

EXHIBIT 8

WASHINGTON UTILITIES & TRANSPORTATION COMMISSION
RESPONSES TO SECOND DATA REQUESTS

Docket No.: UT-042022
Response Date: December 12, 2008
Requestor: AT&T
Respondent: T-Netix, Inc.
Prepared by: Joseph Ferretti

AT&T's Second Data Request No. 18: Describe in as much detail as possible the process by which an intrastate, interLATA call from a payphone at a Washington state prison was processed from caller to call-recipient, specifying in particular who connected the call from the point of origin to the service provider and what hardware or software was used to process the call.

T-Netix's Response to Second Data Request No. 18:

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 institutions identified by Complainants as originating the inmate collect calls at issue in this litigation. 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 incorporates by reference the objections set forth in and its response to Second Data Request No. 16. The only difference between the processing of a local call and long-distance call, whether intrastate or interstate, was whether the LEC completed the call or routed it to the applicable interLATA carrier for connection to the dialed number. If AT&T as the interLATA carrier for the relevant Washington State correctional institutions had direct circuits terminating on a separate Network Interface with which the T-Netix premise equipment was interconnected, T-Netix would route an interLATA call to the NI, from which it would be connected to the dialed number by AT&T and whichever carrier(s) it utilized to provide terminating switched access.

T-Netix's Amended Response to Second Data Request No. 18:

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 four institutions identified by Complainants as originating the

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T-Netix in addition states that it is aware of no facts from on which it can base a conclusion that AT&T utilized direct circuits or special access services at any Washington State correctional facility to which AT&T provided services. It is T-Netix’s belief that, in each instance, calls were transported to AT&T over the LEC’s intrastate switched access service and connected thereby to AT&T’s POP and long-distance network.