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 CHRIS R. YOUTZ

Chris R. Youtz declares, under penalty of perjury and in accordance with the laws of the State of Washington, that:

1. I am one of the attorneys for complainants in this matter. I base this declaration on my personal knowledge and am competent to testify.

2. Attached as ***Exhibit A*** is a true and correct copy of T-Netix's Second Supplemental Response to Data Request No. 6.

3. Attached as ***Exhibit B*** is a true and correct copy of AT&T's Response to Data Request No. 3.

DATED: September 4, 2008, at Seattle, Washington.

Chris R. Youtz

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CERTIFICATE OF SERVICE

I certify, under penalty of perjury and in accordance with the laws of the State of Washington, that on September 4, 2008, I served a copy of the foregoing document on all counsel of record in the manner shown and at the addresses listed below:

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DATED: September 4, 2008, at Seattle, Washington.

Theresa A. Rolfes

Exhibit A

WASHINGTON UTILITIES & TRANSPORTATION COMMISSION
SUPPLEMENTAL RESPONSES TO DATA REQUESTS

Docket No.: UT-042022
Response Date: August 8, 2005
Requestor: Complainants
Respondent: T-NETIX, Inc.
Prepared by: Stephanie Joyce

COMPLAINANTS' DATA REQUEST NO. 6: Please produce all documents relating to prison or inmate security issues that are relevant to the provision of operator services for inmate-initiated calls.

T-NETIX'S RESPONSE TO DATA REQUEST NO. 6: 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 seeks documents that were not authored by T-NETIX, do not regard T-NETIX, and thus are not in the possession, custody or control of T-NETIX. 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 to this Request on the ground that it is not relevant to the Motion for Summary Determination filed by AT&T in this proceeding.

T-NETIX'S FIRST SUPPLEMENTAL RESPONSE TO DATA REQUEST NO. 6: Subject to and without waiving the foregoing objections, T-NETIX has attached additional responsive documents.

T-NETIX'S SECOND SUPPLEMENTAL RESPONSE TO DATA REQUEST NO. 6: Subject to and without waiving the foregoing objections, T-NETIX states that it is searching for and will produce any additional documents responsive to this request within its possession, custody, or control that have not already been produced in this proceeding.

WASHINGTON UTILITIES & TRANSPORTATION COMMISSION
SUPPLEMENTAL RESPONSES TO DATA REQUESTS

Docket No.: UT-042022
Response Date: August 8, 2005
Requestor: Complainants
Respondent: T-NETIX, Inc.
Prepared by: Stephanie Joyce

COMPLAINANTS' DATA REQUEST NO. 8: Please produce all relevant documents for the preceding data request.

T-NETIX'S RESPONSE TO DATA REQUEST NO. 8: T-NETIX objects to this Request on the ground that it seeks "all relevant documents" and is therefore overly broad, unduly burdensome, and oppressive. Subject to and without waiving any objections stated herein, T-NETIX has attached responsive documents.

T-NETIX'S FIRST SUPPLEMENTAL RESPONSE TO DATA REQUEST NO. 8: Subject to and without waiving any objections stated herein, T-NETIX refers Complainants to the Affidavits of Alan Schott filed June 13, June 20 and July 29, 2005. T-NETIX further refers Complainants to its Second Supplemental Response to Data Request No. 6.

WASHINGTON UTILITIES & TRANSPORTATION COMMISSION
SUPPLEMENTAL RESPONSES TO DATA REQUESTS

Docket No.: UT-042022
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Prepared by: Stephanie Joyce

COMPLAINANTS' DATA REQUEST NO. 10: Please produce all relevant documents for the preceding data request.

T-NETIX'S RESPONSE TO DATA REQUEST NO. 10: T-NETIX objects to this Request on the ground that it seek "all documents" and is therefore overly broad, unduly burdensome, and oppressive. Subject to and without waiving any objections stated herein, T-NETIX has attached responsive documents.

T-NETIX'S FIRST SUPPLEMENTAL RESPONSE TO DATA REQUEST NO. 10: Subject to and without waiving any objections stated herein, T-NETIX refers Complainants to its First Supplemental Response to Data Request No. 8.

Exhibit B

Data Request No. 1:

1. Please produce the RFP and "Combined Proposal" referred to on page 1 of the "Agreement Between State of Washington Department of Corrections and American Telephone and Telegraph Company for Installation and Operation of an Inmate Telephone System at State Correctional Institutions and Work Release Facilities" (Exhibit 7 to AT&T's Motion for Summary Determination).

Response to Data Request No. 1:

In addition to the foregoing General Objections, AT&T objects to this request on the grounds that it seeks information that, at least in part, is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, AT&T states that there are no such documents in its possession, custody, or control.

Data Request No. 2:

2. Please produce all documents that comprise part of the contracts between you and the Washington State Department of Corrections.

Response to Data Request No. 2:

Subject to and without waiving the foregoing General Objections, AT&T states that it has produced documents responsive to this request previously in this litigation and will conduct a reasonable search for and produce all other documents responsive to this request (if any) within its possession, custody, or control.

Data Request No. 3:

3. Please produce all documents that relate to the negotiation, interpretation, implementation, or performance of the contracts between you and the Washington State Department of Corrections relating to the provision of inmate telephone services in Washington State.

Response to Data Request No. 3:

In addition to the foregoing General Objections, AT&T objects to this request on the grounds that it is overly broad and seeks information that, at least in part, is neither relevant to

the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. AT&T further objects to this request to the extent it seeks information that is protected by the attorney-client privilege, work produce doctrine, or any other applicable rule or privilege. Subject to and without waiving these objections, AT&T states that it will make a reasonable effort to locate and produce documents (if any) within its possession, custody, or control that directly relate to the negotiation, interpretation, implementation, or performance of contract provisions between AT&T and the Washington Department of Corrections ("DOC") directly related to providing a connection to intrastate long-distance or local services from the Washington correctional institutions at issue in this case.

Data Request No. 4:

4. Please produce all documents that comprise any part of the contracts between AT&T and its subcontractors relating to the provision of inmate telephone services in Washington State.

Response to Data Request No. 4:

Subject to and without waiving the foregoing General Objections, AT&T states that it has produced documents responsive to this request previously in this litigation and will conduct a reasonable search for and produce all other documents responsive to this request (if any) within its possession, custody, or control.

Data Request No. 5:

5. Please produce all documents that relate to the negotiation, interpretation, implementation, or performance of the contracts between AT&T and its subcontractors relating to the provision of inmate telephone services in Washington State.

Response to Data Request No. 5:

In addition to the foregoing General Objections, AT&T objects to this request on the grounds that it is overly broad and seeks information that, at least in part, is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible