



STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • TTY (360) 586-8203

June 17, 2015

Steven V. King, Executive Director and Secretary
Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P.O. Box 47250
Olympia, WA 98504-7250

RE: *Washington Utilities and Transportation Commission v. International Telcom, Ltd.*

Commission Staff's Response to Application for Mitigation of Penalties UT-150825

Dear Mr. King:

On June 3, 2015, the Utilities and Transportation Commission issued a \$300 Penalty Assessment in Docket UT-150825 against International Telcom, Ltd. for 3 violations of Washington Administrative Code (WAC 480-120-382), which requires telecommunications companies to furnish annual reports to the commission no later than May 1 each year.

On June 8, 2015, International Telcom, Ltd. wrote the commission requesting mitigation of penalties. In its mitigation request, International Telcom, Ltd. does not dispute the violation occurred. The company states, "I was under the assumption that a postmark would suffice, I mailed this report on April 30th, 2015". The statement continues, "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".

It is the company's responsibility to ensure that the regulatory fee is paid and the annual report is filed by the May 1 deadline. On February 27, 2015, Annual Report packets were mailed to all regulated telecommunications companies. The instructions for annual report completion page of the annual report informed the regulated company that it must complete the annual report form, pay the regulatory fees, and return the materials by May 1, 2015, to avoid enforcement action.

As of May 5, 2015, International Telcom, Ltd. filed an incomplete 2014 annual report and paid the regulatory fees owed. On May 6, 2015, the company submitted a revised and complete 2014 annual report. The company has been active since 1995. International Telcom, Ltd. previously missed the deadline to file its annual report and pay regulatory fees during the 2000 and 2003 reporting years. Staff supports the company's request for mitigation due to the recent company

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history of filing compliance. Staff recommends a reduced penalty of \$50 per day for a total penalty assessment of \$150

If you have any questions regarding this recommendation, please contact Amy Andrews, Regulatory Analyst, at (360) 664-1157, or aandrews@utc.wa.gov.

Sincerely,



Sondra Walsh, Director
Administrative Services