EXHIBIT 21

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

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

1. I am the same Alan K. Schott who submitted affidavits on behalf of T-NETIX, Inc. ("T-NETIX") on June 13, 2005 and June 23, 2005.

2. I am making this supplemental affidavit in support of T-NETIX's Motion for Summary Determination. Specifically, I will explain why T-NETIX is not an OSP in the State of Washington.

Operator Services Historically

3. Operator services are a component of telecommunications services. They enable collect calling, third-party billing, directory assistance, person-to-person, inmate calling and other calls that required specialized handling. Operator services are generally provided by local exchange service providers (LECs) or inter-exchange service providers (IXCs).

4. Operator services historically were provided by live persons with very little automation. Before the advent of today's computerized inmate call control platforms,

calls from correctional facilities were routed to IXC or LEC operator services systems based on switches provided by AT&T/Lucent, Nortel, and others. These switches directed the inmate calls to live operators that would answer and screen the incoming inmate call.

5. Upon receiving the called party's number, the operator would then place the inmate on hold and originate a new call to the called party. The operator would then ask the called party if they wished to accept the charges for the call from the inmate. If the called party agreed to accept the charges, the operator would bridge the inmate call to the called party and the operator would be disconnected from the audio path. Call timing and call detail for billing would be performed through the carrier's operator services switch.

Modern Operator Services in the Inmate Market

6. In the inmate market, carriers and service providers such as AT&T, MCI, GTE, US West, and others, require specialized call control features to deliver their operator services to the corrections industry. Until the late 1980s, these specialized features were primarily provided by live operators. Around this time, automated systems began to emerge in the inmate market.

7. As inmates began making increasingly more telephone calls, correctional authorities requested new features that would help them monitor and restrict these calls to protect public safety. As the list of specialized requirements for inmate call controls grew, it became apparent that standard operator services-capable switches then deployed in the networks of most carriers or operator services providers, did not have the ability to deliver these specialized features in a cost effective manner. Live operators were also a

weak link in this scenario since inmates were frequently able to threaten operators into placing illicit calls.

8. To address this market, several call control platform providers such as T-NETIX, Gateway, TeleQuip, and others, developed customized platforms to fill this industry's requirements. These platforms could effectively replace the call control functionality of the live operators and the operator services switch with automated inmate-specific applications. Local exchange carriers ("LECs"), such as US West, and inter-exchange carriers ("IXCs"), such as AT&T, have since converted most of their inmate operator services from live operators to automated operator services platforms.

9. Processing inmate calls requires special security features to ensure that inmates are not able to harass the general public, perform illegal or fraudulent telephone activities in the outside world, or intimidate witnesses and the law enforcement community. Call control platforms replaced the live operator system with automated, computerized systems that utilized synthesized or prerecorded voice prompts to instruct the inmates and called parties on how to use the service.

10. The platforms also allow the calls to be validated through multiple database tables and apply specialized features to the call including the ability to limit call durations, impose time-of-day restrictions, provide PIN-based calling, detect fraudulent events such as 3-way calling, providing operational prompts, and employ a host of other restrictions.

T-NETIX Platform Features

11. In T-NETIX's role as an equipment supplier in Washington, it provided the call control equipment and support functions to OSPs as a vendor, as in a similar manner that

Lucent provides 5ESS OSPS-enabled (Operator Services Position System) switches and switch maintenance to AT&T and other carriers.

12. The product that T-NETIX delivered to operator services providers was comprised of a customized call control platform and the associated support functions required to maintain the call control platforms. The call control platforms consisted of customized computer-based telephony control cards that were controlled by proprietary software modules. Major support functions provided by T-NETIX to maintain the call control platforms included:

a. Installation and de-installation of call control platforms at sites specified by the contracted services provider

b. Performing periodic diagnostic checks and housekeeping functions

c. Implementing changes in call restrictions dictated by the services provider and their customer (in this context, the "customer" is the correctional facility)

d. Formatting call records for the services provider so they could bill the calls

e. Providing on-site personnel at larger sites to administer the equipment

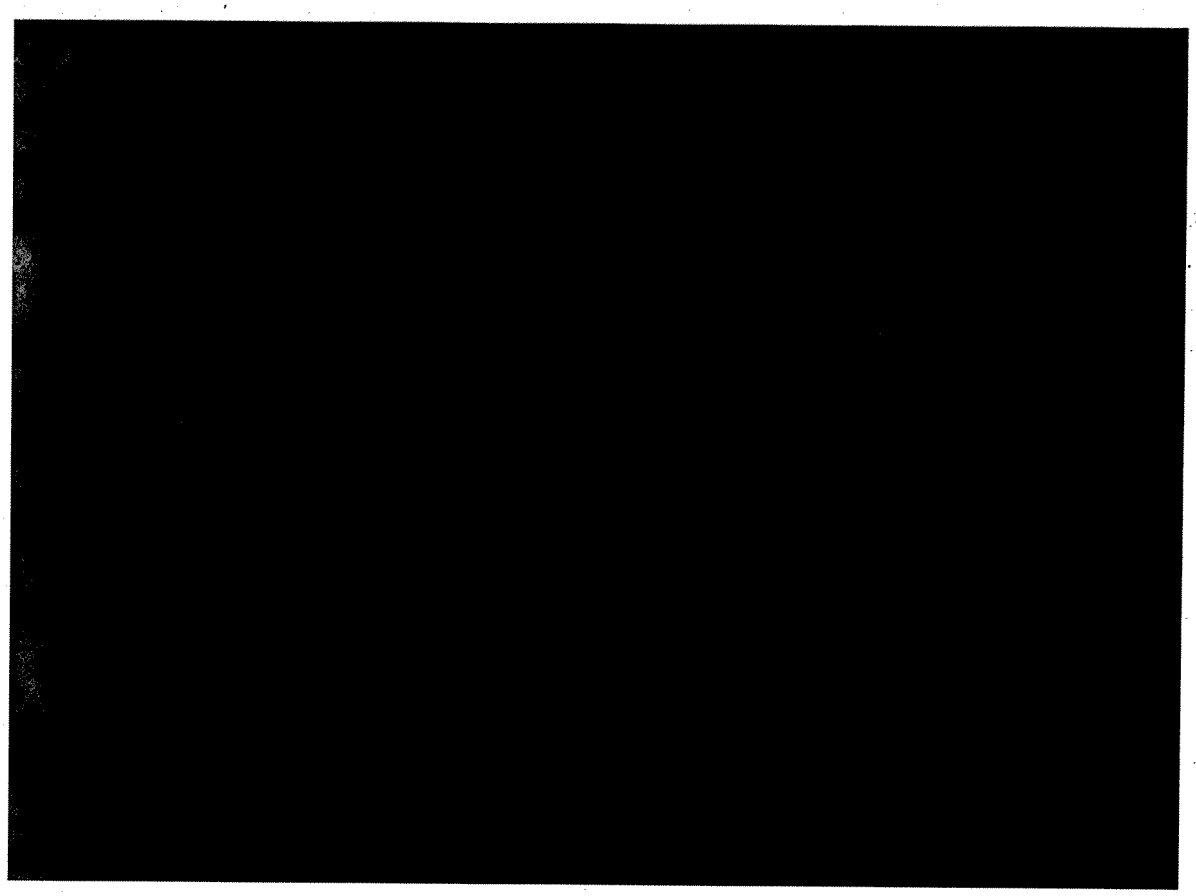
13. In Washington, the P-III platform handled all local and intra-LATA inmate calls from the original installation date through 2000. The P-III is an on-premise platform typically installed on-site at the correctional facility in a location that provides access to the facility's inmate station wiring and the outbound network trunks. Inmate telephone station sets are typically provided, installed, and maintained by the contracted operator services provider or their subcontractor. [redacted]

14. The T-NETIX platform's function was to simply apply the calling restrictions to each call as specified by the contracted service provider and their customer (the facility). The connection between the inmate and the called party was ultimately accomplished over a transport network provided by the operator services provider, or their contracted carrier.

P-III Network Configuration

15. The P-III platform operated at the [redacted] sites through the end of 2000 or later. A typical network configuration for a P-III installation is shown on the following page [figure omitted from Public Version]:

FIGURE 1



16. This figure shows that T-NETIX's equipment is outside the public switched telephone network. [redacted] All calls – local, intra-LATA and inter-LATA – must hit the LEC switch and be routed from there.

17. The figure also shows that the LEC and IXC generate and send all bills for inmate calls, as I explain in more detail below.

Call Path of an Inmate-Originated Call

18. A typical call flow for a T-NETIX P-III premise-based call control platform is as follows:

a. Inmate lifts the station handset [redacted]

b. Inmate dials the desired destination number and if required, a Personal Identification Number (PIN).

c. Platform validates the destination number and PIN, if required, using several database tables.

d. If the platform allows the call, the automated voice prompts the inmate to record his name. If the platform denies the call, the automated voice will play a rejection message to the inmate and return simulated dial tone to allow another attempt.

e. A valid call will cause the platform to seize the dedicated outbound trunk and listen for true dialtone from the serving end office (LEC). When the platform

validates the presence of battery and dialtone from the serving end office, it will then outpulse the destination number.

f. Based on the destination number, the LEC end office switch will route the call to either an IXC switch for termination to an inter-LATA destination, or route to a LEC switch for termination to an intra-LATA destination number.

g. If the called party (destination number) answers the call, the carriers transporting the call (LEC and possibly IXC) will connect the call from the facility platform to the called party utilizing carrier transport. The platform's automated voice will announce that they have received a call from an inmate (platform plays the inmate's actual pre-recorded name) and then prompts the called party on the procedure to accept the call. The audio path during this acceptance mode is configured such that the inmate and the called party cannot yet converse.

h. If the called party accepts the call, [redacted] the platform will configure the audio paths to allow two-way conversation between the inmate and called party.

i. The platform will provide call timing and perform multiple fraud detection tests throughout the duration of the call.

j. When the call has ended, the platform will record the call detail that includes start time, stop time, date, origination number, terminating (destination) number, call acceptance flags, and other validation information.

k. Call detail data is downloaded periodically from the platform to a centralized data center where it is formatted and sent to the LEC or IXC that owns that traffic.

19. The information about the call, known as a call detail record ("CDR"), is stored by the T-NETIX platform to be used later by the operator services provider to produce the 0+ call records. (Although the T-NETIX platform stores the inmate's call detail for subsequent 0+ billing, the call was outpulsed over the provider's network as a 1+ call.) The call records are periodically downloaded to the T-NETIX data center where they are formatted to a specification dictated by the customer (typically the LEC or IXC that was contracted to provide the inmate calling service).

20. In the case of an intra-LATA call, T-NETIX transmits the CDRs to the LEC, which are then used by the LEC to calculate the total charge and applicable taxes. The call is listed as a call carried by the LEC, and the billed party remits payment to the LEC. For an inter-LATA call, the CDRs would be sent to the IXC for processing and billing. The carriers may use a billing service to perform this bill creation function. The carrier customer is then responsible for sending the bill to the called party that accepted the call.

21. In situations where the LEC or IXC is the prime inmate calling contractor, they set the call rates, paid for transport, and were responsible for billing the calls to the end users. T-NETIX simply provides the call control platform and support/maintenance services for the call control platform. In this scenario, T-NETIX is simply a present-day equipment and equipment support provider to the carriers just as Lucent/AT&T, Nortel, etc., provide operator services-enabled switches in other segments of the

telecommunications market, and just as they provided support for the live operator-based inmate services of the past.

Summary

22. In summary, T-NETIX inmate products were initially developed in the late 1980s to provide an improved technology for controlling inmate calls that were currently being processed by the carriers using live operators. As carriers began to realize that the live operators could not deliver the complex control features that were being offered by the new platforms such as the T-NETIX P-III, they began to contract with T-NETIX in order to use T-NETIX's P-III platforms and replace the live operators and operator services switch functions. T-NETIX acts as a vendor to these carriers to enable them to provide telephone service to correctional facilities.

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 27th day of July, 2005.

Jackie Heinrich
NOTARY PUBLIC

My Commission Expires: 3/25/06

JACKIE HEINRICH NOTARY PUBLIC STATE OF COLORADO
My Commission Expires 3/25/2006
8600 E. Arapahoe Road