

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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

AT&T Communications of the Pacific Northwest, Inc. ("AT&T") provides the following response to the Commission's Order to Produce Records ("Order").

1. The Commission's Order requires that AT&T produce two lists. The first list includes the following:

A list of all Washington customers that were improperly billed by AT&T, or on behalf of AT&T (e.g., by Zero Plus Dialing Inc. or Global Tel*Link Corporation), for correctional facility collect calls made during March, April, May, and June 2005. The list must include customers' names, addresses, telephone numbers, and all charges related to the improperly billed collect calls made from correctional facilities.¹

As a preliminary matter, AT&T does not possess the requested information nor can AT&T generate such a list based on the information in AT&T's possession.² The records and systems necessary to produce such a list are owned and controlled by Global Tel*Link Corporation ("GTL"), not AT&T. Indeed, AT&T has never known or possessed the names and addresses of customers as a part of its accounts, books, papers

¹ Order at 2, ¶ 6.

² The list assumes there is a problem in billing that AT&T is not currently aware actually existed beyond the three complaints received from the Commission, only two of which appeared to be actually mis-billed.

and documents. The attached Affidavit describes generally the prison collect service rating and billing along with the systems that AT&T formerly possessed, that are now owned by GTL. *See Attachment A.*

2. Although AT&T does not possess the information the Commission seeks, AT&T has diligently made its best efforts to obtain that information from GTL, including taking the following actions:

- In April of 2006, and in connection with the complaints from Richard and Janice Laxton and Rochelle Brickman, AT&T requested that Lynda Gaston of GTL research whether there exists or existed a number of customers that had been miss-billed;
- On July 25, 2006, AT&T sent a follow-up e-mail to Lynda Gaston of GTL and Kelly Snyder of Securus again requesting assistance in determining whether there existed any billing inaccuracies;
- On August 3, 2006, AT&T sent a letter to Teresa Ridgeway and Brian Oliver of GTL enclosing the Commission's Order and asking for their assistance in responding;
- Having received no response from GTL on the above-noted requests, on August 11, 2006 AT&T called Teresa Ridgeway and her assistant and left messages for both requesting assistance.
- On August 11, 2006, AT&T also faxed a copy of the letter to the Chief Financial Officer, the General Counsel and James W. Ross, Esq. pursuant to the sales contract; and
- Finally on August 14, 2006 AT&T was able to reach Craig Ferguson, Chief Operating Office who said he would assist AT&T and subsequently had Teresa Ridgeway contact AT&T.

3. GTL currently is gathering the information responsive to the Commission's Order but has yet to provide any of that information to AT&T. AT&T will continue to work with GTL to provide as much of the information sought as possible. Based on its latest contacts with GTL, AT&T anticipates that it will be able to provide a substantive response from GTL by no later than Friday, August 18.

4. The second list the Commission seeks in its Order is the following:

A list of all Washington customers that received a refund or a credit from AT&T for the improperly billed calls by AT&T, or on behalf of AT&T, for correctional facility collect calls made during March, April, May, and June 2005. The list must include the customers' names, addresses, telephone numbers, and any refunds or credits related to improperly billed collect calls made from correctional facilities.³

AT&T has previously provided the Commission with the only list that AT&T has, which is based upon the customer complaints to the Commission. AT&T is unaware of any additional responsive information, but has sought such information from GTL as part of requesting GTL's assistance in responding to the Commission's Order. AT&T anticipates that the substantive response provided on Friday, August 18, will include any additional information that is responsive to this aspect of the Commission's Order.

Respectfully submitted this 15th day of August, 2006.

**AT&T COMMUNICATIONS OF
THE PACIFIC NORTHWEST,
INC.**



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³ Order at 2 – 3, ¶ 7.