**BEFORE THE WASHINGTON**

**UTILITIES AND TRANSPORTATION COMMISSION**

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| WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,  Complainant,  v.  ethos communications Group, inc., go solo technologies, inc., ibfa acquisition company, llc, inmate communicAtions corporation, net talk.com, inc., pac-west telecomm, inc., tcast communications, inc., telecare, inc.,  Respondents.  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | )  )  )  )  )  )  )  )  )  )  )  )  )  )  )  )  ) | DOCKET UT-143237  DECLARATION OF  AMY ANDREWS |

Amy Andrews, under penalty of perjury under the laws of the State of Washington, declares as follows:

1. I am employed by the Washington Utilities and Transportation Commission (Commission) as a Regulatory Analyst in the Financial Services Section. As a Regulatory Analyst, my responsibilities include conducting compliance investigations of regulated utility and transportation companies. As part of those duties, I investigate telecommunications companies that have failed to timely submit required filings or payments.
2. Regulated telecommunications companies must submit annual reports and file regulatory fees by May 1 of each year. Each year, the Commission distributes an annual report form and a regulatory fee schedule to facilitate these submissions.
3. On February 28, 2014, the Commission mailed an annual report form to each registered telecommunications company at the address on file with the Commission. The annual report form includes a regulatory fee calculation schedule and requires a company to attach other documents as well. A completed annual report form, with the necessary attachments, constitutes a company’s annual report.
4. The annual report form now also includes an instructions page, titled “Instructions for Annual Report Completion,” which explains the annual report and regulatory fee submission requirements. The instructions direct the regulated company to return the completed form and pay any regulatory fees by May 1, 2014. The instructions further state that, if the company fails to file a completed annual report and pay regulatory fees by May 1, 2014, the Commission will assess a financial penalty of $100 for each business day after May 1 that the report was not filed or the regulatory fees remained unpaid. Those companies wishing to request an extension to file the annual report are instructed to do so before April 17, 2014, and to provide a reason for the extension. A copy of the instructions page is attached as Attachment A.
5. In late May and in June, 2014, the Commission assessed penalties under RCW 80.04.405 against all telecommunications companies that had failed to timely file an annual report and pay regulatory fees. The penalty assessment was mailed to each company at its address on file with the Commission. The penalty assessment also notified the company that the Commission could initiate proceedings under WAC 480-121-060 to revoke the company’s authority to provide telecommunications services in Washington.
6. On August 20, 2014, I emailed a notification of the pending revocation proceeding to each respondent company at its email address on file with the Commission. In addition, I attempted to telephone each respondent company at the telephone number on file with the Commission. My emails to Ethos, Net Talk, and Tcast appeared to go through, and I was able to leave voicemail messages for Go Solo, IBFA, Inmate Communications, and Telecare. My email to Pac-West was returned for reason of a bad address, and the company’s telephone system did not accept my call.
7. In preparation for the annual revocation proceeding, I generated a list from the Commission’s Annual Report Tracking System (ARTS) of telecommunications companies registered with the Commission that still had not filed an annual report or paid regulatory fees. As of September 2, 2014, the Commission had received neither the 2013 annual report nor the 2014 regulatory fees from the eight telecommunications companies in the attached draft complaint.

DATED this 17th day of September, 2014, at Olympia, Washington.

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AMY ANDREWS

**Attachment A**

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