

Honorable John C. Coughenour

CV 00-01596 #00000028

CC TO JUDGE DJ
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AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,

Plaintiff,

v.

AMERICAN SEAFOODS COMPANY,

Defendant

CONNIE L MARTIN,

Plaintiff-in-Intervention.

NO C00-1596C

DECLARATION OF TAMMY FRENCH
IN SUPPORT OF AMERICAN
SEAFOODS COMPANY'S MOTION FOR
PARTIAL SUMMARY JUDGMENT

Noted for. August 31, 2001

TAMMY FRENCH declares as follows:

1. I am Vice President of Human Resources at American Seafoods Company ("ASC")

2. I understand that Connie Martin was scheduled to work as a cook aboard the KATIE ANN, during the "A" fishing season of 1999, which commenced in January of that year

3. I understand that, on December 21, 1998, ASC sent a mailing to its crew members, including Ms. Martin, indicating when and where to report to work for the

DECLARATION OF TAMMY FRENCH IN SUPPORT OF
AMERICAN SEAFOODS COMPANY'S MOTION FOR
PARTIAL SUMMARY JUDGMENT - 1

MUNDT MACGREGOR LLP
ATTORNEYS AT LAW

999 Third Avenue Suite 4200 Seattle, Washington 98104-4082
Telephone (206) 624-5950

1
2 1999 A season. Attached as Exhibit A is a true and correct copy of this mailing. I
3 understand that "key crew" members for the KATIE ANN were to report to work in
4 Seattle on January 14, 1999. As a cook, Ms. Martin was a "key crew" member

5 4. Ultimately, someone other than Ms. Martin worked as the cook
6 aboard the KATIE ANN for the 1999 A season

7 5 Attached as Exhibit B are true and correct copies of ASC's records for
8 outgoing telephone calls for December 15, 1998 to January 15, 1999. Attached as Exhibit C
9 is a true and correct copy of ASC's record for incoming toll-free calls for the same period. I
10 understand that these phone records reflect all such calls between our office and Salmon,
11 Idaho from December 15, 1998 to January 15, 1999. I understand that Connie Martin's
12 home telephone number in Salmon, Idaho is (208) 756-4059.

13 I declare under penalty of perjury under the laws of the State of Washington
14 that the foregoing is true and correct.

15 DATED in Seattle, Washington this 7th day of August, 2001

16 see attached signature page

17 TAMMY FRENCH

18 \\JCT\PLEADINGS\PDEC\FRENCH-1058-138A.DOC
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2 1999 A season. Attached as Exhibit A is a true and correct copy of this mailing. I
3 understand that "key crew" members for the KATIE ANN were to report to work in
4 Seattle on January 14, 1999. As a cook, Ms. Martin was a "key crew" member.

5 4. Ultimately, someone other than Ms. Martin worked as the cook
6 aboard the KATIE ANN for the 1999 A season.

7 5. Attached as Exhibit B are true and correct copies of ASC's records for
8 outgoing telephone calls for December 15, 1998 to January 15, 1999. Attached as Exhibit C
9 is a true and correct copy of ASC's record for incoming toll-free calls for the same period. I
10 understand that these phone records reflect all such calls between our office and Salmon,
11 Idaho from December 15, 1998 to January 15, 1999. I understand that Connie Martin's
12 home telephone number in Salmon, Idaho is (208) 756-4059.

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14 that the foregoing is true and correct.

15 DATED in Seattle, Washington this 7th day of August, 2001.

16 
17 TAMMY FRENCH

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DECLARATION OF TAMMY FRENCH IN SUPPORT OF
AMERICAN SEAFOODS COMPANY'S MOTION FOR
PARTIAL SUMMARY JUDGMENT - 2

MUNDT MACGREGOR LLP
ATTORNEYS AT LAW

TOTAL P.03

**American Seafoods Company**

December 21, 1998

Dear Key Crewmember:

Greetings from the American Seafoods Company office! The 1999 Pollock "A" Season is coming up soon and we wanted to update you on recent changes in the industry, schedules for the vessels, mandatory training and meetings, and a few other issues.

We indicated in our last crew meeting that the offshore industry was discussing the development of a Pollock Conservation Cooperative. There are several benefits of a cooperative arrangement but the primary benefits include a slower, more deliberate harvesting schedule, improved resource utilization, higher quality and safer operating conditions. For all these reasons, American Seafoods Company was in favor of such an agreement if the right terms could be reached. This week, all of the at-sea processing companies were successful in reaching an agreement to form a Pollock Conservation Cooperative.

With this new operating scenario scheduled to take place in A season 1999, we had to quickly formulate a strategy to maximize our operational and fishing efficiencies. The most significant decision we have made is to operate fewer vessels and after careful analysis, we have chosen not to operate the American Dynasty for the 1999 A season. The six remaining vessels will operate under a revised schedule as dictated by recent changes by North Pacific fisheries management. The A season will be split into two fishing periods with a mandatory 5 day stand down period between them. A1 will begin January 20, 1999 and A2 will begin February 20, 1999. There will also be a B season and C season, B opening August 1, 1999 and C opening September 15, 1999. The Aleutian Island area will be closed to directed fishing.

With so many changes in the industry and many uncertainties still ahead, American Seafoods Company must change some of our business practices. One major change for Key Crewmembers will be seasonal daily rate contracts offered for the 1999 Pollock A season. There will be no annual guarantee of days for 1999. The daily rates and hourly shipyard rates for Pollock A season will remain the same as the rates that were paid for 1998. Those crewmembers currently covered under our insurance program will continue to be insured.

Contracts for Key Crewmembers will be signed according to the enclosed schedule. Please remember to bring your identification and a voided check if you will be electing electronic deposit of funds for your payroll. Enclosed you will also find a schedule for the vessels crew up and departures, as well as schedules for numerous training sessions and meetings for many of the key positions. We are instituting a Hearing Conservation Program and will be performing base-line hearing tests on all deck, engine, and factory key crew in conjunction with contract signing. The meetings and training sessions prior to the season are vital to the continued success of American Seafoods Company and your professional development. Some courses require mandatory attendance to meet our legal requirements, others are intended to help you succeed in a very challenging working environment. In either case, you are accountable to know and apply the material covered in the meetings for which you are scheduled. It is important that you clock in and out for these meetings, as well as signing in on the sign up sheets that will be available at all meetings to ensure that you are paid in a timely manner.

If you have questions, please contact your Vessel Operations Manager or Renee Vargas. We wish you a very special holiday season and peace and prosperity in the New Year.

Sincerely,


Renee J. Vargas
Vessel Personnel Manager**EXHIBIT**A

American Seafoods Company

<u>Type of Meeting</u>	<u>Who needs to attend</u>	<u>Date</u>	<u>Time</u>	<u>Location</u>
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CONTRACT SIGNING: YOU NEED TO AGREE TO THE DATE OF MEETINGS

Ocean Rover (Crew up is January 14)	All Key Crew	13-Jan 1000-1400	Mt. Club
American Triumph (Crew up is January 14)	All Key Crew	13-Jan 1000-1400	Mt. Club
Northern Eagle (Crew up is January 17)	All Key Crew	14-Jan 0800-1200	Mt. Club
Northern Hawk (Crew up is January 16)	All Key Crew	14-Jan 0800-1200	Mt. Club
Northern Jaeger (Crew up is January 16)	All Key Crew	14-Jan 1200-1600	Mt. Club
Katie Ann (Crew up is January 17)	All Key Crew	14-Jan 1200-1600	Mt. Club

AT&T UniPlan® Service - MEGACOM® Plus



AT&T UniPlan® SERVICE CENTER CALL - 1 800 413-5410

Call Detail

Account Number				Bill Date			
171 777-5733 959				Jan 16, 1999			
Subaccount Number				Account Code			
146 565-7412 249				075445			
Calls Billed To Line 206 178-1711							
Direct Dial - Interstate							
1	12-15	3:03P TO VAN NUYS	CA 818 997-7318	1:14	DD	D	0.11
2	12-15	3:15P TO SACRAMENTO	CA 916 339-1915	0:53	DD	D	0.08
3	12-16	3:46P TO COERDALENE	ID 208 667-7935	0:39	DD	D	0.06
4	12-16	3:47P TO SUTTER CRK	CA 209 267-5073	0:40	DD	D	0.06
5	12-16	3:53P TO ANCHORAGE	AK 907 333-9054	1:50	DD	D	0.16
6	12-17	10:07A TO SAN DIEGO	CA 619 544-0164	2:30	DD	D	0.22
7	12-17	1:11P TO SANTA ANA	CA 714 285-9704	0:48	DD	D	0.08
8	12-17	1:19P TO ANCHORAGE	AK 907 338-2515	1:04	DD	D	0.10
9	12-17	1:21P TO EAGLERIVER	AK 907 694-5614	1:25	DD	D	0.12
10	12-17	1:29P TO KODIAK	AK 907 486-5246	1:56	DD	D	0.17
11	12-18	2:49P TO BROOKLYN	NY 718 853-6769	0:51	DD	D	0.08
12	12-18	3:21P TO PEORIA	IL 309 692-7985	1:27	DD	D	0.13
13	12-18	3:23P TO TUCSON	AZ 520 294-9582	0:39	DD	D	0.06
14	12-18	3:27P TO ANCHORAGE	AK 907 563-5603	0:30	DD	D	0.04
15	12-18	3:29P TO KODIAK	AK 907 486-1714	0:40	DD	D	0.06
16	12-22	8:41A TO VAN NUYS	CA 818 948-1948	0:30	DD	D	0.04
17	12-22	12:21P TO VAN NUYS	CA 818 948-1948	0:30	DD	D	0.04
18	12-22	2:27P TO PROVIDENCE	RI 401 421-9475	2:18	DD	D	0.20
19	12-22	4:01P TO VAN NUYS	CA 818 948-1948	0:30	DD	D	0.04
20	12-28	10:01A TO ANCHORAGE	AK 907 279-0087	0:30	DD	D	0.04
21	12-28	10:08A TO ANCHORAGE	AK 907 243-7960	0:35	DD	D	0.05
22	12-28	10:09A TO MENTONE	CA 909 794-9622	2:11	DD	D	0.19
23	12-28	10:12A TO CHICO	CA 530 893-4970	1:48	DD	D	0.16
24	12-28	10:36A TO RAINIER	OR 503 556-2575	0:30	DD	D	0.04
25	12-28	10:37A TO COERDALENE	ID 208 664-6022	0:30	DD	D	0.06
26	12-28	10:52A TO PEORIA	IL 309 692-7985	1:52	DD	D	0.16
27	12-28	10:56A TO KODIAK	AK 907 486-5246	1:59	DD	D	0.17
28	12-28	11:01A TO KODIAK	AK 907 486-1714	0:47	DD	D	0.07
29	12-28	11:42A TO OCEAN CITY	NJ 609 525-0293	1:39	DD	D	0.15
30	12-28	12:02P TO OKLA CITY	OK 405 239-6044	0:31	DD	D	0.05
31	12-28	12:34P TO ANCHORAGE	AK 907 562-4485	2:21	DD	D	0.20
32	12-28	2:19P TO ANCHORAGE	AK 907 243-0223	0:37	DD	D	0.06
33	12-28	2:20P TO ANCHORAGE	AK 907 258-8112	2:54	DD	D	0.25
34	12-28	2:32P TO ELSINORE	CA 909 674-5412	1:27	DD	D	0.13
35	12-28	2:51P TO SACRAMENTO	CA 916 339-1915	0:30	DD	D	0.04
36	12-29	3:13P TO VAN NUYS	CA 818 997-7318	1:02	DD	D	0.09
37	12-29	3:26P TO HONOLULU	HI 808 947-5658	1:29	DD	D	0.13
38	12-29	3:41P TO HONOLULU	HI 808 947-5658	0:30	DD	D	0.04
39	12-29	3:51P TO ANCHORAGE	AK 907 522-2721	1:46	DD	D	0.16
40	12-30	9:47A TO DILLINGHAM	AK 907 842-4370	0:30	DD	D	0.04
41	12-30	9:52A TO LINDAVISTA	CA 619 571-0408	2:05	DD	D	0.19
42	12-30	9:55A TO AZEA	HI 808 487-0507	1:10	DD	D	0.11
43	12-30	10:10A TO SUTTER CRK	CA 209 267-5073	0:35	DD	D	0.05
44	12-30	10:31A TO FAIRBANKS	AK 907 451-6194	0:39	DD	D	0.06
45	12-30	10:38A TO TOGIAK	AK 907 493-5826	1:27	DD	D	0.13
46	12-30	11:31A TO SAN FRAN	CA 415 239-7504	0:37	DD	D	0.06
47	12-30	11:38A TO PEORIA	IL 309 692-7985	1:11	DD	D	0.11
48	12-30	1:51P TO LOSANGELES	CA 323 734-1593	0:37	DD	D	0.06
49	12-30	1:52P TO PROVIDENCE	RI 401 421-9475	0:30	DD	D	0.04
50	12-30	3:30P TO STOCKTON	CA 209 467-4653	0:33	DD	D	0.05
51	12-30	3:33P TO QUEENS	NY 718 723-4767	0:32	DD	D	0.05
52	12-30	3:34P TO NEW YORK	NY 212 683-5803	0:35	DD	D	0.05
53	12-30	3:38P TO SAN DIEGO	CA 619 238-2716	0:43	DD	D	0.07
54	12-30	3:39P TO SAN DIEGO	CA 619 702-6253	0:30	DD	D	0.04
55	12-31	9:54A TO SAN DIEGO	CA 619 239-5810	0:42	DD	D	0.07
56	1-04	9:06A TO QUEENS	NY 718 723-4767	0:30	DD	D	0.04
57	1-04	10:09A TO ELSINORE	CA 909 674-5412	2:20	DD	D	0.20
58	1-04	11:23A TO FAIRBANKS	AK 907 451-6194	0:30	DD	D	0.06
59	1-04	11:39A TO ANCHORAGE	AK 907 562-9006	5:07	DD	D	0.44
60	1-04	1:26P TO RENO	NV 775 673-0914	1:41	DD	D	0.15
61	1-04	1:31P TO RAINIER	OR 503 556-2575	1:07	DD	D	0.10
62	1-04	2:10P TO NEWPORTBCH	CA 949 645-2878	0:45	DD	D	0.07
63	1-04	2:11P TO BEND	OR 541 593-4023	2:04	DD	D	0.18
64	1-04	3:45P TO LOSANGELES	CA 323 734-1593	0:33	DD	D	0.05
65	1-04	3:47P TO STOCKTON	CA 209 467-4653	0:31	DD	D	0.05
66	1-05	10:30A TO ANCHORAGE	AK 907 243-0223	0:30	DD	D	0.04
67	1-05	10:31A TO ANCHORAGE	AK 907 243-7960	0:30	DD	D	0.04
68	1-05	1:19P TO SUPERIOR	WI 715 392-2648	0:31	DD	D	0.05
69	1-05	1:40P TO ANCHORAGE	AK 907 562-4485	0:32	DD	D	0.05
70	1-05	1:41P TO INDIANAPLS	IN 317 465-1056	0:37	DD	D	0.06
71	1-06	2:45P TO YORBALINDA	CA 714 692-8801	1:54	DD	D	0.17
72	1-06	2:47P TO SKEWON	ID 208 664-6059	3:58	DD	D	0.34
73	1-06	5:49P TO BEND	OR 541 488-6769	0:39	DD	E	0.05
74	1-06	5:50P TO VAN NUYS	CA 818 948-1948	0:30	DD	E	0.04
75	1-07	8:45A TO LAKEOSHEGO	OR 503 636-7884	1:09	DD	D	0.10
76	1-07	12:01P TO ANCHORAGE	AK 907 276-8252	2:02	DD	D	0.18
77	1-07	2:09P TO FAIRBANKS	AK 907 451-6194	0:30	DD	D	0.04
78	1-07	2:20P TO KODIAK	AK 907 486-5246	0:30	DD	D	0.04
79	1-07	2:25P TO KODIAK	AK 907 486-5246	5:42	DD	D	0.49
80	1-07	2:33P TO ILIAHWA	AK 907 571-1536	1:12	DD	D	0.11
81	1-07	3:30P TO LAKEOSHEGO	OR 503 636-7884	1:55	DD	D	0.17
82	1-07	3:34P TO ILIAHWA	AK 907 571-1536	1:49	DD	D	0.16
83	1-07	5:03P TO ANCHORAGE	AK 907 243-7960	0:30	DD	E	0.04
84	1-07	5:13P TO ANCHORAGE	AK 907 522-2721	1:02	DD	E	0.08
85	1-07	5:17P TO ANCHORAGE	AK 907 562-9006	0:30	DD	E	0.04
86	1-07	5:18P TO BETHEL	AK 907 543-4161	3:24	DD	E	0.27
87	1-07	5:22P TO TOGIAK	AK 907 493-5826	3:08	DD	E	0.24
88	1-07	5:28P TO ANCHORAGE	AK 907 338-2515	1:35	DD	E	0.12
89	1-07	5:31P TO ANCHORAGE	AK 907 272-1123	1:17	DD	E	0.10
90	1-07	5:33P TO ANCHORAGE	AK 907 243-0223	1:00	DD	E	0.08
91	1-07	5:43P TO MENTONE	CA 909 794-9622	0:50	DD	E	0.07
92	1-08	8:49A TO ANCHORAGE	AK 907 333-9054	1:41	DD	D	0.15
93	1-08	8:52A TO ANCHORAGE	AK 907 243-7960	1:32	DD	D	0.14
94	1-08	9:04A TO MENTONE	CA 909 794-9622	1:18	DD	D	0.12
95	1-08	9:08A TO FAIRBANKS	AK 907 451-6194	1:38	DD	D	0.15
96	1-08	9:29A TO ANCHORAGE	AK 907 562-9006	0:59	DD	D	0.09
97	1-08	9:34A TO PORTLAND	OR 503 775-9537	0:30	DD	D	0.04
98	1-08	10:10A TO SAN DIEGO	CA 619 517-8617	0:36	DD	D	0.05
99	1-08	10:12A TO ALAKANUK	AK 907 238-3576	3:27	DD	D	0.30

EXHIBIT B

This portion of the bill is optional. It is also available in other media types.
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AT&T UniPlan® Service - MEGACOM® Plus



AT&T UniPlan® SERVICE CENTER CALL - 1 800 413-5410

Call Detail

Account Number	Billed Date
171 777-5733 959	Jan 16, 1999
Subscriber Number	Account Code
146 565-7412 249	075445

DATE	TIME	FROM	TO	AREA	NUMBER	TYPE	STATUS	DURATION	RATE
Calls Billed To Line 206 178-1711 (cont'd)									
Direct Dial - Interstate (cont'd)									
1	1-08	2:48P	TO ANCHORAGE	AK	907 562-9006	0:30	DD D	0.04	
2	1-08	3:28P	TO ILLIANA	AK	907 571-1536	0:32	DD D	0.05	
3	1-08	5:57P	TO MONTONE	CA	909 794-9622	0:34	DD E	0.04	
4	1-08	6:13P	TO LOSANGELES	CA	323 734-1593	1:14	DD E	0.10	
5	1-11	10:12A	TO SAN FRAN	CA	415 239-5146	0:46	DD D	0.07	
6	1-11	10:41A	TO NEW YORK	NY	212 777-1190	2:57	DD D	0.26	
7	1-11	11:54A	TO SACHON	ID	208 756-4059	0:30	DD D	0.04	
8	1-11	11:54A	TO NORTH FORK	ID	208 865-2244	0:30	DD D	0.04	
9	1-11	11:54A	TO SALMON	ID	208 756-4059	0:30	DD D	0.04	
10	1-11	12:27P	TO NORMALK	CA	562 866-3261	7:52	DD D	0.68	
11	1-11	1:35P	TO TUCSON	AZ	520 748-2114	1:36	DD D	0.14	
12	1-11	1:40P	TO SACHON	ID	208 756-4059	0:30	DD D	0.04	
13	1-11	3:15P	TO BOISE	ID	208 322-3449	3:41	DD D	0.32	
14	1-11	3:42P	TO ANCHORAGE	AK	907 276-8252	2:06	DD D	0.19	
15	1-12	6:57A	TO ANCHORAGE	AK	907 562-9006	0:48	DD H	0.07	
16	1-12	6:59A	TO ANCHORAGE	AK	907 562-9006	0:30	DD N	0.04	
17	1-12	1:52P	TO ANCHORAGE	AK	907 562-8217	0:35	DD D	0.05	
18	1-12	2:55P	TO SOLDOTNA	AK	907 262-3761	2:16	DD D	0.19	
19	1-12	3:03P	TO ANCHORAGE	AK	907 276-8252	0:32	DD D	0.05	
20	1-12	5:02P	TO PALMER	AK	907 745-8193	2:11	DD E	0.17	
21	1-13	2:43P	TO ANCHORAGE	AK	907 243-0147	0:51	DD D	0.08	
22	1-13	2:55P	TO ANCHORAGE	AK	907 276-8252	4:07	DD D	0.35	
23	1-13	3:03P	TO ANCHORAGE	AK	907 276-8252	0:37	DD D	0.06	
24	1-15	6:43A	TO AUSTIN	TX	512 835-5050	1:24	DD N	0.11	
25	1-15	8:27A	TO AUSTIN	TX	512 835-5050	16:04	DD D	1.38	
26	1-15	8:48A	TO AUSTIN	TX	512 835-5050	0:30	DD D	0.04	
27	1-15	11:12A	TO SALEM	OR	503 390-6129	1:05	DD D	0.10	
Total for Direct Dial - Interstate								126 Calls	15.56
Direct Dial - Intrastate									
28	12-15	2:32P	TO CANAS	WA	360 834-5329	0:35	DD D	0.04	
29	12-16	3:49P	TO LONGVIEW	WA	360 501-4792	1:03	DD D	0.08	
30	12-16	4:13P	TO VANCOUVER	WA	360 693-6960	0:39	DD D	0.04	
31	12-17	4:02P	TO VANCOUVER	WA	360 693-6960	0:36	DD D	0.04	
32	12-18	3:36P	TO YAKIMA	WA	509 576-8026	2:26	DD D	0.16	
33	12-22	2:33P	TO YAKIMA	WA	509 453-5326	0:47	DD D	0.06	
34	12-28	10:05A	TO WENATCHEE	WA	509 665-8263	1:48	DD D	0.12	
35	12-30	10:41A	TO VANCOUVER	WA	360 693-6960	0:39	DD D	0.04	
36	1-08	8:12A	TO YAKIMA	WA	509 453-5326	0:30	DD D	0.04	
37	1-08	1:26P	TO YAKIMA	WA	509 453-5326	0:53	DD D	0.06	
38	1-11	1:25P	TO VANCOUVER	WA	360 694-3560	0:55	DD D	0.07	
39	1-11	1:43P	TO YAKIMA	WA	509 452-5615	0:67	DD D	0.06	
40	1-15	10:35A	TO YAKIMA	WA	509 453-5326	0:49	DD D	0.06	
Total for Direct Dial - Intrastate								13 Calls	0.87
Direct Dial - IntraLATA									
41	12-15	2:31P	TO EASTSOUND	WA	360 376-6584	0:34	DD D	0.04	
42	12-22	12:53P	TO SEATTLE	WA	206 985-6833	2:44	DD D	0.03	
43	12-22	12:59P	TO SEATTLE	WA	206 985-6833	0:30	DD D	0.01	
44	12-22	2:31P	TO ANACORTES	WA	360 588-9021	0:30	DD D	0.04	
45	12-29	11:46A	TO QUILCENE	WA	360 765-4633	1:41	DD D	0.12	
46	12-30	10:26A	TO BELLINGHAM	WA	360 647-3298	1:25	DD D	0.10	
47	12-30	10:29A	TO OLYMPIA	WA	360 754-8944	1:29	DD D	0.10	
48	12-30	11:33A	TO OLYMPIA	WA	360 357-9760	1:20	DD D	0.09	
49	12-30	3:32P	TO EASTSOUND	WA	360 376-6584	0:30	DD D	0.04	
50	1-04	3:08P	TO ANACORTES	WA	360 588-9021	0:31	DD D	0.04	
51	1-04	3:10P	TO OAK HARBOR	WA	360 679-1427	0:30	DD D	0.04	
52	1-05	1:16P	TO LK GOODWIN	WA	360 652-6689	0:32	DD D	0.04	
53	1-07	10:40A	TO SEQUIM	WA	360 681-0161	1:14	DD D	0.08	
54	1-08	9:28A	TO OLYMPIA	WA	360 754-8944	0:38	DD D	0.04	
55	1-11	3:57P	TO ANACORTES	WA	360 588-9021	1:06	DD D	0.08	
56	1-12	3:28P	TO FERDALE	WA	360 202-1555	2:06	DD D	0.15	
57	1-12	4:22P	TO PUYALLUP	WA	253 848-7973	0:53	DD D	0.06	
58	1-12	4:38P	TO OAK HARBOR	WA	360 675-1760	1:36	DD D	0.11	
59	1-13	3:41P	TO LACEY	WA	360 459-5143	0:48	DD D	0.06	
60	1-15	11:14A	TO LACEY	WA	360 459-5143	0:44	DD D	0.05	
Total for Direct Dial - IntraLATA								20 Calls	1.32
Direct Dial - International									
61	12-18	7:19A	TO DENMARK		4598450647	0:30	DD R	0.24	
62	12-18	9:01A	TO DENMARK		4598450647	0:30	DD R	0.24	
Total for Direct Dial - International								2 Calls	0.48
Direct Dial - AT&T Digital Link									
63	12-15	9:29A	TO EVERETT	WA	425 239-5416	3:51	DD D	0.03	
64	12-15	11:03A	TO EVERETT	WA	425 239-5416	1:02	DD D	0.01	
65	12-16	1:55P	TO SEATTLE	WA	206 444-8755	1:31	DD D	0.02	
66	12-16	3:52P	TO SILVERDALE	WA	360 692-8094	0:46	DD D	0.01	
67	12-17	1:14P	TO TACOMA	WA	253 584-6159	0:35	DD D	0.01	
68	12-17	3:55P	TO SEATTLE	WA	206 795-2608	5:25	DD D	0.05	
69	12-18	12:45P	TO SILVERDALE	WA	360 692-8094	4:54	DD D	0.04	
70	12-28	10:14A	TO SEATTLE	WA	206 444-8755	0:47	DD D	0.01	
71	12-28	10:15A	TO TACOMA	WA	253 471-7506	1:01	DD D	0.01	
72	12-28	10:42A	TO SEATTLE	WA	206 795-2608	2:50	DD D	0.02	
73	12-28	2:57P	TO SILVERDALE	WA	360 692-8094	1:25	DD D	0.02	
74	12-29	11:48A	TO SEATTLE	WA	206 795-2608	4:16	DD D	0.03	
75	12-29	3:24P	TO POULSBORO	WA	360 394-1764	1:17	DD D	0.02	
76	12-29	3:47P	TO TACOMA	WA	253 984-0664	1:13	DD D	0.01	
77	12-30	9:48A	TO KENT	WA	253 856-2259	0:42	DD D	0.01	
78	12-30	10:06A	TO TACOMA	WA	253 209-9578	0:30	DD D	0.01	
79	12-30	10:07A	TO TACOMA	WA	253 471-7506	1:10	DD D	0.01	
80	12-30	10:09A	TO KENT	WA	253 520-8396	0:35	DD D	0.01	
81	12-30	10:36A	TO BREHERTON	WA	360 792-8955	0:50	DD D	0.01	
82	12-30	11:25A	TO SEATTLE	WA	206 444-8755	1:38	DD D	0.02	
83	12-30	11:35A	TO TACOMA	WA	253 473-9281	1:01	DD D	0.01	
84	12-30	3:41P	TO POULSBORO	WA	360 697-5855	0:30	DD D	0.01	
85	12-30	3:44P	TO BREHERTON	WA	360 405-6011	0:30	DD D	0.01	
86	12-31	10:41A	TO SEATTLE	WA	206 795-2608	1:41	DD D	0.02	
87	12-31	12:50P	TO BREHERTON	WA	360 405-6011	0:30	DD D	0.01	
88	1-04	9:37A	TO TACOMA	WA	253 589-2484	5:56	DD D	0.05	
89	1-04	11:58A	TO BREHERTON	WA	360 405-6006	0:34	DD D	0.01	
90	1-04	11:51A	TO BREHERTON	WA	360 405-6011	0:30	DD D	0.01	

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Call Detail

AT&T UniPlan® SERVICE CENTER CALL - 1 800 413-5410

Account Number	Customer 800 Number(s)	Bill Date
171 777-5733 959	International + 1 Additional Number	Jan 16, 1999
Subscriber Number	Routing Arrangement	Type of Service
146 566-7412 248	0001	Out-of-State

Time	Start Time	Rate	Call State	Phone Number	Duration (min:sec)	Call Charge	Time	Start Time	Rate	Call State	Phone Number	Duration (min:sec)	Call Charge
800 Number Called - 800 275-2019 (cont'd)							Call Distance in Miles 293 - 430 (cont'd)						
1	12-15-98	9:08:18A	D	ID 208 336-9936	1:08	0.10	48	1-11-99	3:49:42P	D	ID 208 939-4598	1:32	0.14
2	12-15-98	9:37:09A	D	ID 208 336-8835	3:05	0.27	49	1-12-99	10:14:34A	D	ID 208 332-7088	1:07	0.10
3	12-15-98	10:09:11A	D	ID 208 338-6838	0:30	0.05	50	1-12-99	10:52:36A	D	ID 208 332-7088	1:14	0.11
4	12-15-98	12:15:35P	D	ID 208 765-8226	0:30	0.05	51	1-12-99	11:27:39A	D	ID 208 355-2260	1:24	0.13
5	12-15-98	1:02:30P	D	ID 208 888-6161	1:09	0.10	52	1-12-99	12:15:07P	D	ID 208 366-2266	5:13	0.46
6	12-15-98	1:04:06P	D	ID 208 422-9939	15:58	1.40	53	1-12-99	2:44:42P	D	ID 208 422-9939	1:51	0.17
7	12-16-98	10:04:59A	D	ID 208 664-6022	2:49	0.25	54	1-13-99	12:48:55P	D	ID 208 366-2266	1:07	0.10
8	12-16-98	10:06:06A	D	ID 208 667-7935	0:30	0.05	55	1-13-99	12:50:21P	D	ID 208 366-2266	1:12	0.11
9	12-16-98	12:55:10P	D	ID 208 658-6292	1:36	0.14	56	1-13-99	1:35:27P	D	ID 208 366-2266	8:23	0.74
10	12-16-98	1:53:51P	D	ID 208 338-6838	0:55	0.09	57	1-14-99	8:59:22A	D	ID 208 455-5043	1:33	0.14
11	12-16-98	2:32:30P	D	ID 208 765-8226	2:20	0.21	58	1-14-99	11:00:12A	D	ID 208 336-8835	1:46	0.16
12	12-16-98	4:29:49P	D	ID 208 664-6022	11:41	1.03	59	1-14-99	2:56:35P	D	ID 208 345-9574	27:52	2.45
13	12-16-98	4:39:18P	D	ID 208 338-6838	0:30	0.05	Call Distance in Miles 431 - 925						
14	12-17-98	11:42:33A	D	ID 208 888-6161	1:36	0.14	60	12-15-98	8:10:13A	D	MT 406 728-0079	0:30	0.05
15	12-17-98	3:48:31P	D	ID 208 756-6536	3:59	0.35	61	12-15-98	9:13:15A	D	MT 406 728-0079	3:23	0.31
16	12-18-98	8:32:34A	D	ID 208 455-5043	4:25	0.40	62	12-15-98	9:14:36A	D	MT 406 889-5586	2:14	0.20
17	12-18-98	12:38:33P	D	ID 208 455-5043	4:28	0.40	63	12-15-98	9:18:00A	D	MT 406 889-5586	1:13	0.11
18	12-18-98	12:44:25P	D	ID 208 455-5043	3:09	0.28	64	12-15-98	9:26:52A	D	MT 406 889-5586	2:07	0.19
19	12-18-98	4:42:54P	D	ID 208 939-4598	3:39	0.32	65	12-15-98	10:39:09A	D	NV 702N	0:50	0.08
20	12-21-98	12:07:50P	D	ID 208 884-0963	0:35	0.05	66	12-15-98	11:57:35A	D	CA 209 942-2904	0:30	0.05
21	12-22-98	1:29:35P	D	ID 208 658-6292	12:46	1.13	67	12-15-98	11:45:34A	D	CA 209 942-2904	2:16	0.20
22	12-23-98	4:01:05P	D	ID 208 884-0963	3:32	0.31	68	12-15-98	12:53:50P	D	MT 406 756-7853	1:50	0.17
23	12-28-98	8:10:56A	D	ID 208 667-7935	0:48	0.08	69	12-15-98	3:00:30P	D	MT 406 721-6933	0:58	0.09
24	12-28-98	10:12:58A	D	ID 208 658-6292	0:30	0.05	70	12-15-98	3:14:39P	D	MT 406 721-6933	1:07	0.10
25	12-28-98	10:19:55A	D	ID 208 664-6022	1:19	0.12	71	12-16-98	9:28:19A	D	CA 805 693-9944	3:36	0.32
26	12-28-98	10:22:06A	D	ID 208 658-6292	1:35	0.14	72	12-16-98	9:32:30A	D	CA 415 492-8578	24:56	2.19
27	12-29-98	11:46:54A	D	ID 208 667-9013	2:24	0.50	73	12-16-98	10:23:40A	D	CA 510 836-1001	5:23	0.48
28	12-29-98	3:42:51P	D	ID 208 746-2935	1:06	0.10	74	12-16-98	10:42:44A	D	CA 538 243-0911	1:18	0.40
29	12-30-98	10:45:00A	D	ID 208 939-4598	4:09	0.37	75	12-16-98	12:07:53P	D	WY 307 234-6332	1:10	0.11
30	12-30-98	11:37:12A	D	ID 208 664-6022	1:07	0.10	76	12-16-98	2:23:45P	D	CA 916 923-0577	6:32	0.58
31	12-30-98	1:03:18P	D	ID 208 355-2260	1:36	0.14	77	12-16-98	4:10:15P	D	CA 707 678-9852	1:40	0.15
32	1-04-99	9:43:34A	D	ID 208 367-1381	1:35	0.14	78	12-17-98	10:11:31A	D	CA 805 255-5845	4:07	0.36
33	1-04-99	10:36:57A	D	ID 208 658-6292	2:55	0.27	79	12-17-98	10:49:47A	D	CA 209 267-0245	1:23	0.13
34	1-04-99	11:35:59A	D	ID 208 667-7935	2:02	0.18	80	12-17-98	11:31:47A	D	UT 801 253-7709	1:41	0.15
35	1-04-99	2:31:01P	D	ID 208 658-6292	34:28	3.03	81	12-17-98	1:32:27P	D	CA 510 537-8569	5:05	0.45
36	1-04-99	4:37:04P	D	ID 208 422-9939	1:19	0.12	82	12-17-98	3:03:17P	D	CA 805 284-5965	0:52	0.36
37	1-05-99	2:10:06P	D	ID 208 345-2694	1:23	0.13	83	12-18-98	2:11:00P	D	CA 805 284-5966	6:27	0.85
38	1-05-99	2:38:24P	D	ID 208 366-2266	1:12	0.11	84	12-18-98	3:08:31P	D	UT 801 253-7709	0:37	0.06
39	1-05-99	10:58:10A	D	ID 208 756-6536	2:09	0.19	85	12-18-98	3:09:21P	D	UT 801 253-7709	1:15	0.12
40	1-08-99	1:29:52P	D	ID 208 422-9939	0:50	0.05	86	12-18-98	3:44:52P	D	UT 801 253-7709	0:30	0.05
41	1-08-99	3:05:43P	D	ID 208 422-9939	0:55	0.09	87	12-18-98	3:56:51P	D	UT 801 253-7709	0:36	0.05
42	1-08-99	3:44:32P	D	ID 208 422-9939	0:30	0.05	88	12-18-98	4:14:38P	D	UT 801 253-7709	1:22	0.13
43	1-11-99	8:17:59A	D	ID 208 756-6536	1:16	0.12	89	12-21-98	8:45:18A	D	NV 775 783-9795	3:55	0.35
44	1-11-99	8:17:59A	D	ID 208 422-9939	0:30	0.05	90	12-21-98	11:06:16A	D	NV 702 871-8691	2:34	0.23
45	1-11-99	8:50:14A	D	ID 208 422-9939	0:39	0.06							

DM - Starting in Day Rate Period, spanning Rate Period
 EM - Starting in Evening Rate Period, spanning Rate Period
 NM - Starting in Night Rate Period, spanning Rate Period
 Call Charges reduced by applicable recurring monthly discount plans
 Call charged from a payphone
 Number Not Available
 Call Routed Via Alternate Number Translation
 Call Routed Via ADK Party
 Call Routed Via ADK Party
 Call Routed Via ADK Party
 Call Completed Via USADirect

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EXHIBIT - C