

Confidential Per Protective Order in WUTC Docket No. UT-042022

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

SANDRA JUDD, et al.,

Complainants,

v.

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

Respondents.

DOCKET NO. UT-042022

**DECLARATION OF JONATHAN P.
MEIER IN SUPPORT OF**

**COMPLAINANT'S RESPONSE TO T-
NETIX'S MOTION FOR SUMMARY
DETERMINATION**

-AND-

**COMPLAINANTS' RESPONSE TO T-
NETIX'S MOTION TO STAY
DISCOVERY**

-AND-

**COMPLAINANTS' CONDITIONAL
MOTION TO POSTPONE
CONSIDERATION OF T-NETIX'S
MOTION FOR SUMMARY
DETERMINATION UNTIL
COMPLAINANTS HAVE BEEN
PERMITTED ADDITIONAL
DISCOVERY**

Jonathan P. Meier declares, under penalty of perjury and in accordance with the laws of the state of Washington, that:

1. I am one of the attorneys representing the complainants Sandra Judd, Tara Herivel, and the putative class they represent in this matter. The facts stated in this declaration are based upon my personal knowledge.

2. On April 18, after T-Netix obtained a two-week extension to respond to Complainants' data requests, we were served with T-Netix's responses. T-Netix produced a limited set of documents the next day.

3. T-Netix objected to virtually all of Complainants' data requests, refused to provide a substantive response to many of the requests (including virtually all requests focusing on operator services), and answered a number of requests by stating that "responsive documents will be produced as soon as practicable." A representative sampling of T-Netix's responses in which T-Netix either refused to respond or failed to answer a direct question is attached as Exhibit A. A sampling of responses where T-Netix stated it would produce documents as soon as practicable is attached as Exhibit B.

4. On April 20, I telephoned Art Butler, counsel for T-Netix, and requested a telephone conference to hash out problems with T-Netix's discovery responses. I suggested a conference call date of April 25.

5. On April 25, Mr. Butler informed me that Stephanie Joyce, counsel for T-Netix, wanted to put off the conference until T-Netix's pending motions were decided. Ms. Joyce then explained, via email, that Complainants' lack of standing rendered discovery unnecessary.

6. I wrote back and disagreed, explaining that the Commission had not ordered a stay of discovery and that the discovery we sought was directly relevant to T-Netix's motion (as well as AT&T's pending motion).

7. I continued to exchange emails with Ms. Joyce, explaining that: (a) we believed the question of whether T-Netix provided operator services was highly relevant to the standing issue raised by T-Netix; (b) T-Netix's position that Complainants lacked standing because entities other than T-Netix carried a call was erroneous; (c) T-Netix did not have the right to shut down discovery before obtaining an order actually staying discovery; and (d) T-Netix's discovery responses were relevant to AT&T's pending motion, and we were losing valuable time to obtain discovery, prepare and take depositions, and respond to that motion. I also explained that a simple telephone call would be the most efficient way to discuss, in some depth, the various issues we had with T-Netix's failure to respond to data requests.

8. Ms. Joyce disagreed and would not make herself available for a telephone call. Instead, she suggested that I write and explain, in more detail, what the problems were with T-Netix's data requests.

9. T-Netix has not produced additional documents, nor has it supplemented its earlier responses to Complainants' data requests.

10. Obtaining discovery from AT&T has also been problematic. AT&T responded to Complainants' data requests in early April. It objected to many of the requests and did not produce any documents. AT&T had earlier (in January)

produced a very limited set of documents, almost all of which were already in Complainants' possession because they were part of the Superior Court record.

11. On April 20, I had a productive conference call with Chip Peters and Dave Scott, counsel for AT&T. I outlined, data request by data request, the problems that Complainants perceived with AT&T's responses. Mr. Peters and Mr. Scott indicated that AT&T would be producing additional relevant documents on April 25. With respect to other issues discussed on the call, they indicated they would consult with their client and get back to me. I emphasized the desirability of a prompt response.

12. On April 25, I received a letter from Dave Scott informing me that AT&T would not be producing the documents it had agreed to produce because of T-Netix's pending Motion to Stay Discovery. A copy of this letter is attached as Exhibit C.

13. I immediately left a voice mail with Chip Peters questioning the basis for the withholding of documents that he had already agreed were relevant and would be produced. Mr. Peters left a voice mail stating that he wanted to check with T-Netix's counsel before producing documents. After more time passed without any response to further queries, I wrote to Mr. Peters on April 29 and asked what was going on. A copy of this letter is attached as Exhibit D.

14. Mr. Peters wrote back on May 3, stating that AT&T was "holding off" on producing documents "because of T-Netix's concerns about disclosing highly-sensitive commercial and security information." It is also "holding off" on addressing other discovery issues. A copy of this letter is attached as Exhibit E.

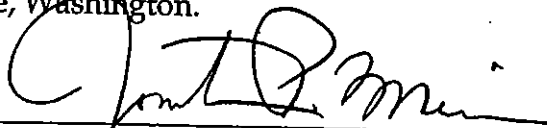
15. If the Commission concludes that a continuance of T-Netix's motion is appropriate in order to permit Complainants to obtain discovery relevant to that motion, it would be important to obtain discovery on the following subjects: (a) whether T-Netix or AT&T provided operator services; (b) where such services were provided (specific correctional facilities); (c) when such services were provided, with respect to each facility; (d) whether rate disclosure occurred in connection with the provision of operator services; and (e) if so, how it occurred.

16. Attached as Exhibit F is a true and correct copy of excerpts from an October 22, 2002 T-Netix electronic filing with the WUTC that was downloaded from the Commission's website.

17. Attached as Exhibit G is a true and correct copy of excerpts from a document produced by T-Netix in this proceeding and labeled "Price List."

18. Attached as Exhibit H is a true and correct copy of excerpts from an Agreement between T-Netix and AT&T dated June 16, 2004, produced by T-Netix in this proceeding.

Signed this 6th day of May, 2005, at Seattle, Washington.



Jonathan P. Meier

SIRIANNI YOUTZ
MEIER & SPOONEMORE
1100 Millennium Tower
719 Second Avenue
Seattle, WA 98104
Tel.: (206) 223-0303
Fax: (206) 223-0246
Attorneys for Complainants

Exhibit A

[SERVICE DATE: APRIL 18, 2005]

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 RESPONSES TO
COMPLAINANTS' FIRST SET OF
DATA REQUESTS**

Respondent T-NETIX, Inc. (T-NETIX), through counsel, hereby responds to the Complainants' First Set of Data Requests.

GENERAL OBJECTIONS

1. T-NETIX objects to each and every Request to the extent that it is not relevant or reasonably calculated to lead to the discovery of admissible evidence.
2. T-NETIX objects to each and every Request to the extent that it calls for information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

T-NETIX, INC.'S RESPONSES TO COMPLAINANTS'
FIRST DATA REQUESTS (UT-042022) - Page 1

280174/1

ATER WYNNE LLP
Lawyers
601 Union Street, Suite 5450
Seattle, Washington 98101-2327
(206) 623-4711

**WASHINGTON UTILITIES & TRANSPORTATION COMMISSION
RESPONSE TO DATA REQUEST**

Response Date: April 18, 2005
Docket No.: UT-042022
Requestor: Complainants
Respondent: T-Netix, Inc.
Prepared by: Arthur A. Butler, 206-623-4711

COMPLAINANTS' DATA REQUEST NO. 18: Were you contractually responsible for providing operator services for inmate-initiated calls from T-Netix institutions?

- (a) If so, please identify the relevant contractual language.
- (b) If not, please identify:
 - (i) which entity(ies) was responsible for this service; and
 - (ii) the contractual language making that entity(ies) responsible for providing operator services for inmate-initiated calls from T-Netix institutions.

T-NETIX'S RESPONSE TO DATA REQUEST NO. 18:

T-NETIX objects to this Request, including all subparts, on the ground that it calls for a legal conclusion as to "contractual obligations," and as to "operator services," which is a term defined by WAC 480-120-021. T-NETIX also objects on the ground that the definition of "T-NETIX institutions" is overly broad and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. T-NETIX further objects that the documents in Complainants' possession, including those produced herewith, speak for themselves.

**WASHINGTON UTILITIES & TRANSPORTATION COMMISSION
RESPONSE TO DATA REQUEST**

Response Date: April 18, 2005
Docket No.: UT-042022
Requestor: Complainants
Respondent: T-Netix, Inc.
Prepared by: Arthur A. Butler, 206-623-4711

COMPLAINANTS' DATA REQUEST NO. 28: Amendment No. 4 to the contract (Exhibit 7) states that Contractor will pay commissions of 45% "from operator-assisted intraLATA and interLATA calls" made from institutions in CenturyTel territory.

- (a) Did you provide operator services for these calls?
- (b) If not, which company did?

T-NETIX'S RESPONSE TO DATA REQUEST NO. 28:

T-NETIX objects to this Request on the ground that "operator services" is a term defined by WAC 480-120-021 and thus it seeks a legal conclusion. T-NETIX also objects on the ground that "Contractor" is defined as an entity that is not T-NETIX, and thus the Request calls for information not in the possession, custody or control of T-NETIX. T-NETIX cannot provide a response.

**WASHINGTON UTILITIES & TRANSPORTATION COMMISSION
RESPONSE TO DATA REQUEST**

Response Date: April 18, 2005
Docket No.: UT-042022
Requestor: Complainants
Respondent: T-Netix, Inc.
Prepared by: Arthur A. Butler, 206-623-4711

COMPLAINANTS' DATA REQUEST NO. 35: Do you contend that AT&T provided operator services for inmate-initiated calls from T-Netix institutions? If so, please identify language, if any, in Exhibit 7, that supports your position. Please explain why this language supports your position.

T-NETIX'S RESPONSE TO DATA REQUEST NO. 35:

T-NETIX also objects on the ground that the definition of "T-NETIX institutions" is overly broad and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. T-NETIX objects to this Request on the ground that "operator services" is a term defined by WAC 480-120-021 and thus it seeks a legal conclusion.

**WASHINGTON UTILITIES & TRANSPORTATION COMMISSION -
RESPONSE TO DATA REQUEST**

Response Date: April 18, 2005
Docket No.: UT-042022
Requestor: Complainants
Respondent: T-Netix, Inc.
Prepared by: Arthur A. Butler, 206-623-4711

COMPLAINANTS' DATA REQUEST NO. 37: Exhibit 10, page 2, states that "AT&T agrees to carry and pay commissions on all operator-assisted and sent-paid intraLATA calls originating from correctional institutions located in PTI territory in the State of Washington."

- (a) Does this language require AT&T to provide operator services for inmate-initiated calls?
- (b) Why or why not?

T-NETIX'S RESPONSE TO DATA REQUEST NO. 37:

T-NETIX objects to this Request on the ground that "operator services" is a term defined by WAC 480-120-021 and thus it seeks a legal conclusion.

WASHINGTON UTILITIES & TRANSPORTATION COMMISSION
RESPONSE TO DATA REQUEST

Response Date: April 18, 2005
Docket No.: UT-042022
Requestor: Complainants
Respondent: T-Netix, Inc.
Prepared by: Arthur A. Butler, 206-623-4711

COMPLAINANTS' DATA REQUEST NO. 38: Exhibit 10, page 2, requires the subcontractor to provide the following service: "Delivery of intraLATA and interLATA traffic originating from the Public Pay Telephones to AT&T's Point of Presence over switched access facilities." Did this language require the subcontractor to provide operator services for inmate-initiated calls from institutions covered by the subcontract? State the basis for your answer.

T-NETIX'S RESPONSE TO DATA REQUEST NO. 38:

T-NETIX objects to this Request on the ground that "operator services" is a term defined by WAC 480-120-021 and thus it seeks a legal conclusion.

**WASHINGTON UTILITIES & TRANSPORTATION COMMISSION
RESPONSE TO DATA REQUEST**

Response Date: April 18, 2005
Docket No.: UT-042022
Requestor: Complainants
Respondent: T-Netix, Inc.
Prepared by: Arthur A. Butler, 206-623-4711

COMPLAINANTS' DATA REQUEST NO. 42: Exhibit 12 states that T-Netix is to perform "administrative services required on behalf of AT&T."

- (a) Please describe the components of this responsibility.
- (b) Did this responsibility include the provisioning of operator services for inmate-initiated calls from T-Netix institutions? State the basis for your position.

T-NETIX'S RESPONSE TO DATA REQUEST NO. 42:

T-NETIX objects to subpart (b) of this Request on the ground that "operator services" is a term defined by WAC 480-120-021 and thus it seeks a legal conclusion. Subject to and without waiving any objection stated herein, T-NETIX states that "administrative services" included CDR management, deriving the charges for calls based on the carrier's rates, and collecting payment.

WASHINGTON UTILITIES & TRANSPORTATION COMMISSION
RESPONSE TO DATA REQUEST

Response Date: April 18, 2005
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Requestor: Complainants
Respondent: T-Netix, Inc.
Prepared by: Arthur A. Butler, 206-623-4711

COMPLAINANTS' DATA REQUEST NO. 48: With respect to inmate-initiated calls from T-Netix institutions, did you "verbally advise" consumers how to receive a rate quote pursuant to WAC 480-120-141(2)(b) (1999)?

- (a) If you provided this service during part of the time period that WAC 480-120-141(2)(b) (1999) was in effect, please identify which time periods you did and did not provide this service.
- (b) If you did not provide this service at all, please identify which company or entity, if any, provided this service for inmate-initiated calls from T-Netix institutions.

T-NETIX'S RESPONSE TO DATA REQUEST NO. 48:

T-NETIX objects to this Request, including all subparts, on the ground that the definition of "T-NETIX institutions" is overly broad and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. T-NETIX objects to this Request on the ground that it calls for a legal conclusion and for disclosure of privileged attorney work product. T-NETIX further objects to this Request, including all subparts, on the ground that it is not relevant to the Motion for Summary Determination filed by AT&T in this proceeding.

Exhibit B

[SERVICE DATE: APRIL 18, 2005]

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,
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Respondents.

Docket No. UT-042022

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GENERAL OBJECTIONS

1. T-NETIX objects to each and every Request to the extent that it is not relevant or reasonably calculated to lead to the discovery of admissible evidence.
2. T-NETIX objects to each and every Request to the extent that it calls for information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

T-NETIX, INC.'S RESPONSES TO COMPLAINANTS'
FIRST DATA REQUESTS (UT-042022) - Page 1

280174/1

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**WASHINGTON UTILITIES & TRANSPORTATION COMMISSION
RESPONSE TO DATA REQUEST**

Response Date: April 18, 2005
Docket No.: UT-042022
Requestor: Complainants
Respondent: T-Netix, Inc.
Prepared by: Arthur A. Butler, 206-623-4711

COMPLAINANTS' DATA REQUEST NO. 2 Please produce all documents that relate to the negotiation, interpretation, implementation, or performance of the contracts between T-Netix and AT&T relating to the provision of inmate telephone services in Washington State.

T-NETIX'S RESPONSE TO DATA REQUEST NO. 2:

T-NETIX objects to this Request on the ground that it seek "all documents" and is therefore overly broad, unduly burdensome, and oppressive. T-NETIX further objects on the ground that this Request regards "services in Washington State," rather than services in Washington Department of Corrections facilities, and therefore seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. T-NETIX further objects on the ground that many, if not all, responsive documents are in the possession of complainants. Subject to and without waiving all objections stated herein, T-NETIX states that its search for responsive documents is ongoing and all non-privileged, responsive documents will be produced as soon as practicable.

**WASHINGTON UTILITIES & TRANSPORTATION COMMISSION
RESPONSE TO DATA REQUEST**

Response Date: April 18, 2005
Docket No.: UT-042022
Requestor: Complainants
Respondent: T-Netix, Inc.
Prepared by: Arthur A. Butler, 206-623-4711

COMPLAINANTS' DATA REQUEST NO. 3: Please produce any signed versions of Exhibit 12.

T-NETIX'S RESPONSE TO DATA REQUEST NO. 3:

T-NETIX notes that Exhibit 12 was signed by T-NETIX. T-NETIX objects to this Request to the extent that it requires T-NETIX to produce documents not in its possession, custody or control. Subject to and without waiving all objections stated herein, T-NETIX states that it has conducted a diligent search for responsive documents and has found none. T-NETIX further states that its search for responsive documents is ongoing and all non-privileged, responsive documents will be produced as soon as practicable.

**WASHINGTON UTILITIES & TRANSPORTATION COMMISSION
RESPONSE TO DATA REQUEST**

Response Date: April 18, 2005
Docket No.: UT-042022
Requestor: Complainants
Respondent: T-Netix, Inc.
Prepared by: Arthur A. Butler, 206-623-4711

COMPLAINANTS' DATA REQUEST NO. 4: Please produce copies of any filings with the WUTC, with other state regulatory bodies, or with the FCC, in which you have asserted that you provide operator services for inmate telephone calls (not just "inmate-initiated calls").

T-NETIX'S RESPONSE TO DATA REQUEST NO. 4:

T-NETIX objects to this Request on the ground that it seek "any filings" and is therefore overly broad, unduly burdensome, and oppressive. T-NETIX further objects on the ground that this Request seeks documents regarding "other state regulatory bodies, or with the FCC," and therefore seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this case regarding intrastate calls placed from correctional facilities operated by the Washington Department of Corrections. T-NETIX objects to this Request on the ground that "operator services" is a term defined by WAC 480-120-021 and thus it seeks a legal conclusion. T-NETIX further objects on the ground that these documents are public filings to which complainants have access. Subject to and without waiving all objections stated herein, T-NETIX states that its search for responsive documents is ongoing and all non-privileged, responsive documents will be produced as soon as practicable.

**WASHINGTON UTILITIES & TRANSPORTATION COMMISSION
RESPONSE TO DATA REQUEST**

Response Date: April 18, 2005
Docket No.: UT-042022
Requestor: Complainants
Respondent: T-Netix, Inc.
Prepared by: Arthur A. Butler, 206-623-4711

COMPLAINANTS' DATA REQUEST NO. 5: Please produce any orders, waivers, responses, replies, or other documents that directly relate to the filings described in the preceding data request.

T-NETIX'S RESPONSE TO DATA REQUEST NO. 5:

T-NETIX objects to this Request on the ground that it seek "any orders ... or other documents" and is therefore overly broad, unduly burdensome, and oppressive. T-NETIX further objects on the ground that this Request seeks documents regarding "other state regulatory bodies, or with the FCC," and therefore seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. T-NETIX further objects on the ground that these documents are public filings to which complainants have access. Subject to and without waiving all objections stated herein, T-NETIX states that its search for responsive documents is ongoing and all non-privileged, responsive documents will be produced as soon as practicable.

Exhibit C



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CHICAGO, ILLINOIS 60606
t 312.258.5500
f 312.258.5600
www.schiffhardin.com

David C. Scott
312.258.5575
Email: dscott@schiffhardin.com

RECEIVED

APR 28 2005

LAW OFFICE OF
SIRIANNI YOUTZ
MEIER & SPOONEMORE

April 25, 2005

VIA EMAIL AND FIRST-CLASS MAIL

Jonathan P. Meier
SIRIANNI YOUTZ MEIER & SPOONEMORE
719 Second Avenue, Suite 1100
Seattle, Washington 98104

Re: *Judd, et al. v. AT&T, et al.*
WUTC Docket No. UT-042022

Dear Jon:

After our telephone conversation on April 20, 2005 regarding Plaintiffs' data requests, T-Netix, Inc. filed its Motion to Stay Discovery, dated April 21, 2005. In light of T-Netix's motion, AT&T will not be producing documents to Plaintiffs today as we discussed during our April 20 conversation, but will wait to do so until after the Motion to Stay Discovery is ruled upon by the WUTC.

Very truly yours,

David C. Scott

cc: Charles H.R. Peters (by email)
Letty S.D. Friesen (by email)
Laura Kaster (by email)
Arthur A. Butler (by email and first-class mail)
Glenn B. Manishin (by email and first-class mail)
Stephanie A. Joyce (by email and first-class mail)

Exhibit D

**SIRIANNI YOUTZ
MEIER & SPOONEMORE**

April 29, 2005

BY FACSIMILE & FIRST-CLASS MAIL
Fax No. 312.258.5600

Charles H.R. Peters
SCHIFF HARDIN LLP
6600 Sears Tower
Chicago, IL 60606

RE: Judd, et al., v. AT&T, et al.
WUTC Docket No. UT-042022

Dear Chip:

I am writing to request a response to my queries regarding the status of the discovery issues we first raised with you and David Scott on April 20. During our one-hour-plus conference call on that date, I addressed numerous deficiencies in your responses to our data requests, including AT&T's failure to produce relevant documents. You stated that you would speak with your client and would respond to the issues we raised. You also indicated you would produce documents, which were originally due on April 4 and then extended by Commission order to April 18, on April 25. Later that day (April 20), I asked you in an email when I could expect responses to the issues I raised. On April 22, having heard nothing, I left you a voice mail asking when I could expect a response.

On April 25, I received a letter from your colleague, David Scott, explaining that AT&T would not be producing the documents it had agreed to produce because T-Netix had filed a motion to stay discovery. I left another voice mail that same day asking why you believed AT&T could postpone its production of documents. You responded with a voice mail to me on April 26 stating that you believed that T-Netix could have concerns about confidential documents produced by AT&T and you wanted to check with T-Netix's counsel first. You stated you would contact me after doing so. On April 28, not having heard from you, I left another voice mail.

It is April 29 and I have still have not heard from you, nine full days after our initial conference call.

Please let me know the status of AT&T's discovery efforts.

Very truly yours,

SIRIANNI YOUTZ
MEIER & SPOONEMORE


Jonathan P. Meier

JPM:tr
cc: Clients

719 SECOND AVENUE, SUITE 1100
SEATTLE, WASHINGTON 98104
TELEPHONE: (206) 223-0303 FACSIMILE: (206) 223-0246
e-mail: jmeier@syllaw.com

Exhibit E

RECEIVED

MAY 6 2005

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Charles H.R. Peters
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Email: cpeters@schiffhardin.com

May 3, 2005

VIA EMAIL AND FIRST-CLASS MAIL

Jonathan P. Meier
SIRIANNI YOUTZ MEIER & SPOONEMORE
719 Second Avenue, Suite 1100
Seattle, Washington 98104

Re: *Judd, et al. v. AT&T, et al.*
WUTC Docket No. UT-042022

Dear Jon:

As I explained during our telephone conversation yesterday, although AT&T is holding off on producing documents while T-Netix's Motion to Stay Discovery is pending because of T-Netix's concerns about disclosing highly-sensitive commercial and security information, if the Commission denies the motion to stay, AT&T should be in a position to produce responsive documents and follow up on your further inquiries regarding Complainants' Data Requests promptly thereafter.

Very truly yours,

Charles H.R. Peters DCS

Charles H.R. Peters

cc: Letty S.D. Friesen (by email)
Laura Kaster (by email)
Glenn B. Manishin (by email and first-class mail)
Stephanie A. Joyce (by email and first-class mail)
Arthur A. Butler (by email and first-class mail)

Exhibit F

October 22, 2002
Via Electronic Filing

Ms. Carol J. Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive, S.W.
Olympia, Washington 98504-7250

RE: Application to Register as a Telecommunications Provider on Behalf of
T-NETIX, Inc.

Dear Ms. Washburn:

Enclosed for filing are the registration and Price List for T-NETIX, Inc. A hard copy of T-NETIX' current balance sheet will be sent via overnight delivery. T-NETIX' authority to provide collect only calling services for inmates in confinement institutions was granted in UT-931580 by Order issued January 26, 1994. The purpose of this registration is to request competitive classification for T-NETIX, thus making the company eligible for waiver of the regulatory requirements set forth in WAC 480-121-063(1).

Any questions you may have regarding this filing should be directed to me at (407) 740-3004. Thank you for your assistance in this matter.

Sincerely,

Robin Norton
Consultant to T-NETIX, Inc.

RN/bt

Enclosures

cc: Kendall Hollon, T-NETIX, Inc.
file: T-NETIX, Inc.- WA
tms: WAn0200

T-NETIX, Inc.

PRICE LIST
Original Page 1

T-NETIX, Inc.
1544 Valwood Parkway
Suite 102
Carrollton, Texas 75006

Regulatory Contact: Kendall Hollon, Regulatory Manager
Phone: 972-236-6945
Fax Number: 972-236-6974
E-Mail: kendall.euler@t-netix.com

A complete Copy of the Company's Price List is Available at This Website Address: www.t-netix.com

Place the service(s) will be provided: T-NETIX, Inc. ("TNI") is a common carrier providing collect-only operator assisted intrastate resale common carrier communications service by T-NETIX, Inc. ("Carrier") between various locations within the State of Washington. Service is provided only to correctional institutions.

WUTC should refer requests for information regarding consumer questions and/or complaints to the following company representative:

Name: Kendall Hollon

Title: Regulatory Manager

Phone Number 972-236-6945

Fax Number: 972-236-6974

E-Mail: kendall.euler@t-netix.com

TELECOMMUNICATIONS SERVICES THAT WILL BE PROVIDED:

<input type="checkbox"/>	Local Exchange Service	<input type="checkbox"/>	Data Services
<input type="checkbox"/>	Calling Cards	<input type="checkbox"/>	Prepaid Calling Cards
<input checked="" type="checkbox"/>	Alternate Operator Services	<input type="checkbox"/>	Directory Assistance
<input checked="" type="checkbox"/>	Long Distance Interlata	<input type="checkbox"/>	WATS (800/888)
<input checked="" type="checkbox"/>	Long Distance Intralata		
<input checked="" type="checkbox"/>	Other, please specify	Inmate Communications Services	

Indicate limitations, terms, or conditions and all rates, charges, or prices for the services being offered.

The Definitions (Section 1) are identical to the Definitions provided by the Commission except as follows:

The Definitions in Section 1 have been expanded.

Exhibit G

ORIGINAL SHEET 1

PRICE LIST - 1

T-NETIX TELECOMMUNICATIONS SERVICES, INC.

T-NETIX TELECOMMUNICATIONS SERVICES, INC.
1544 Valwood Parkway
Suite 102
Carrollton, Texas 75006

NAMING RATES FOR

RESALE COMMON CARRIER SERVICE

AS

VALUE ADDED COMMON CARRIER

Applying to Intrastate Resale Common Carrier
Communications Services Between Points
in the State of Washington

And

CONTAINING RULES AND REGULATIONS

GOVERNING SERVICE

Issued: January 10, 2001

Effective: January 20, 2001

Issued by: T-NETIX Telecommunications Services, Inc.

By: Richard Cree
President & CEO

TNXWA 00599

T-NETIX TELECOMMUNICATIONS SERVICES, INC.

REGULATIONS

1. DESCRIPTION OF SERVICE

- A. T-NETIX Telecommunications Services, Inc. is a resale common carrier providing intrastate communications long distance message toll telephone service, through automated operator assisted collect calling, to inmates of correctional institutions for the transmission and reception of communications.
- B. The Consumer's charges for Carrier's service are based upon the total time the Consumer actually uses the service.

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President & CEO

T-NETIX TELECOMMUNICATIONS SERVICES, INC.

REGULATIONS (continued)

2. LOCATIONS OF SERVICE

Communications may originate from any correctional institution within the State of Washington. Communications may terminate in any area within the State of Washington.

3. LIMITATIONS OF SERVICE

A. Service is offered subject to the availability of the necessary facilities and/or equipment and subject to the provisions of this Price List. The Carrier reserves the right not to provide service to or from a location where the necessary facilities or equipment are not available.

B. The Carrier reserves the right to discontinue service upon written notice, when necessitated by conditions beyond its control or when the Customer or Consumer is using the service in violation of the provisions of this Price List, or in violation of the law. Specific rules for the discontinuance of service may be found in WAC 480-120-081.

C. Title to all facilities provided by Carrier under these regulations remains in the Carrier.

D. T-NETIX Telecommunications Services, Inc. service provides automated collect calling capabilities to inmates of correctional institutions only. No other call type is processed or completed by the Company.

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REGULATIONS (continued)

3. LIMITATIONS OF SERVICE, continued

- E. In order to prevent fraudulent use, inmates are not allowed to reach an alternate carrier by any dialing means.
- F. Directory assistance and emergency calling are not available to inmates.
- G. At the request of the facility, collect calls to specific numbers may be screened and denied to prevent harassing telephone calls.
- H. Calls are branded and the billed party is notified that the carrier is T-NETIX Telecommunications Services, Inc.
- I. Calls to all 800, 900, and 976 telephone numbers are blocked unless specifically requested otherwise by the correctional institution.
- J. Service availability may be determined by the correctional institution such that either the allowable duration of calls, or the time of day that service is available is limited.
- K. Due to the restricted nature of its service, T-NETIX does not require its Customers (correctional institutions) to post notice regarding access to other carriers, dialing instructions to the reach local exchange company operator etc. as such notice is inappropriate.

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REGULATIONS (continued)

13. CARRIER IDENTIFICATION

- A. The Carrier's automated operators will inform the Consumer and the called party that they are using T-NETIX Telecommunications Services, Inc.'s automated Operator service at the start of each call.

- B. All local exchange companies and authorized billing agents will be provided with the proper information, such as the Carrier's address and toll free number in addition to the Carrier's name. This allows the billed party to contact T-NETIX Telecommunications Services, Inc. for billing inquiries.

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Exhibit H

CONFIDENTIAL PER
PROTECTIVE ORDER IN WUTC
DOCKET NO. UT-042022

TNXWA 00694

CONFIDENTIAL PER
PROTECTIVE ORDER IN WUTC
DOCKET NO. UT-042022

TNXWA 00716