

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

**DECLARATION OF ROBERT L. RAE
IN SUPPORT OF T-NETIX, INC.'S
MOTION FOR SUMMARY
DETERMINATION**

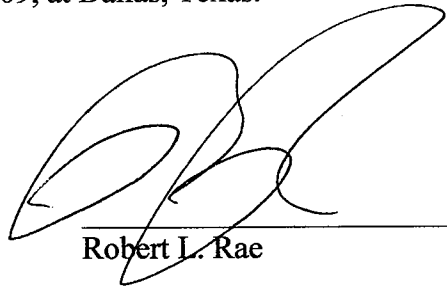
Robert L. Rae hereby declares under penalty of perjury as follows:

1. I am personally familiar with the facts set forth in this declaration. If called to testify on any of these matters, I could and would testify to them competently.
2. I am the same Robert L. Rae who previously filed a declaration dated December 12, 2008, submitted in support of T-Netix, Inc.'s Opposition to Complainants' Motion to Compel.
3. At the time I prepared my initial declaration in this case, I was Executive Vice President - Operations for Securus Technologies, Inc., parent company of T-Netix, Inc. In May of 2009, I left that position and now work for Mosaic Sales Solutions as Chief Information Officer. My new office address is 6051 N State Hwy 161, Irving, TX 75038-2236.
4. I have reviewed the "Affidavit of Alan Schott in Support of T-Netix, Inc.'s Motion for Summary Determination," dated June 10, 2005, and Exhibit 1 to T-Netix, Inc.'s Motion for Summary Determination, filed July 28, 2005, the "Supplemental Affidavit of Alan Schott in Support of T-Netix, Inc.'s Motion for Summary Determination," dated July 27, 2005.

5. It is my understanding that Mr. Schott is no longer serving as an expert witness in this matter. I have been retained as an expert by T-Netix to replace Mr. Schott.

6. Based upon my 18 years in the inmate telecommunications services industry and my operational experience at Securus and previously at Evercom Systems, I am able and prepared to testify to the facts, conclusions, and opinions set forth in the two affidavits by Mr. Schott. I hereby adopt these affidavits as if they were my own and affirm the facts, conclusions, and opinions therein to the best of my knowledge, information, and belief.

Executed under penalty of perjury and in accordance with the laws of the State of Washington this 5th day of August, 2009, at Dallas, Texas.



Robert L. Rae

CERTIFICATE OF SERVICE

I hereby certify that I have this 6th day of August, 2009, served via e-filing a true and correct copy of the foregoing, with the WUTC Records Center. The original, along with the correct number of copies (4), of the foregoing document will be delivered to the WUTC, via the method(s) noted below, properly addressed as follows:

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

I hereby certify that I have this 6th day of August, 2009, 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 Communications

Letty S.D. Friesen	<input type="checkbox"/>	Hand Delivered
AT&T Communications Law Department	<input type="checkbox"/>	U.S. Mail (first-class, postage prepaid)
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Denver CO 80205	<input checked="" type="checkbox"/>	Email (lsfriesen@att.com)

Confidentiality Status:

On Behalf Of AT&T Communications:

Charles H.R. Peters	<input type="checkbox"/>	Hand Delivered
Schiff Hardin LLP	<input type="checkbox"/>	U.S. Mail (first-class, postage prepaid)
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Chicago IL 60606	<input checked="" type="checkbox"/>	Email (cpeters@schiffhardin.com)

Confidentiality Status:

On Behalf Of T-Netix:

Glenn B. Manishin	<input type="checkbox"/>	Hand Delivered
Duane Morris LLP	<input type="checkbox"/>	U.S. Mail (first-class, postage prepaid)
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Washington DC 20004-2166	<input checked="" type="checkbox"/>	Email (gbmanishin@duanemorris.com)

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On Behalf Of Complainants :

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