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September 29, 2022

**VIA E-FILING**

Ms. Amanda Maxwell, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

Re: U-220271-Comments of the Washington Independent Telecommunication  
Association

Dear Ms. Maxwell:

The Commission has issued a Notice of Opportunity to File Written Comments on Proposed Rules dated August 22, 2022, along with proposed rules and a CR 102 Notice. The purpose of the rulemaking docket is to incorporate amendments to RCW 80.24.010 into the Commission's rules on regulatory fees. The statutory change to RCW 80.24.010 increased the maximum regulatory fee that can be assessed. Below are the comments of the Washington Independent Telecommunications Association ("WITA").

WITA has no objection to amendment of WAC 480-120-385(4) to comport with the statutory change. However, WITA does object to any actual increase in the regulatory fees paid by WITA members.

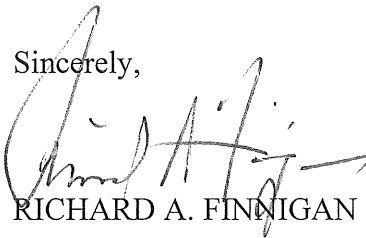
WITA's members are classified as Class B telecommunications companies. WAC 480-120-034. Over the past several years, the regulatory activities for the Commission related to Class B telecommunications companies has remained relatively stable. In addition, the primary workload on the Commission for Class B companies is to implement the Washington Universal Communications Services Program. For these activities, the Commission is entitled to be reimbursed its costs of overseeing the Program out of the funds appropriated for the Washington Universal Communications Services Program. The Commission has done so in recent years. As a result, there is a substantial amount of money that the Commission uses for its regulatory activities that are taken directly from appropriations that would otherwise be used for the advancement of the activities under the Washington Universal Communications Services Program.

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To this end, WITA respectfully requests that the Commission exercise the authority it possesses under WAC 480-120-385(4)(b) to issue an order each year that sets the regulatory fees for Class B telecommunications companies at the same level that exists today. This comports with the Legislative intent expressed in RCW 80.24.020 that the regulatory fees should approximate the cost of regulation.

Thank you for your attention to WITA's concerns.

Sincerely,  
  
RICHARD A. FINNIGAN

RAF/cs

cc: Client (via e-mail)