

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

COSPEED, LLC, CVC CLEC, LLC, GO
SOLO TECHNOLOGIES, INC.,
GRASSHOPPER GROUP, LLC, NET
TALK.COM, INC., NOWYR, INC.,
PELZER COMMUNICATIONS
CORPORATION, PRICERIGHT
COMMUNICATIONS, LLC, PUGET
SOUND TELECOMMUNICATIONS, LLC
d/b/a PUGET SOUND TELECOM LLC,
TELEFONICA USA, INC., TELMEX USA,
L.L.C., VANCO US, LLC, VERTEX
TELECOM, INC.,

Respondents.

DOCKET UT-121721

COMMISSION STAFF'S
RESPONSE TO TELEFONICA'S
LETTER OF MARCH 7, 2013

1 On February 4, 2012, the Washington Utilities and Transportation Commission (Commission) held a hearing to determine whether to revoke the registrations of Telefonica USA, Inc. (Telefonica) and other telecommunications companies for failure to file annual reports or pay regulatory fees. At the hearing, Commission Staff (Staff) provided evidence that Telefonica had neither filed its 2011 annual report nor paid regulatory fees for 2012.

Staff recommended that the Commission revoke Telefonica's registration.

2 Since the hearing, Telefonica has come into compliance. On March 7, 2013,


Telefonica filed a letter in this docket notifying the Commission that it had filed its 2011 annual report and paid its 2012 regulatory fees. Staff views Telefonica's letter as a motion to reopen the record under WAC 480-07-830, and files this response in support of reopening the record to receive evidence of Telefonica's compliance with annual report and regulatory fee submission requirements.

3. Accordingly Staff offers for admission into evidence the Declaration of Mathew Perkinson, which accompanies this response filing. Mr. Perkinson has attached a copy of Telefonica's 2011 annual report and documentation of payment of regulatory fees and penalties to his declaration. In his declaration, Mr. Perkinson provides background information concerning this proceeding and Staff's revised recommendation regarding Telefonica.

DATED this 21st day of March 2013.

Respectfully submitted,

ROBERT W. FERGUSON
Attorney General


JENNIFER CAMERON-RULKOWSKI
Assistant Attorney General
Counsel for Washington Utilities and
Transportation Commission Staff