

**ATTACHMENT A**

**BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND	)	
TRANSPORTATION COMMISSION,	)	
	)	DOCKET NO. UT-060962
Complainant,	)	
v.	)	
	)	
AT&T COMMUNICATIONS OF THE	)	
PACIFIC NORTHWEST, INC.	)	
	)	
Respondent.	)	

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**AFFIDAVIT OF JOHN HYLAND**

1. I, John Hyland, being duly sworn and under oath state, I reside at 25 Ashley Loop, Fort Salonga, New York 11768. I am a retiree formerly employed by AT&T Corp., Teleport Communications Group, Inc. ("TCG") and Global Tel\*Link Corporation ("GTL").

2. I began work for AT&T Corp. in July of 1957; over the following 31 years I held various positions in operations, engineering, public relations, marketing and sales. In 1988, I left AT&T Corp. and joined TCG as the Vice President of Corporate Development. In 1998, TCG was acquired by AT&T Corp. and I, once again, joined the AT&T family.

3. While at AT&T Corp. the second time, I was Vice President of TCG Payphones, a wholly owned subsidiary of AT&T Corp. and I was a director of AT&T's National Public Markets Division.

4. The National Public Markets Division was responsible for all of AT&T's public and inmate telecommunications services. I remained in the National Public Markets Division until June 2005, when AT&T sold the Division to GTL. Upon the sale, I joined GTL, a provider of nationwide public telephone and inmate services, as its Vice Chairman. I remained in that capacity until February 2006, when I retired.

5. I understand the Commission seeks two lists from AT&T. One list should provide a compilation of information regarding miss-billed customers.<sup>1</sup> The second list seeks a compilation of information regarding those miss-billed customers that have been reimbursed.<sup>2</sup> The purpose of my affidavit is twofold: (a) to explain why AT&T Communications of the Pacific Northwest, Inc. ("AT&T") cannot provide the information the Commission requests.

6. To understand why AT&T cannot respond to the request to produce a list of miss-billed customers (assuming such a group exists), one must understand the methods employed to rate and bill inmate calls and one must understand the systems necessary to generate such a list.

7. For Washington correctional facilities, AT&T provided some long distance and toll calling only. Thus, AT&T was not the underlying "PIC'd" local carrier such that it would have had the local billing arrangements with the *collect-called* customer. Consequently, AT&T had to make special arrangements for billing these customers. In the time frame under consideration (*i.e.*, March through June of 2005), prison collect calls were rated either by T-Netix or Correctional Billing Services ("CBS")

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<sup>1</sup> The compilation includes the following: customer names, addresses, telephone numbers, and all charges related to "improperly billed collect calls from correctional facilities."

<sup>2</sup> The compilation includes the following: customer names, addresses, telephone numbers and any refunds or credits related to the "improperly billed collect calls made from correctional facilities."

for AT&T. The calls were then billed to the called party by either CBS or Zero Plus Dialing through the underlying local exchange carrier usually Qwest or Verizon.

8. In addition to the special billing arrangements, AT&T did not nor does it know the name and address of the customers. All its relevant data has ever shown is the calling and called party telephone numbers, the duration of the call, the date of the call and—after rating—the charges applied to the call. Thus, all AT&T cannot produce any names or addresses.

9. On or about June 2, 2005 AT&T transferred, pursuant to the sales contract, its systems and service associated with inmate calling in Washington State to GTL. GTL and AT&T have worked together to provide information to the Commission's Staff in regard to at least customer complaints, and AT&T anticipated that GTL would continue to work cooperatively to provide the Commission with any other information requested.

10. Generally, the former AT&T system that would have been employed to generate lists of information is called the PADD system. As AT&T no longer owns the system, it cannot generate list or provide information sought in the Commission's Order.

11. AT&T has made efforts to contact GTL seeking assistance in responding to the Commission's Order, but to date those efforts have not produced complete results.

Further the Affiant sayth not.

Dated this 14<sup>th</sup> day of August, 2006.

Aug 14 2006  
Date

John H. Highland  
Signed