



June 21, 2016

Mr. Gregory J. Kopta
Washington Utilities and Transportation Commission
PO Box 47250
Olympia WA 98504-7250

2016 JUN 22 AM 10:13
STATE OF WASHINGTON
UTILITY AND TRANSPORTATION
COMMISSION
RECEIVED
MANAGEMENT

Washington Utilities and Transportation Commission:

This note and the attached are for consideration that the penalty assessed Operator Service Company, LLC.

The regulatory filings for Operator Service Company, LLC have been recently insourced from our agent: Telecom Professionals Inc. As I have assumed the responsibilities, I am responsible for filing the Washington Telecommunications CLEC Annual Report.

I do acknowledge that I did not submit the Telecommunications Companies CLEC 2015 Annual Report until May 5, 2016. Attached for consideration to reduce or eliminate the penalty I am submitting two documents:

1. Email confirmation that Operator Service Company, LLC submission was received by the Washington Utilities and Transportation Commission on May 5, 2016.
Documents filed:
 - a. WA Telecommunications CLEC Annual Report Form 2015
 - b. Electronic Tariff Filing program authority
2. Letter sent May 5, 2016 to Steven King via the Electronic filing system requesting to participate in the Electronic Tariff filing program.
 - I erroneously thought Operator Service Company required authorization in order to pay our \$153 tariff:
 - \$150 for regulatory fees
 - \$3 for Penalties and Interest
3. Corrected copy was resubmitted via email on June 7, 2016, adding:
 - a. Washington Unified Business Identifier (UBI) on page 3
 - i. Also needed to make our \$153 payment (unfortunately not communicated to Operator Service Company by our Agent). Immediately made payment upon receipt of UBI.
 - b. \$112 to Line 1

I would greatly appreciate your consideration of this documentation to eliminate or reduce the \$1,000 penalty assessed to Operator Service Company.

Additionally, if you could please update your records for Operator Service Company, LLC's mailing address:

6010 Exchange Parkway
San Antonio, TX 78238
Attn: Jennifer Hinojosa

Another reason why we insourced our regulatory filings, our information was not being updated by our agent in a timely fashion and hence we have not been receiving important communications in a timely manner.

Sincerely,



Name: Lisa F. Bencel
Title: Global Controller and Treasurer
610.997.1077
Lisa.Bencel@kgb.com

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

PENALTY ASSESSMENT UT-160578

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:

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: 06-21-16 [month/day/year], at BETHLEHEM, PA [city, state]

OPERATOR SERVICE COMPANY, LLC
Name of Respondent (company) – please print

Jose F. [Signature]
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.”

Lisa Bencel

From: Records Service Center <Sharepointadmins@utc.wa.gov>
Sent: Thursday, May 05, 2016 2:49 PM
To: Lisa Bencel
Subject: UTC E-Filing submission received, confirmation ID 4139

Your e-file submission has been received by the Washington Utilities and Transportation Commission. Please save this e-mail, and use the confirmation ID when contacting the Commission.

* Please do not reply to this message. This is an automated message, and the originating account cannot receive e-mails.

E-File submission details:

E-File ID: 4139
Docket No:
Company: Operator Service Company, LLC
Filing description: Operator Service Company, LLC (OSC) Telecommunications Companies 2015 Annual Report with Redacted Financial Statements.

Documents filed:

Filename: WA Telecommunications CLEC Annual Report Form 2015.xlsx
Description: OSC Annual Report with Redacted Financial Statements
Confidentiality: Highly confidential

Documents filed:

Filename: WA Electronic Tariff Filing Program .pdf
Description: Electronic Tariff Filing Program
Confidentiality: Highly confidential

①



May 5, 2016

Steven King, Executive Director and Secretary
Washington Utilities and Transportation Commission
Attn: Records Center
PO Box 47250
Olympia WA 98504-7250

Dear Mr. King:

Thank you for allowing Operator Service Company, LLC, to participate in the Electronic Tariff filing program.

The individuals who are authorized to submit e-filings are:

Name: Lisa F. Bencel
Telephone: 610.997.1077
Fax: 610.997.1050
Email address: Lisa.Bencel@kgb.com

Name: Jennifer Hinojosa
Telephone: 210.767.7041
Fax:
Email address: Jennifer.Hinojosa@kgb.com

Name: Mira Jackson
Telephone: 212.418.8262
Fax:
Email address: Mira.Jackson@kgb.com

Sincerely,

A handwritten signature in cursive script that reads "Lisa F. Bencel".

Name: Lisa F. Bencel
Title: Global Controller and Treasurer

Lisa Bencel

From: Lisa Bencel
Sent: Tuesday, June 07, 2016 2:35 PM
To: 'sbennett@utc.wa.gov'
Cc: Jennifer Hinojosa
Subject: Washington Telecommunications Companies 2015 Annual Report
Attachments: Official Payments - Pay Taxes, Utility Bills, Tuition & More Online_worker05.mht; WA 2015 Annual Report.pdf; WA Telecommunications CLEC Annual Report Form 2015.xlsx

Hi Sean:

Attached for your records is the updated 2015 Annual Report for Operator Service Company, LLC(OSC) in both the excel format and pdf format. Per WAC 480-07-160 we elect to file OSC's annual report as confidential. The file is marked as such.

Also attached is OSC's payment confirmation. Thank you for your assistance in getting this completed correctly. Please let me know if you have any other questions.

Regards,

Lisa

Lisa F. Bencel
kgb
Global Controller
Office: 610.997.1077

This message is intended only for the use of the person whom it is addressed and may contain information that is confidential and privileged under applicable laws. If you are not the intended recipient, you are hereby notified that any use, review, disclosure or copying of this message and information it contains is prohibited. If you have received this message in error, please notify the sender by reply e-mail and discard all its contents.

3