

**BEFORE THE WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

SANDY JUDD, ET AL.	)	
Complainant,	)	
	)	Docket No. UT-042022
v.	)	
	)	
AT&T COMMUNICATIONS OF THE	)	<b>AT&amp;T'S MOTION FOR</b>
PACIFIC NORTHWEST, INC.	)	<b>EXTENSION OF TIME TO</b>
	)	<b>RESPOND OR OTHERWISE</b>
And	)	<b>ANSWER COMPLAINT</b>
	)	
T-NETIX, INC.	)	
Respondents.	)	

Pursuant to WAC 480-07-385, AT&T Communications of the Pacific Northwest, Inc. ("AT&T") hereby moves the Washington Utilities and Transportation Commission ("Commission") for an extension of time to respond or otherwise answer the complaint of the Complainant in the above-captioned proceeding. As grounds therefore, AT&T states as follows:

1. On or about November 16, 2004, Complainant's counsel sent a letter containing voluminous attachments to the Executive Secretary of the Commission. This letter alleges, among other things, that the King County Superior Court referred the question of whether AT&T is or was an Operator Service Provider ("OSP") under the Commission's regulations.
2. On November 17, 2004, and based upon Complainant's letter, the Commission issued a formal complaint and served Mary Taylor, formerly of AT&T, with the Complainant's letter and attachments. **Attachment A**, a copy of the Commission's formal complaint cover sheet.

3. In mid to late October of 2004, AT&T sent a letter to the Commission informing it that Mary Taylor was no longer with the company and it provided various names and addresses of individuals to which the Commission should redirect service and other regulatory matters. AT&T also sent the new personnel to meet with the Commission and certain Staff members on November 2, 2004.

4. WAC 480-07-370(c)(iv) states in pertinent part: “[a] respondent must answer a formal complaint within twenty days after the commission serves the formal complaint on the respondent ... .”<sup>1</sup>

5. While Ms. Taylor forwarded the complaint promptly, as noted on Attachment A, AT&T did not actually receive the complaint until November 23, 2004. As a consequence, AT&T lost valuable time that it would have otherwise had to prepare its response or answer.

6. Because AT&T does need the additional time to prepare its response or answer to the complaint, AT&T hereby moves the Commission for an extension of time up to and including December 15, 2004. Because AT&T’s request does not prejudice the Complainant in any way, the Commission should grant this request.

Respectfully submitted this 24<sup>th</sup> day of November, 2004.

**AT&T COMMUNICATIONS OF THE  
PACIFIC NORTHWEST, INC.**

By: \_\_\_\_\_

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<sup>1</sup> Cf. WAC 480-07-380(b).