BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Revocation of Telecommunications Registration of

SIMPLY CELLULAR & TELEPHONE, LLC

for Failure to Pay Penalty Assessment Fees.

DOCKET NO. UT-020620

MOTION FOR ENTRY OF ORDER REVOKING REGISTRATION

Commission Staff requests the Commission enter an order revoking Simply Cellular & Telephone, LLC's (Simply Cellular or Company) registration as a telecommunications company pursuant to WAC 480-121-060.

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On June 11, 2003, the Commission served on Simply Cellular a Notice of Impending Revocation of Registration as a Telecommunications Company and Opportunity to Request a Hearing (Notice). *See* Declaration of Lisa Lloyd. The Notice informed Simply Cellular that the Commission would revoke its registration as a telecommunications company for failure to respond to a penalty assessment, failure to file an annual report, and failure to pay regulatory fees. The Notice further informed Simply Cellular that it could request a hearing to show why its registration should not be revoked. The Notice required Simply Cellular to file a request for hearing within 30 days of the Notice. Failure to do so would result in the Commission entering an order revoking the Company's registration without further notice.

Simply Cellular failed to request a hearing within 30 days of the Notice.

Thus, Staff requests the Commission enter an order revoking the Company's

registration without further notice.

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DATED this _____ day of August 2003.

CHRISTINE O. GREGOIRE Attorney General

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