

EXHIBIT 13

WASHINGTON UTILITIES & TRANSPORTATION COMMISSION
RESPONSES TO SECOND DATA REQUESTS

Docket No.: UT-042022
Response Date: November 17, 2008
Requestor: AT&T
Respondent: T-Netix, Inc.
Prepared by: Joseph Ferretti

AT&T's Second Data Request No. 11: Describe in as much detail as possible the process by which rate disclosures were made to recipients of telephone calls from inmates at Washington state prisons where T-Netix provided equipment or services, and identify the person(s) most knowledgeable about this process.

T-Netix's Response to Second Data Request No. 11:

T-Netix objects to this Request on the ground that the term "Washington state prisons" improperly refers to all "reformatories, prisons, jails, or other correctional facilities in the State of Washington" rather than the three facilities identified by Complainants as originating the inmate collect calls at issue in this proceeding. Therefore, the Request is overly broad, unduly burdensome and expensive, oppressive, and not relevant or reasonably calculated to lead to the discovery of admissible evidence.

T-Netix further objects to this Request on the ground that the defined term "relevant period" improperly refers to "January 1, 1996 to the present" rather than from June 20, 1996 through December 31, 2000. According to telephone records that Complainants produced in response to T-Netix First Data Request No. 2, the latest month during which complainants received inmate collect calls for which they allege no prerecorded rate information was provided is November 2000. Therefore, the Request is overly broad, unduly burdensome and expensive, oppressive, and not relevant or reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving these objections, T-Netix responds that rate disclosures were made available at Washington State correctional facilities by voice prompt or by voice response message. Upon information and belief, AT&T supplied the rates to be loaded by T-Netix onto computer cards that were installed into the premise-based equipment. The rates loaded into the system were AT&T rates and were those used for providing rate quotes. If a customer requested a rate quote, or if AT&T as the common carrier and telecommunications service provider for the facilities in question requested that rates be quoted on all calls, T-Netix would have been able to configure the system to provide the rate quote via a voice recording. Upon information and belief, individuals who may have knowledge of the facts described in this Response are Scott Passe, Engineer/System Architect; Ken Rose, Field Supervisor for Technicians; Gary Skinner, Manufacturing Engineer; and Alice Clements.