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April 25, 2005

WUTC Records Center
Washington Utilities and Transportation Commission
1300 S Evergreen Park Drive SW
PO Box 47250
Olympia, WA 98504-7250

Re: Judd and Herival v. AT&T Communications of the Pacific
Northwest, Inc. and T-Netix, Inc.
WUTC Docket No. UT-042022

To the Records Center:

Enclosed please find the Affidavit of Nancy Lee in Support of T-NETIX, Inc.s' Motion
for Summary Determination.

Very truly yours,
ATER WYNNE LLP



Susan Arellano
Assistant to Arthur A. Butler

Enclosure

BEFORE THE
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

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STATE OF WASH.
UTIL. AND TRANSP.
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

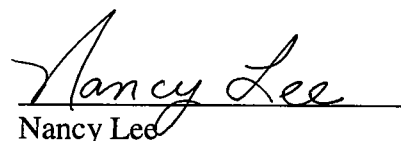
**AFFIDAVIT OF NANCY LEE IN
SUPPORT OF T-NETIX, INC.'S
MOTION FOR SUMMARY
DETERMINATION**

I, Nancy Lee, do hereby affirm the following:

1. I am the Senior Vice President for Billing Services at T-NETIX, Inc. My business address is 14651 Dallas Parkway, Suite 600, Dallas, TX 75240.
2. I have held my current position since 2003. In 1990, I became employed by Gateway, an inmate service provider acquired by T-NETIX in 1999, and served in several capacities there, including Vice President of Administration (1994) and Chief Financial Officer (1995). My previous positions at T-NETIX were Vice President of Billing Services (1999-2002) and Vice President of Strategic Planning (2002-2003).
3. I am making this affidavit in support of the Motion for Summary Determination filed by T-NETIX, Inc. in this proceeding. Specifically, I will describe the research that I supervised regarding calls placed by inmates in Washington to Ms. Sandra Judd and Ms. Tara Herivel, based on phone bills that they have provided. I will also verify the results of that research.

4. Ms. Judd has produced phone bills for the period February 26, 1996 to September 17, 2000. Ms. Herivel has produced phone bills for the period November 11, 1999 to November 30, 2000. Because these documents were voluminous, I was provided a summary of these bills that listed Ms. Judd's and Ms. Herivel's terminating phone numbers and all of the originating numbers from which inmates placed collect calls in the State of Washington.
5. I provided this summary to T-NETIX personnel that I supervise. I requested that each possible call path — originating number and terminating number — be researched to find out whether the calls were local, intraLATA, or interLATA.
6. This research was conducted by entering the originating and terminating numbers into a database. This database uses Vertical and Horizontal Coordinates (V&H Coordinates) to measure the distance of calls and categorize them as local, intraLATA, or interLATA.
7. The research conducted by my staff showed that all of the calls listed on the summary of Judd's and Herivel's bills were either local or intraLATA. None of these calls were interLATA or international calls.

I affirm, in accordance with the laws of perjury in the State of Texas, that the foregoing is true and correct.


Nancy Lee
Senior Vice President of Billing Services

SUBSCRIBED AND SWORN TO BEFORE ME this 20th day of April, 2005.



Sharon T. Beck

NOTARY PUBLIC

My Commission Expires: 10/29/2008