Washington Utilities & Transportation Commission  
1300 South Evergreen Park Drive SW  
Olympia, Washington 98504

STATE OF WASHINGTON  
UTILITY AND TRANSPORTATION  
COMMISSION  
2009 DEC 30 AM 9:15  
COMMUNICATIONS MANAGEMENT

**Re: Immigration and Customs Enforcement (ICE) Inmate Telephone Service**

Dear Ms. Washburn:

Securus Technologies, Inc. (Securus), through its wholly owned subsidiaries Evercom Systems, Inc. and T-NETIX Telecommunications, Inc., currently provides Inmate Telephone Service to numerous county jails in Washington. Additionally, Securus is a subcontractor in the provision of Inmate Telephone Service for the Immigration and Customs Enforcement (ICE) facilities in the State of Washington.

Recently, Talton Communications, Inc. was awarded the contract to be the primary provider of Inmate Telephone Service for all ICE facilities. It is Securus's belief that Talton is preparing for the implementation of Inmate Telephone Service at the ICE facility located in Washington. To our knowledge the following facility will be converted over to Talton's service during January of 2010.

Northwest Detention Center – Seattle, Washington

The Inmate Telephone Service industry is a highly competitive business and Securus welcomes fair and just competition. However, it appears that Talton may be entering this competitive market without proper State regulatory approvals.

Securus has had an independent outside third party verify that Talton does not have a Business License with the Washington Secretary of State and does not currently hold a Certificate with the Washington Utilities and Transportation Commission to provide telecommunications services. Obviously, it is not proper for an Inmate Telephone Service provider such as Talton to operate without proper legal authority in the State of Washington. This is unfair to other industry competitors that incur the monetary costs and dedicate the resources necessary to obtain, and maintain, all appropriate licenses and certificates.

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Securus respectfully requests that you investigate this matter and take appropriate action to ensure all inmate telephone service providers, including Talton, are in compliance with applicable state laws and regulations.

Should you have any questions, please do not hesitate to contact me at the number listed below.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Smith", with a large, sweeping flourish extending to the right.

Rick Smith  
CEO and President  
972-277-0665