

Received & Inspected

SEP 11 2013

FCC Mail Room

GRAHAM
& DUNN_{PC}

September 10, 2013

JUDITH A. ENDEJAN
(206) 340-9694
jendejan@grahamdunn.com

WC: 06-122

VIA FEDERAL EXPRESS

Ms. Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
9300 E. Hampton Drive
Capitol Heights, Maryland 20743

Re: In the Matter of Request of Intelafone for Review of Decision of Universal Service Administrative Company

Dear Ms. Dortch:

Pursuant to 47 CFR §54.721, Intelafone LLC (Intelafone) requests review of the attached invoice from the Universal Service Administrative Company (USAC) assessing \$3,625.00 in penalties for Intelafone's failure to file FCC Form 499-A in 2011 and 2012¹.

I. STATEMENT OF INTEREST

Intelafone, a Washington limited liability company, respectfully requests the Commission to review and reverse the decision of the Universal Service Administrative Company ("USAC") assessing Intelafone \$4,200 in penalties for failing to file a FCC Form 499-A for 2011 and 2012.

¹ This is the second invoice Intelafone received and is the current, outstanding invoice. Intelafone received the first invoice assessing the \$4,200 in penalties in July but did not keep a copy of it. Intelafone claims the full \$4,200 charge is in error and requests return of the \$575 it paid for the first invoice.

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II. STATEMENT OF FACTS

The Declaration of Ryan Tilton filed herewith supports the following facts. Intelafone offers interconnected VoIP services in Washington State. Intelafone was started by Ryan Tilton, who has a background in telephony. He developed the Intelafone service as a hobby and sold it to “family members and friends” in 2010 and 2011. Mr. Tilton decided to turn Intelafone into an actual startup operation in late 2012. Prior to that time it had no positive cash flow. As Exhibits A through C to Mr. Tilton’s Declaration disclose Intelafone operated at a loss in 2010 and 2011 and produced a very small net income in 2012. Mr. Tilton did not think that he needed to file an FCC Form 499-A for his 2010 and 2011 non-commercial operations. Mr. Tilton did not obtain an FCC registration number for his commercial operations until March 31, 2013.

Mr. Tilton first learned of a Form 499-A filing requirement after obtaining Intelafone’s FCC number. On May 30, 2013 Mr. Tilton submitted the Form 499-A reporting Intelafone’s 2012 revenues. Mr. Tilton was uncertain if he should have filed a Form 499-A reporting 2010 and 2011 revenues because Intelafone was not offering services to the public and revenues were not positive. However, Mr. Tilton decided to file the Form 499-A for 2010 and 2011 out of an abundance of caution at the same time he filed the 2012 form.

Intelafone was not required to make any universal services contribution for any year because it had *de minimis* revenues. In July 2013, Mr. Tilton received an invoice from USAC with charges totaling \$4,200. Mr. Tilton contacted USAC and was advised that this amount was due to “late filing sanctions” that assessed Intelafone \$100 per month for failure to file the 2010 and 2011 Form 499-A. Mr. Tilton contacted USAC over this charge and was told that USAC would not waive these late filing fees. The USAC invoice did not assess any actual USF contribution amount – only late filing fees. The only dispute at issue is the assessment of \$4,200 in late filing fees.

III. QUESTION PRESENTED

- A. Did USAC have the authority to assess a \$4,200 fee pursuant to 47 CFR § 54.713(c)?
- B. Even if the USAC Administrator properly assessed a \$4,200 late filing fee, should this fee be waived in the interest of justice and equity?

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IV. RELIEF SOUGHT/ANALYSIS

Intelafone's first invoice from USAC charged no actual delinquent USF contributions. This invoice only assessed a \$4,200 penalty in the form of late filing fees for Intelafone's failure to file a Form 499-A for the first two years of its existence, when it was not yet even a commercial provider of VoIP services. This penalty should be set aside for several reasons. First, the Commission's rules do not allow for an assessment of a late filing fee on a per-month basis. Second, the assessment of the late filing fee is grossly disproportionate to any amounts that might have been assessed based upon Intelafone's 2010 and 2011 revenues. Third, the failure to file was an unintentional, inadvertent error by Mr. Tilton, Intelafone's President and CEO. Fourth, the Commission can, and should, grant the relief requested pursuant to 47 CFR § 1.3.

1. *The Administrator lacked the authority to assess a \$100 fee per month.*

47 CFR §54.713(c) states: the Commission's rule on penalties for failure to file a Form 499-A allow:

"If a universal service fund contributor is more than 30 days delinquent in filing a Telecommunications Reporting Worksheet Form 499-A or 499-Q, the Administrator shall assess an administrative remedial collection charge equal to the greater of \$100 or an amount computed using the rate of the US prime rate (in effect on the date the applicable Worksheet is due) plus 3.5 per cent, of the amount due per the Administrator's calculations. In addition, the contributor is responsible for administrative charges of collection and/or penalties and charges permitted by the applicable law (e.g. 31 U.S.C. §3717 and implementing regulations). . . ."

There was no amount due from Intelafone for failure to pay any USF charges. Yet the Administrator assessed a \$100 per month late filing fee. There is no authority for such a per-month calculation under 47 CFR §54.713, which allows only for an administrative remedial collection charge equal to the "greater of \$100." Nothing in this rule compounds that charge on a monthly basis. Further, nothing in 31 U.S.C. § 3717 authorizes a \$100 per-month penalty. Thus, the Administrator lacked authority to invoice Intelafone for \$4,200.

2. *Intelafone's failure to file Form 499-A was unintentional and inadvertent.*

Mr. Tilton's declaration establishes that he did not know he needed to file a Form 499-A for 2010 and 2011 because his company was in its very infancy and its service was not offered to the general public. Intelafone did not operate as a common carrier offering its services to the general public until 2012. Intelafone had no net income for 2010 and 2011 as the company's balance

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sheets demonstrate. Nonetheless, because Mr. Tilton was unsure as to whether he needed to file Form 499-A for 2010 and 2011, he elected to err on the side of full disclosure of his activities, which did not even qualify him as a reporting contributor. Indeed, Intelafone was not even an operating entity until 2012. The foregoing factors demonstrate no deliberate avoidance of a regulatory obligation or disregard of this Commission's rules.

3. *The penalty is disproportionate to the offense.*

It is well settled that penalties should be proportional to the offense. *CEG Robinson v. California*, 370 U.S. 669 (1962). Intelafone is an entrepreneurial, struggling company that had no net income in 2010 and 2011 and would not have been required to make USF contributions for those years. Assessing a \$4,200 fine on a start-up company has a devastating financial impact on it and is completely disproportionate to the nature of the inadvertent failure to file.

At the very least, the fine should be reduced to a \$100 per year failure to file a Form 499-A, which is certainly more proportional and comports more directly with the language of 47 CFR §54.712.

4. *The Commission should waive the late filing fee under the circumstances of this case.*

The FCC can exercise discretion pursuant to 47 CFR §1.3 to waive a rule "if special circumstances warrant a deviation from the general rule and such deviation will serve the public interest." *Northeast Cellular Telephone v. FCC* 897 Fed. 2d 1164, 1166 (DC Cir. 1990). The Commission may take into account considerations of equity, hardship or more effective implementation of overall policy. *Wait Radio v. FCC*, 418 Fed. 2d 1153, 1159 (DC Cir. 1969).

In this case, requiring payment of a \$4,200 fine against a nascent VoIP startup company would defy equity, impose a significant hardship on Intelafone and not implement the Commission's overall policy regarding universal service. Sustaining this penalty would send a message that elevates form over substance and endorses technical bureaucratic administrative action that serves no public purpose. Intelafone now knows that it has to file a Form 499-A and certainly will do so in the future. A \$4,200 fine is more than a slap on the hand to a company with negative net income for the offending years. The Commission has waived inadvertent errors for other companies seeking waivers regarding USAC reporting requirements in the past. See *In the matter of Universal Service Contribution Methodology Request for Review of a Decision of the Universal Service Administrator and Request for Waiver by American Broadband and Telecommunications*, 2013 WL 3815778, DA 13-1608 released July 22, 2013.

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V. CONCLUSION

Only this Commission can correct the USAC Administrator's actions, reversing the \$4,200 penalty assessment against Intelafone. Fairness and equity demands such a result, which will not harm the universal service contribution system, and which should not punish an inadvertent error with such a disproportionate penalty.

Respectfully Submitted,

GRAHAM & DUNN PC



Judith A. Endejan

Enclosures
m46569-2035097.doc



Universal Service Administrative Company
 19500 North Central Expressway, Suite 100
 Dallas, Texas 75241-3199

Filer 499 ID: 829720
 Invoice Number: UBDI0000643609
 Statement Date: 08/22/2013
 New Balance: \$ 3,625.00
 Payment Due Date: 09/13/2013
 Amount Enclosed:

Intelafone LLC
 Attention: Ryan Tilton
 PO Box 373,
 Kirkland, WA, 98033

Mail Payment To:

Universal Service Administrative Company
 PO Box 105056
 Atlanta, GA 30348-5056

Address Change? See reverse side for instructions.

If paying for multiple Filer 499 IDs, please check here and complete form on back.

Send top portion of statement with payment in enclosed envelope. Keep bottom portion for your records.

STATEMENT OF ACCOUNT

Date	Description	Charges	Credits
	Previous Balance	\$4,200.00	
08/09/2013	Payment		(\$575.00)
TOTAL OUTSTANDING USAC BALANCE AS OF 8/15/2013		\$3,625.00	

Transactions occurring after 08/15/2013 are not reflected on this statement.

Under the Debt Collection Improvement Act of 1996 (Pub. L. 104-134) (DCIA), your BALANCE DUE is a demand that you pay a DEBT owed to the United States on or before the DUE DATE. If the DUE DATE is non-business day, payment must be received the business day before that date. Any portion of the DEBT unpaid after the DUE DATE is a DELINQUENT DEBT, which may result in sanctions, including interest, penalties, and administrative charges. Failure to file a Telecommunications Worksheet may result in a late filing fee DEBT added to your BALANCE DUE. Read the reverse of this Invoice for important information about those sanctions and your legal rights and obligations.

Statement Date	Invoice Number	Filer 499 ID	Balance Due USAC						
08/22/2013	UBDI0000643609	829720	\$ 3,625.00						
FORM 499Q DATA		PAYMENT INFORMATION							
This month's support mechanism charges were calculated using an FCC contribution factor of 0.151000 and the following revenue data: <table border="0"> <tr> <td style="padding-right: 20px;">May 2013 499Q</td> <td></td> </tr> <tr> <td>120b</td> <td>\$10,000.00</td> </tr> <tr> <td>120c</td> <td>\$300.00</td> </tr> </table> If the figures do not correspond with your records, please contact USAC Customer Service at 888-641-8722		May 2013 499Q		120b	\$10,000.00	120c	\$300.00	All payments received (regardless of specific instructions) will be applied to your outstanding USAC balance in historical order as outlined in FCC order 07-150. Please remit ACH payments in a CCD+ format to ABA #071000039, Account #5590045653. All Wire Transfers should be sent to ABA #026009593, DDA (or Account) #5590045653. Payments must include your Company Name, Filer 499 ID, and Invoice Number to ensure timely posting.	
May 2013 499Q									
120b	\$10,000.00								
120c	\$300.00								



Universal Service Administrative Company

Helping keep America connected

Filer 499 ID: 829720
Invoice Number: UBDI0000643609
Statement Date: 08/22/2013

DETAILED SUMMARY OF CHARGES AND CREDITS

SUPPORT MECHANISM CHARGES

Your monthly support mechanism charges were calculated according to the following formulas:

Quarterly Contribution Base

The quarterly contribution base is a portion of your quarterly revenue that USAC considers when determining your quarterly Universal Service Fund contribution. The quarterly contribution base equals your interstate plus international revenue. Your current quarterly contribution base equals:

$$\frac{\$ 10,000.00}{\text{Interstate Revenue (Line 120B)}} + \frac{\$ 300.00}{\text{International Revenue (Line 120C)}} = \frac{\$ 10,300.00}{\text{Quarterly Contribution Base}}$$

Adjusted Quarterly Contribution

USAC adjusts carriers' quarterly contribution bases by the amount that they are expected to contribute in that quarter. The calculation for an adjusted contribution amount is as follows, and takes into account the circularity deduction:

$$\frac{\$ 10,300.00}{\text{Quarterly Contribution Base}} \times \frac{0.151000}{\text{FCC Contribution Factor}} = \frac{\text{Unadjusted Contribution}}$$

$$\frac{\text{Unadjusted Contribution}}{\text{Unadjusted Contribution}} - \left(\frac{\text{Unadjusted Contribution}}{\text{Unadjusted Contribution}} \times \frac{0.130784}{\text{FCC Circularity Factor}} \right) = \frac{\text{Adjusted Contribution}}$$



Universal Service Administrative Company

16 from Receipt, but it also is incorrect

Filer 499 ID: 829720
 Invoice Number: UBD10000643609
 Statement Date: 08/22/2013

De Minimis Eligibility

Carriers whose expected annual contribution is less than \$10,000 are considered de minimis and are exempted from paying into the Universal Service Fund. To be exempt, a carrier must meet the de minimis criteria on both the current 499A and 499Q forms.

You meet the de minimis criteria on both the 499A and the current 499Q. Therefore, you are eligible for the de minimis exemption during the current quarter.

Your eligibility was calculated using the contribution factors established by the FCC for determining de minimis status on each form:

499A:

<u>499A Contribution Base</u>	*	<u>0.144000</u> FCC Estimated Annual Factor	=	<u>Estimated 499A Contribution</u>
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499Q:

<u>Adjusted Contribution</u>	*	<u>4</u>	=	<u>Estimated 499Q Contribution</u>
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For more information on the FCC estimated annual factor, please see the Form 499A Instructions. For more information on the current FCC contribution factor, visit the FCC website at www.fcc.gov.

Support Mechanism Charges

Your total monthly contribution is determined by multiplying one-third of your adjusted quarterly contribution base by the current quarter's FCC contribution factor. Your contribution is then allocated among the four support mechanisms according to the established allocation percentages for the current quarter.

	1/3	*	<u>Adjusted Quarterly Contribution</u>	=	<u>Total Monthly Contribution</u>
			0.532682		\$ 0.00
<u>Total Monthly Contribution</u>	*	<u>High Cost Allocation Percentage</u>		=	<u>High Cost Support Mechanism Charge</u>
		0.160968			\$ 0.00
<u>Total Monthly Contribution</u>	*	<u>Low Income Allocation Percentage</u>		=	<u>Low Income Support Mechanism Charge</u>
		0.027302			\$ 0.00
<u>Total Monthly Contribution</u>	*	<u>Rural Health Care Allocation Percentage</u>		=	<u>Rural Health Care Support Mechanism Charge</u>
		0.279048			\$ 0.00
<u>Total Monthly Contribution</u>	*	<u>Schools & Libraries Allocation Percentage</u>		=	<u>Schools & Libraries Support Mechanism Charge</u>

Credits & Payments

Date	Description	Amount
08/09/2013	Payment	(\$575.00)
	TOTAL	(\$575.00)



United States Administrative College

Helping keep government on track

Filer 499 ID: 829720
 Invoice Number: UBD10000643609
 Statement Date: 08/22/2013

Interest & DCIA Penalties

A DELINQUENT DEBT incurs interest at the annual rate equal to the U.S. prime rate as of the DATE OF DELINQUENCY plus 3.5 percent from that DATE until the DEBT is paid in full. Any portion of the DEBT unpaid more than 90 days, incurs a penalty of 6 percent a year from the DATE OF DELINQUENCY. The reverse of the Invoice provides more information on interest, penalties, and administrative charges.

Payments & Credits Applied

Description - Debt Due Date	Principal	Payment/Credit Date	Interest Rate	Days Late	Additional Interest (B*(D/365)*E)	Accrued Interest	Total Interest (F+G)	Payment & Credits Applied	Interest Outstanding	Principal Outstanding
A	B	C	D	E	F	G	H	I	J	K
UBD10000637609 - 8/15/2013	\$4,200.00	8/9/13	6.75%	0	\$0.00	\$0.00	\$0.00	(\$575.00)	\$0.00	\$3,625.00
Outstanding Items										
UBD10000637609 - 8/15/2013	\$3,625.00		6.75%	0	\$0.00	\$0.00	\$0.00		\$0.00	\$3,625.00
					\$0.00			(\$575.00)	\$0.00	\$3,625.00
								Principal Outstanding		\$3,625.00
								Interest & Penalties		\$0.00
								Total Amount Due		\$3,625.00

I, RYAN TILTON, declare as follows:

1. I am the President and CEO of Intelafone LLC (Intelafone), P.O. Box 3733, Kirkland, Washington, 98003.

2. I have personal knowledge of the facts stated herein and if called to testify would and could do truthfully.

3. I started Intelafone sometime in 2010. My background is in telephony and I started Intelafone to provide VoIP based calling services. Initially I offered this service only to family members and close friends.

4. Intelafone did not make a profit for its first two years. Attached hereto as Exhibits A and B are my profit and loss statements for 2010 and 2011.

5. In 2012 I began offering Intelafone's services to the general public and made a small profit. Exhibit C is my profit and loss statement for 2012 showing a net income of \$4,996.

6. When I developed and started offering the Intelafone service to my friends and family in 2010 and 2011 I did not know that I needed to file an FCC Form 499-A. Indeed, I am still not sure that I needed to make a filing for Intelafone for those years.

7. I first obtained my FCC registration number on March 31, 2013. Exhibit D is a copy reflecting my FCC registration.

8. After obtaining an FCC registration number for my commercial operations, I first learned that an FCC Form 499-A needed to be filed even though my company was not required to make any universal service contributions because it had *de minimis* revenues.

9. I prepared an FCC Form 499-A for 2012 and in an abundance of caution prepared a FCC Form 499-A for 2010 and 2011. I submitted all of these forms to the Universal Service Administrative Company (USAC) at the same time.

10. In approximately July 2013 I received an invoice from USAC claiming that Intelafone owed \$4,200 in "charges." I did not keep a copy of this invoice. I did make a small payment of \$575 toward this charge.

11. I contacted USAC on July 22, 2013 about Intelafone's first USAC bill for \$4,200. Exhibit E is a copy of the email I sent to customer support for USAC.

12. Attached as Exhibit F is a copy of the response that I received from USAC claiming that the \$4,200 charge was due to charging Intelafone \$100 per month for each month that the Form 499-A had not been filed for 2010 and 2011. This email states "USAC does not waive late filing fees."

13. My company is extremely small. Having to pay a \$4,200 bill to USAC which is almost as much as the net income from Intelafone for 2012 would work a tremendous hardship on my company.

14. I now know that my company needs to submit a Form 499-A each year. I intend to do so in the future. My failure to file this form for 2010 and 2011 was due to my inadvertence and lack of understanding of the regulation that applies to a small company such as mine.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 10 day of September, 2013, at Seattle, Washington.

By: 
Ryan Tilton

12:03 PM
09/03/13
Cash Basis

Intelafone
Profit & Loss
January through December 2010

	<u>Jan - Dec 10</u>
Ordinary Income/Expense	
Income	
Residential Service	961.70
Sales - Hardware	270.80
Total Income	<u>1,232.50</u>
Gross Profit	1,232.50
Expense	
Advertising and Promotion	962.61
Bank Service Charges	316.85
Computer and Internet Expenses	1,481.24
Postage and delivery	52.73
Telephone Expense	956.10
Total Expense	<u>3,769.53</u>
Net Ordinary Income	<u>-2,537.03</u>
Net Income	<u><u>-2,537.03</u></u>

12:03 PM
09/03/13
Cash Basis

Intelafone
Profit & Loss
January through December 2011

	<u>Jan - Dec 11</u>
Ordinary Income/Expense	
Income	
Device Deposits	6,358.90
Faxing	162.33
International & Premium Service	715.73
Number Transfers	300.00
Residential Service	
On-Site Service	745.06
Residential Service - Other	14,515.82
Total Residential Service	<u>15,260.88</u>
Total Income	<u>22,797.84</u>
Gross Profit	22,797.84
Expense	
Advertising and Promotion	12,790.66
Bad Debt	134.78
Bank Service Charges	1,164.31
Charge Backs	0.00
Computer and Internet Expenses	9,647.54
Employee Instruction	66.26
Faxing Outbound	25.00
International Telephone Expense	354.98
Licensing	444.00
Outsourced Support	4,049.68
Postage and delivery	1,172.35
Telephone Expense	6,931.44
Toll Free Telephone Expense	324.81
Travel Expense	269.50
Web Development	22.00
Total Expense	<u>37,397.31</u>
Net Ordinary Income	-14,599.47
Other Income/Expense	
Other Income	
Finance Charges	5.00
Total Other Income	<u>5.00</u>
Other Expense	
State Taxes	274.57
Total Other Expense	<u>274.57</u>
Net Other Income	<u>-269.57</u>
Net Income	<u><u>-14,869.04</u></u>

12:02 PM
09/03/13
Cash Basis

Intelafone
Profit & Loss
January through December 2012

	<u>Jan - Dec 12</u>
Ordinary Income/Expense	
Income	
Device Deposits	2,949.09
Faxing	441.69
International & Premium Service	1,560.28
Number Transfers	960.00
Residential Service	
Collections	90.05
On-Site Service	50.00
Residential Service - Other	38,044.29
Total Residential Service	<u>38,184.34</u>
Total Income	<u>44,095.40</u>
Gross Profit	44,095.40
Expense	
Advertising and Promotion	10,257.47
Bank Service Charges	3,194.38
Charge Backs	169.85
Computer and Internet Expenses	5,938.57
Faxing Outbound	25.00
International Telephone Expense	659.75
Licensing	69.00
Office Supplies	143.05
Outsourced Support	6,527.50
Postage and delivery	981.60
Telephone Expense	10,500.52
Toll Free Telephone Expense	205.92
Total Expense	<u>38,672.61</u>
Net Ordinary Income	5,422.79
Other Income/Expense	
Other Income	
Finance Charges	1.00
Total Other Income	<u>1.00</u>
Other Expense	
State Taxes	427.53
Total Other Expense	<u>427.53</u>
Net Other Income	<u>-426.53</u>
Net Income	<u><u>4,996.26</u></u>



FCC Registration

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FRN Registration

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Thank you for registering with the FCC. As of today, **Mar 31 2013 6:34PM**, you have been assigned the following FCC Registration Number (FRN): **0022576631**. Please print this page for your records.

Domestic Business Registration

Business Type: Private Sector Subtype: Sole Proprietor
 Business Name: Intelafone LLC
 EIN: 532133830

Contact Information

Organization: Intelafone LLC Position: Owner
 Salutation: Mr First Name: Ryan
 Middle Initial: J Last Name: Tilton
 Suffix:

Address Line 1: PO Box 373 Address Line 2:
 City: Kirkland State: WASHINGTON
 Zip Code: 98033 Phone: 206 409 3906
 Fax: 206 408 1902 Email: rtilton@intelfone.com

Personal Security Question

PSQ: Pet's name

To better secure your personal information, the FCC no longer displays your Password or Personal Security Answer.

Amateurs, Aircraft, Marine, Antenna Structure Registration (ASR), and any other service licensed through the Universal Licensing System (ULS) should click on the following link to access ULS and associate their call sign(s) with their new FRN and password. Existing call signs must be associated with an FRN before you can file in ULS.

- [Universal Licensing System](#)

To visit another FCC site, follow the links below:

- [Auctions](#)
- [Call Sign Reservation and Authorization System](#)
- [Electronic Tariff Filing System](#)
- [Emergency Alert System](#)
- [Experimental Licensing Branch Electronic Filing Site](#)

From: Ryan Tilton [mailto:rtilton@intelafone.com]
Sent: Friday, July 26, 2013 9:33 PM
To: Customer Support
Subject: Billing Inquiry or Dispute

Requesters Name: Ryan Tilton

Filer ID:829720

Date of Invoice for this Inquiry or Dispute: 7/22/2013

Description of Inquiry or Dispute: Late filed worksheet fee

Hello:

I own a small telecommunications (voip) company. I just received my first USAC bill it totals \$4,200.

I am classified as a de-minimus provider. I filed for the first time this year and decided to backdate prior years when I sold service to friends and family as a small hobby company. My monthly contribution would have been \$6 per month in 2011 and \$124 per month in 2012, well under the de minimus amounts. I was unaware of the \$100 per month penalty for not filing during this period.

The reason I did not file is because I assumed since I owed nothing being de-minimus, usac would not hold it against me when I got my act together.

Is there any way this filing sanction can be reduced? I currently do not make enough per year to pay this bill. Please advise. Thank you! -Ryan

—
Ryan Tilton

President & CEO

www.Intelafone.com

Office: 206.409.9100

or 611 from your Intelafone

Fax: 206.408.1902

—
Reviews at

www.VoipReview.org



RE: Billing Inquiry or Dispute 829720

Customer Support <bcd.customerservice@usac.org>
To: Ryan Tilton <rtilton@intelafone.com>

Mon, Jul 29, 2013 at 10:11 AM

Good Afternoon Ryan,

All companies are subject to late filing sanctions on the FCC Form 499-A, as it is a required filing regardless of *de minimis* status. As indicated on your invoice, USAC received your filings as follows:

2011 FCC Form 499A received on 06/03/2013 (27 months late) --	27x100=2700
2012 FCC Form 499A received on 06/03/2013 (15 months late) –	15x100=1500
2013 FCC Form 499A received on 03/31/2013 (on time)	0x100= 0
	Total \$4,200

USAC does not waive late filing fees. If you cannot afford to make the full payment by the due date you may request for a payment plan to avoid being on RedLight status. Please follow the guideline available at <http://www.usac.org/cont/paying-invoices/payment-plans.aspx> for requesting a payment plan.

For further assistance you may call us at 888-641-8722 option 3.

Regards,

USAC Customer Operations

Tariqua, Customer Analyst III

Contact: 888-641-8722

Email: customersupport@usac.org

Website: www.usac.org

