

June 16, 2014

Oregon Public Utility Commission  
Attn: Residential Service Protection Fund  
3930 Fairview Industrial Drive SE  
Salem, OR 97302

**Re: Ztar Mobile, Inc.**  
**Docket No. UM 1517**  
**Request for waiver of RSPF late fees (OAR 860-033-0006)**

Attention -

On behalf of our client, Ztar Mobile, Inc. ("Ztar") (ID: 8347), The *Compliance* Group respectfully files the forgoing request for waiver of late fees assessed for untimely filing of the Oregon Residential Service Protection Fund (RSPF). The applicable time periods include June 2013 - March 2014, as summarized in the invoice summary generated by the Public Utilities Commission of Oregon, contained in **Exhibit A** of this filing.

Ztar is a small prepaid wireless provider offering prepaid wireless services in Oregon. The company understands the ongoing requirement to timely file RSPF reports with the Commission and the duty to ensure that RSPF funding is made within the prospective timeframes.

As background, Ztar late-filed several reports in late 2013 and early 2014 due to a change in its billing platform and regulatory compliance administration. The company previously engaged KPMG to handle outsourced regulatory compliance - including maintenance and processing of billing records. These compliance and reporting obligation were transferred from KPMG in mid-2013, but billing and compliance process was interrupted due to unanticipated complexities in the billing and report migration process. Specifically, the data necessary to prepare and remit the Oregon TRS was not properly transferred in a timely manner, hence Ztar was delayed in accessing the necessary access line counts and in remitting funds to the RSPF.

The following chart provides a summary of reporting obligations completed by Ztar in the past twelve (12) months.

Reporting Period	Access Lines	Fee Due
Jun-13	82	\$9.02
Jul-13	70	\$8.40
Aug-13	58	\$6.96
Sep-13	80	\$9.60
Oct-13	91	\$10.92
Nov-13	39	\$4.68

Dec-13	35	\$4.20
Jan-14	38	\$4.18
Feb-14	57	\$6.27
Mar-14	35	\$3.85
Apr-14	33	\$3.63
May-14	32	\$3.52
<b>Total:</b>		<b>\$75.23</b>

To date, all RSPF reports have been filed and calculated RSPF fees have been remitted to the Public Utility Commission of Oregon.

As the summary illustrates, the company has minimal intrastate telecommunications access lines (customers) and generates little revenue from customers in Oregon. Assessed late fees are far greater than the company's total interstate revenue for the applicable filing period. Because of this, imposition of the default \$100 per filing late fees will be highly detrimental to the company's business and service offering. For this reason, payment of the late fee would impose an undue hardship on the company.

Ztar understands and acknowledges the obligation to timely file RSPF reports, and has retained The *Compliance Group*, a third party reporting service provider, to ensure that RSPF reports are timely filed in the future.

Based on these facts, Ztar requests reconsideration of the outstanding late fees. Please do not hesitate to contact the undersigned with any questions.

Thank you for your consideration of this matter.

Respectfully submitted,



Chris Canter  
On behalf of Ztar Mobile, Inc.

**Exhibit A**

Invoice summary generated  
by the Public Utilities Commission of Oregon



# Residential Service Protection Fund

P.O. Box 2153  
Salem, OR 97308-2153

## RSPF Payment Invoice

PLEASE RETURN ONE COPY OF THIS  
INVOICE WITH YOUR PAYMENT.

**MAKE CHECK PAYABLE TO:**  
**OPUC / RSPF**

**OR ID # 8347**

DATE: 5/14/2014

ZTAR MOBILE INC  
16 VILLAGE LN STE 250  
COLLEYVILLE TX 76034

DESCRIPTION	CHARGE	AMOUNT
Jun, 2013 Late Form Fee	\$100.00 after 7/22/2013	\$99.18
Jul, 2013 Late Form Fee	\$100.00 after 8/21/2013	\$91.60
Aug, 2013 Late Form Fee	\$100.00 after 9/23/2013	\$93.04
Sep, 2013 Late Form Fee	\$100.00 after 10/21/2013	\$90.40
Oct, 2013 Late Form Fee	\$100.00 after 11/21/2013	\$89.08
Nov, 2013 Late Form Fee	\$100.00 after 12/23/2013	\$95.32
Dec, 2013 Late Form Fee	\$100.00 after 1/21/2014	\$95.80
Jan, 2014 Late Form Fee	\$100.00 after 2/21/2014	\$95.82
Feb, 2014 Late Form Fee	\$100.00 after 3/21/2014	\$93.26
Mar, 2014 Late Form Fee	\$100.00 after 4/21/2014	\$95.55
Feb, 2013 Late Payment Penalty	9.00% of Remittance, \$500.00 max	\$0.71
Mar, 2013 Late Payment Penalty	9.00% of Remittance, \$500.00 max	\$0.18
Jun, 2013 Late Payment Penalty	9.00% of Remittance, \$500.00 max	\$1.03
Jul, 2013 Late Payment Penalty	9.00% of Remittance, \$500.00 max	\$1.03
Aug, 2013 Late Payment Penalty	9.00% of Remittance, \$500.00 max	\$1.03
Sep, 2013 Late Payment Penalty	9.00% of Remittance, \$500.00 max	\$1.03
Oct, 2013 Late Payment Penalty	9.00% of Remittance, \$500.00 max	\$1.03
Nov, 2013 Late Payment Penalty	9.00% of Remittance, \$500.00 max	\$1.03
Dec, 2013 Late Payment Penalty	9.00% of Remittance, \$500.00 max	\$1.03
Jan, 2014 Late Payment Penalty	9.00% of Remittance, \$500.00 max	\$0.94
Feb, 2014 Late Payment Penalty	9.00% of Remittance, \$500.00 max	\$0.94
Mar, 2014 Late Payment Penalty	9.00% of Remittance, \$500.00 max	\$0.94
Feb, 2013 Interest	9.00% per annum	\$0.82
Mar, 2013 Interest	9.00% per annum	\$0.19
Jun, 2013 Interest	9.00% per annum	\$0.90
Jul, 2013 Interest	9.00% per annum	\$0.91

Aug, 2013 Interest	9.00% per annum	\$0.88
Sep, 2013 Interest	9.00% per annum	\$0.63
Oct, 2013 Interest	9.00% per annum	\$0.47
Nov, 2013 Interest	9.00% per annum	\$0.60
Dec, 2013 Interest	9.00% per annum	\$0.48
Jan, 2014 Interest	9.00% per annum	\$0.31
Feb, 2014 Interest	9.00% per annum	\$0.21
Mar, 2014 Interest	9.00% per annum	\$0.02
Feb, 2013 Remittance	Remittance Base	\$7.92
Jun, 2013 Remittance	Remittance Base	\$9.84
Jul, 2013 Remittance	Remittance Base	\$8.40
Aug, 2013 Remittance	Remittance Base	\$6.96
Sep, 2013 Remittance	Remittance Base	\$9.60
Oct, 2013 Remittance	Remittance Base	\$10.92
Nov, 2013 Remittance	Remittance Base	\$4.68
Dec, 2013 Remittance	Remittance Base	\$4.20
Jan, 2014 Remittance	Remittance Base	\$4.18
Feb, 2014 Remittance	Remittance Base	\$6.27
Mar, 2014 Remittance	Remittance Base	\$3.85
<b>TOTAL due if received in PUC's office by 5 PM PT 5/14/2014:</b>		<b>\$1,033.21</b>

Estimate the date the payment will be received by PUC and add additional interest to your payment. Interest continues to accrue at a daily interest amount of \$0.02 until full payment received by PUC.

**Please include your Oregon ID number (8347) on your check.**

Mail your payment to: **OPUC / RSPF**  
**P.O. Box 2153**  
**Salem, OR 97308-2153**