

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND)
TRANSPORTATION COMMISSION)
) DOCKET NO. UT-060962
Complainant,)
)
v.) DECLARATION OF
) JAMES F. DIONE
AT&T COMMUNICATIONS OF THE PACIFIC)
NORTHWEST, INC.)
)
Respondent.)
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I, James F. Dionne declare as follows:

1. My title is Regulatory Controller. I am Chief Financial Officer of various AT&T Communications entities, including AT&T Communications of the Pacific Northwest, Inc.

2. I understand that AT&T Communications of the Pacific Northwest, Inc. ("AT&T") provided call detail information on collect calls placed from specific correctional facilities in Washington to Staff of the Washington Utilities and Transportation Commission ("Commission"), which AT&T identified as being confidential. I further understand that Staff aggregated that information and proposes that the Commission make that aggregated data publicly available.

3. The type of data initially provided to Staff as well as the aggregated data is the type of data that AT&T generally considers confidential and it should be treated as such in this proceeding. The total number of calls placed to or from a particular location during a specific period of time is competitively sensitive information. Competitors

could use that information to assess the volume of service provided to a particular customer – or in this case institution – to determine whether to compete for that customer’s business, what types of services to offer, and the rates and terms for any such service offerings.

4. Total traffic volumes to and from a specific customer location could also be used to determine the size and type of network facilities that have been deployed to carry that traffic and serve that customer location.

I declare that the foregoing is true and correct.

Executed this 19th day of June, 2007.

By: 

JAMES F. DIONNE