

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

COX COMMUNICATIONS, INC.  
Petitioner

v.

AT&T INTELLECTUAL PROPERTY I, L.P.  
Patent Owner

---

Case IPR2015-01227  
Patent 7,907,714

Title: PROFILE MANAGEMENT SYSTEM INCLUDING USER INTERFACE  
FOR ACCESSING AND MAINTAINING PROFILE DATA OF USER  
SUBSCRIBED TELEPHONY SERVICES

---

DECLARATION OF MICHELLE WATSON-WILLIAMS

I, Michelle Watson-Williams, declare as follows:

1. I have been asked by Patent Owner AT&T Intellectual Property I, L.P., to provide this Declaration regarding U.S. Patent No. 7,907,714.

**I. Background**

2. My name is Michelle Watson-Williams. I am currently Senior Quality Assurance Product Manager for AT&T Services, Inc. in the Technology Development department. I make this declaration from my personal knowledge, and if called to testify to the contents of it, could and would do so competently.

3. I am a salaried AT&T Services employee. My compensation does not depend in any way on the outcome of this proceeding. I have not been offered any payment, incentive, or inducement to provide this declaration.

4. In preparing this Declaration, I reviewed U.S. Patent No. 7,907,714 and a document entitled Requirements Document PC User Interface dated July 17, 1996, which I understand is submitted as Exhibit 2044.

5. I have worked at AT&T Services or its predecessor companies since 1984. I began my career at Southwestern Bell Telephone Company in St. Louis, Missouri in 1984. From 1984 through 1988, I was a Manager of Forecasting in Marketing and Sales. In that role, among other tasks, I was responsible for preparing and maintaining forecasting models for end user common line demand and revenues.

6. From 1988 through 1989, while still at Southwestern Bell Telephone Company, I was Area Manager for Forecasting Computer and Data Support in Marketing and Sales. In that role, my responsibilities included providing planning and analysis of expense budget information for the district and supervising the maintenance of the department's training budget database.

7. From 1989 through 1995, while still at Southwestern Bell Telephone Company, I was Area Manager for Marketing Information Systems in Marketing and Sales. In that role, my responsibilities included managing the Revenue Accounting Process in marketing, and participating in interdepartmental teams associated with revenue conversions and enhancements.

8. From 1995 through 1997, while still at Southwestern Bell Telephone Company, I was Marketing Manager and an Associate Director for Product Management in Consumer and Marketing divisions. In that role, my responsibilities included product management for a new Advanced Intelligent Network security service called Positive ID, which was targeted to medium-to-large businesses. I also managed the associated PC-interface application which allowed Positive ID customers to interact directly with Southwestern Bell Telephone.

9. Since 1997, I continued to be employed by Southwestern Bell Telephone Company, which was then rebranded as SBC Communications. SBC

Communications later purchased AT&T, at which point I became an employee of AT&T.

## **II. Positive ID**

10. Exhibit 2044 is a Requirements Document for the PC User Interface of the Positive ID service. I understand that the document was maintained in the records of the patent department at AT&T. I was and am familiar with this document based on my experience as a contributing author and approver for the document. Requirements documents prepared during my tenure at Southwestern Bell Telephone Company, like Exhibit 2044, were intended as handoff documents prepared at the completion of a product, after the product was fully tested and after verification that the product achieved its intended goals. Such documents were prepared with the intention that, once a product manager departs, a later reader of the requirements document can understand the operation of the subject product, what resources are needed for its operation, and what processes were involved in developing the product, all from the requirements document. I collaborated on the Requirements Document of Exhibit 2044 with Kristin Chambers, who is named on the front page of the document. The date reflected on the first page, July 17, 1996, is accurate and consistent with my experience and knowledge of the development and deployment of the Positive ID service. Further, the contents of the document

are accurate and describe the operation of the Positive ID service as it existed in July 1996.

11. As part of the roll-out of the Positive ID service, subscribers were provided with software to install on their business' computers to manage the subscriber's profile using the Positive ID service. Ex. 2044, p. 12. The Positive ID service provided a subscriber with the ability to manage the calling telephone numbers that were allowed access to the subscriber's telephone numbers. For example, a business could restrict incoming connections to a modem connected to a phone line to a defined list of calling parties.

12. Once the software was installed, a subscriber could use the software to view their subscriber profile data from a computer executing the software. The subscriber profile data was obtained by the Positive ID servers from the telephony network systems upon the subscriber's request, sent to the subscriber's computer executing the software, and then presented by a graphical user interface window displayed on the subscriber's computer screen.

13. The subscriber could then enter in additional numbers to be granted access, and a corresponding update would be sent using the software to the Positive ID servers. The Positive ID servers would then store that update on the telephony network systems, which would then control access to the subscriber's telephone numbers in accordance with the subscriber's updated profile.

14. As I stated above, the Positive ID service as described was operational as of July 17, 1996, as supported by the document and my personal knowledge. In addition, other documentation supports the availability of this service as early as July 17, 1996. For example, I understand that the Petitioner in this proceeding submitted a press release dated April 5, 1996 as part of Exhibit 1011. That press release refers to the introduction of Positive ID as described above. The press release includes multiple quotations from me explaining the benefits of authorization systems like Positive ID. The press release concludes with a telephone number provided to customers to learn more information about Positive ID, indicating that the product was available at the time, and at least as early as July 17, 1996. At the time, the 800 number connected callers to representatives who would explain the Positive ID service to potential subscribers, and who could order the software to be shipped to the subscribers.


### **III. Conclusion**

15. In signing this declaration, I recognize that the declaration will be filed as evidence in a contested case before the Patent Trial and Appeal Board of the United States Patent and Trademark Office. I also recognize that I may be subject to cross examination in the case and that cross examination will take place within the United States. If cross examination is required of me, I will appear for

cross examination within the United States during the time allotted for cross examination.

16. I declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Executed on this 4 day of April, 2016.

  
Michelle Watson-Williams  
Plano, Texas