

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

SANDY JUDD, and TARA HERIVEL,

Complainants,

v.

AT&T COMMUNICATION OF THE PACIFIC
NORTHWEST, INC., and T-NETIX, INC.,

Respondents.

Docket No. UT-042022

**AT&T'S RESPONSE TO BENCH
REQUEST NO. 2**

Respondent, AT&T Communication of the Pacific Northwest, Inc. ("AT&T"), hereby submits this Response to Bench Request No. 2.

Bench Request No. 2 seeks:

In paragraph 20 of its Amended Motion, AT&T claims, *inter alia*, that it was certified as a local exchange carrier (LEC) from 1996 to the present. In the Affidavit of Frances M. Gutierrez, sponsored by AT&T, Ms. Gutierrez states that AT&T was certified a LEC by the Commission in January of 1997.

- (a) Please indicate why there is a discrepancy in these two dates, and please provide the exact date of Commission certification.
- (b) Please provide a copy of the LEC certificate issued by the Commission, if the company still possesses it, and if not, please state why not. Please provide the docket number under which the Commission processed the LEC application.
- (c) In addition, please state whether and when that certificate was revoked or surrendered, and the corresponding docket number(s).

AT&T Responds:

- (a) Please indicate why there is a discrepancy in these two dates, and please provide the exact date of Commission certification.

Initially, AT&T was authorized to provide interexchange telecommunications service in Washington. In June of 1987, the Commission granted AT&T classification as a

“competitive” telecommunications company in Cause No. U-86-113. In February 1996, AT&T filed a petition seeking to amend its classification to include the provision of local exchange service, and the Commission granted the petition on January 24, 1997 in Docket No. UT-960248.

In its Amended Motion, it appears that AT&T inadvertently dated its certification back to the 1996 petition date rather than the 1997 order date. Thus, Ms. Gutierrez’s affidavit contains the correct date. AT&T apologizes for any confusion that mistake may have caused.

(b) Please provide a copy of the LEC certificate issued by the Commission, if the company still possesses it, and if not, please state why not. Please provide the docket number under which the Commission processed the LEC application.

A copy of the AT&T LEC certification is attached hereto as **Exhibit A**. The docket number containing that certification is UT-960248.

(b) In addition, please state whether and when that certificate was revoked or surrendered, and the corresponding docket number(s).

AT&T has not surrendered its certification nor has the Commission revoked it.

Respectfully submitted this 15th day of January, 2009.

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

Letty S.D. Friesen by Doc with permission

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