

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 SUZANNE
ELLIOTT IN SUPPORT OF
COMPLAINANTS' RESPONSE TO
AT&T'S RESPONSE JOINING T-
NETIX'S MOTION FOR SUMMARY
DETERMINATION

I, SUZANNE ELLIOTT, hereby declare that:

1. I am personally familiar with the facts set forth in this declaration. If called to testify about any of these matters, I could and would competently testify thereto.
2. I am an attorney since 1982, and since 1995, my practice has included appellate representation of criminal defendants. My office is at 705 Second Avenue, Suite 1300, Seattle, WA 98104.
3. Many of my clients are inmates at various Washington state prisons. My office communicates with our clients by letter and inmate-initiated telephone calls. It is our practice to accept collect telephone calls from clients in order to communicate with them regarding their cases.

4. My office pays for the inmate-initiated telephone calls it receives as part of our representation. My office spends approximately \$ 200 per month on inmate-initiated telephone calls.

5. In particular, since 1996, my office has received inmate-initiated calls originating from Airway Heights Corrections Center, near Spokane, Washington and the Washington State Penitentiary in Walla Walla, Washington.

6. I estimate that my office has received, on average, 3-4 calls a month from Airway Heights Corrections Center since 1996.

7. I estimate that my office has received, on average, 5-10 calls a month from the Washington State Penitentiary since 1996.

8. Until the last few years, I do not recall hearing any rate disclosure information before I accepted an inmate-initiated telephone call.

9. I am willing to be a complainant in the administrative complaint pending before the Washington Utilities and Transportation Commission, *Judd et al, v. AT&T et al.*, Docket No. UT-042022.

I declare under penalty of perjury and in accordance with the laws of the State of Washington that the foregoing is true and correct.

Signed this 9th day of May, 2005, at Seattle, Washington.



SUZANNE ELLIOTT