

I T L
INTERNATIONAL TELCOM LTD.
417 SECOND AVENUE WEST SEATTLE, WASHINGTON 98119 USA

6/16/2015

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
PO Box 47250
Olympia, WA 98504-7250

RE: 2014 Telecommunications Companies Annual Report
Penalty Assessment UT-150825

Dear Washington Utilities and Transportation Commission,

I recently submitted an "Application for Mitigation" for the Penalty assessed my company for the 2014 Annual Report.

I inadvertently omitted the most important piece of evidence that further shows my intention and effort: the USPS Priority Mail receipt dated 4/30/15 that stated that my document would be delivered on 5/1/2015, which would have made the Annual Report timely.

I have enclosed this receipt, as well as a copy of the Application for Mitigation that I have already submitted. Please add this receipt into consideration of my request.

Thank you for your time and please contact me with any questions.

Sincerely,



Leslie Beach, Tax & Regulatory Compliance
International Telcom Ltd.
417 2nd Avenue West
Seattle, WA 98119
(206) 479-2260
(206) 600-7803 FAX
Leslieb@itltd.net

2015 JUN 17 PM 1:57
STATE OF WASHINGTON
UTILITY AND TRANSPORTATION COMMISSION

Leslie Beach

From: USPS_Shipping_Services@usps.com
Sent: Thursday, April 30, 2015 12:17 PM
To: Leslie Beach
Subject: USPS - Click-N-Ship(R) Payment Confirmation



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USPS-Click-N-Ship® Payment Confirmation

Thanks for shipping with us, MIKE TYLER!

Additional information regarding your label(s) can be found in your [Shipping History](#). From your Shipping History you can Ship Again, track your package, or request a refund.

Click-N-Ship® Payment Details

Acct #: 47920344
Transaction Number: 334280458
Transaction Date/Time: 04/30/2015 02:11 PM CDT
Transaction Amount: \$5.05
Payment Method: VISA-2345

Priority Mail® 1-Day

Flat Rate Envelope
9405 9036 9930 0409 8443 70 (Sequence Number 1 of 1)

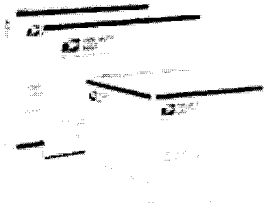
Scheduled Delivery Date: 05/01/2015

Shipped to: TELECOMMUNICATIONS ANNUAL
REPORT
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION
PO BOX 47250
OLYMPIA WA 98504-7250

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WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

PENALTY ASSESSMENT UT-150825

PLEASE NOTE: You must complete and sign this document, and send it to the Commission within 15 days after you receive the penalty assessment. Use additional paper if needed.

I have read and understand RCW 9A.72.020 (printed below), which states that making false statements under oath is a class B felony. I am over the age of 18, am competent to testify to the matters set forth below and I have personal knowledge of those matters. I hereby make, under oath, the following statements.

1. **Payment of penalty.** I admit that the violations occurred. I have:

Enclosed \$ _____ in payment of the penalty

Submitted my payment of \$ _____ online at www.utc.wa.gov.
My confirmation number is _____.

2. **Request for a hearing.** I believe that one or more of the alleged violations did not occur, for the reasons I describe below, and I request a hearing based on those reasons for a decision by an administrative law judge:

3. **Application for mitigation.** I admit the violations, but I believe that the penalty should be reduced for the reasons set out below:

please see attached letter.

a) I ask for a hearing to present evidence on the information I provide above to an administrative law judge for a decision

OR b) I ask for a Commission decision based solely on the information I provide above.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing, including information I have presented on any attachments, is true and correct.

Dated: June 5, 2015 [month/day/year], at Seattle, WA [city, state]

Leslie Beach
Name of Respondent (company) – please print


Signature of Applicant

RCW 9A.72.020:

“Perjury in the first degree. (1) A person is guilty of perjury in the first degree if in any official proceeding he makes a materially false statement which he knows to be false under an oath required or authorized by law. (2) Knowledge of the materiality of the statement is not an element of this crime, and the actor’s mistaken belief that his statement was not material is not a defense to a prosecution under this section. (3) Perjury in the first degree is a class B felony.”

I T L
INTERNATIONAL TELCOM LTD.
417 SECOND AVENUE WEST SEATTLE, WASHINGTON 98119 USA

June 5, 2015

Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

RE: Penalty Assessment UT-150825

Dear Commission,

In regard to the penalty assessed to our company for our 2014 Annual Report, I am respectfully requesting a waiver or reduction of the penalty assessed.

I was under the assumption that a postmark would suffice, I mailed this report on April 30th, 2015.

There was no willful negligence intended. We have business in all 50 states and I deal with each State's agencies that all have reports due around the same time of year. I do all of my work in order of due dates. Most everything I file is based off Post Mark due dates with the exception of very few items.

I have remedied the possibility of this happening again by moving this particular report up to an earlier date of my list of tasks. This will not happen again.

I would also like the Commission to please note that my company has a record of timely filing and I hope this will be taken into account on my request to waive this penalty and grant us this one-time courtesy.

Thank you for your time and consideration of my request.

Sincerely,



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UTILITY AND TRANSPORTATION
COMMISSION
OLYMPIA, WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

NOTICE OF PENALTIES INCURRED AND DUE
FOR VIOLATIONS OF LAWS AND RULES

SERVICE DATE

JUN - 3 2015

PENALTY ASSESSMENT: UT-150825
PENALTY AMOUNT: \$300

INTERNATIONAL TELCOM, LTD.
417 2ND AVENUE WEST
SEATTLE, WA 98119

According to Washington Utilities and Transportation Commission (Commission) records, you have violated Washington Administrative Code (WAC) 480-120-382, which requires telecommunications companies to file your annual report and pay regulatory fees each year by May 1. You did not file an annual report or pay regulatory fees by May 1, 2015.

Revised Code of Washington (RCW) 80.04.080 authorizes the Commission to assess a penalty of \$100 for each violation of a Commission rule. In the case of a continuing violation, every day's continuance is a separate and distinct violation. The Commission interprets noncompliance with WAC 480-120-382 beyond May 1 as a continuing violation, and assesses penalties of \$100 for each day a company fails to file its report or pay its regulatory fees after that date.

As a result, the Commission has assessed penalties against you in the amount of \$300 on the following basis:

On February 27, 2015, the Commission mailed the 2014 annual report forms and the 2015 regulatory fee packets to all telecommunications companies registered in Washington. The instructions page for the annual report form instructed these companies to file annual reports and pay regulatory fees by May 1, 2015. The instructions page also stated that failure to file the annual report by May 1 would result in penalties. The deadline for requesting an extension to file your annual report was April 15. You did not request an extension.

On May 6, 2015, International Telcom, Ltd. filed its 2014 annual report and paid its 2015 regulatory fee. May 6 is 3 business days from May 1, resulting in a total penalty of \$300.

Your penalty is due and payable now. If you believe the violation did not occur, you may request a hearing to contest the penalty assessment. The Commission will grant that request only if material issues of law or fact require consideration of evidence and resolution in a hearing. A request for a hearing must include a written statement of the reasons supporting that request. Failure to provide such a statement will result in denial of the request.