

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

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

**PUBLIC VERSION**

I, Alan K. Schott, do hereby affirm the following:

1. I am a consultant with Cottonwood Creek Technologies, Inc. My business address is 7108 South Alton Way, Suite G102, Centennial, CO 80112.
2. I have been a telephony engineer for 19 years. From 1995 to 2004, I was Vice President of Engineering and Technology Planning for T-NETIX, Inc., and from 1986 to 1995 held various engineering positions at T-NETIX. My primary responsibilities were system architecture design and engineering management.
3. I am making this affidavit in support of the Motion for Summary Determination filed by T-NETIX in this proceeding. Specifically, I will respond to the Supplemental Declaration of Kenneth Wilson, filed May 27, 2005, to explain the error of his conclusions regarding T-NETIX equipment configuration.
4. After reviewing Mr. Wilson's Declaration, I have noticed several inaccuracies in his understanding of the T-NETIX call control platforms. First, Wilson describes the three call control scenarios discussed in his document as merely

Decl. ¶ 4.

5. Second, in Wilson's interpretation of the Adjunct platform, he characterizes the platform as

6. Third, the Adjunct and POP call control platforms are described by Wilson

7. Fourth, in his explanation of the Premise system (also called the "P-III" system), Wilson indicates that

8. The Wilson Declaration also states that

9. Mr. Wilson's statement also suggests that

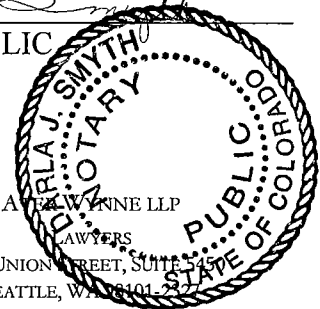
I affirm, in accordance with the laws of perjury in the State of Colorado, that the foregoing is true and correct.

  
Alan K. Schott

SUBSCRIBED AND SWORN TO BEFORE ME this 10<sup>th</sup> day of June, 2005.

  
NOTARY PUBLIC

My Commission Expires:                      My Commission Expires 03/04/2008  
8600 East Arapahoe Road  
Englewood, CO 80112



## CERTIFICATE OF SERVICE

I hereby certify that I have this 13th day of June, 2005, served the true and correct original, along with the correct number of copies, of the foregoing document upon the WUTC, via the method(s) noted below, properly addressed as follows:

Carole Washburn	<input checked="" type="checkbox"/>	Hand Delivered
Executive Secretary	<input type="checkbox"/>	U.S. Mail (first-class, postage prepaid)
Washington Utilities and Transportation Commission	<input type="checkbox"/>	Overnight Mail (UPS)
1300 S Evergreen Park Drive SW	<input type="checkbox"/>	Facsimile (360) 586-1150
Olympia, WA 98504-7250	<input checked="" type="checkbox"/>	Email (records@wutc.wa.gov)

I hereby certify that I have this 13th day of June, 2005, served a true and correct copy of the foregoing document upon parties of record, via the method(s) noted below, properly addressed as follows:

### ***On Behalf Of AT&T:***

Ms. Letty S. Friesen	<input type="checkbox"/>	Hand Delivered
AT&T Communications of the Pacific Northwest	<input type="checkbox"/>	U.S. Mail (first-class, postage prepaid)
Law Department	<input checked="" type="checkbox"/>	Overnight Mail (UPS)
919 Congress Avenue, Suite 900	<input type="checkbox"/>	Facsimile (303) 298-6301
Austin TX 78701-2444	<input checked="" type="checkbox"/>	Email (lsfriesen@att.com)

*Confidentiality Status: Highly Confidential*

### ***On Behalf Of T-Netix:***

Stephanie A. Joyce	<input type="checkbox"/>	Hand Delivered
Kelley Drye & Warren LLP	<input type="checkbox"/>	U.S. Mail (first-class, postage prepaid)
1200 19th Street NW, Suite 500	<input checked="" type="checkbox"/>	Overnight Mail (UPS)
Washington DC 20036-2423	<input type="checkbox"/>	Facsimile (202) 955-9792
	<input checked="" type="checkbox"/>	Email (sjoyce@kelleydrye.com)

*Confidentiality Status: Highly Confidential*

### ***On Behalf Of T-Netix:***

Glenn B. Manishin	<input type="checkbox"/>	Hand Delivered
Kelley Drye & Warren LLP	<input type="checkbox"/>	U.S. Mail (first-class, postage prepaid)
1200 19th Street NW, Suite 500	<input checked="" type="checkbox"/>	Overnight Mail (UPS)
Washington DC 20036-2423	<input type="checkbox"/>	Facsimile (202) 955-9792
	<input checked="" type="checkbox"/>	Email (gmanishin@kelleydrye.com)

*Confidentiality Status: Public*

**On Behalf Of Judd & Herivel:**

Jonathan P. Meier  
Sirianni Youtz Meier & Spoonemore  
719 Second Avenue, Suite 1100  
Seattle WA 98104

*Confidentiality Status: Highly Confidential*

Hand Delivered  
 U.S. Mail (first-class, postage prepaid)  
 Overnight Mail (UPS)  
 Facsimile (206) 223-0246  
 Email (jon@syllaw.com)

**On Behalf Of AT&T:**

Charles H. Peters  
Schiff Hardin LLP  
233 South Wacker Drive  
6600 Sears Tower  
Chicago IL 60606

*Confidentiality Status: Highly Confidential*

Hand Delivered  
 U.S. Mail (first-class, postage prepaid)  
 Overnight Mail (UPS)  
 Facsimile (312) 258-5600  
 Email (cpeters@schiffhardin.com)

**On Behalf Of Commission:**

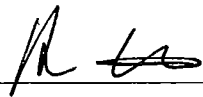
Ann E. Rendahl ALJ  
Washington Utilities and Transportation  
Commission  
1300 S Evergreen Park Drive SW  
PO Box 47250  
Olympia WA 98504-7250

*Confidentiality Status: Highly Confidential*

Hand Delivered  
 U.S. Mail (first-class, postage prepaid)  
 Overnight Mail (UPS)  
 Facsimile (360) 586-8203  
 Email (arendahl@wutc.wa.gov)

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

DATED this 13th day of June, 2005, at Seattle, Washington.

  
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