

From: [DAVIS Diane](#)
To: [DAVIS Diane](#)
Subject: FW: Service Ticket #19428 - Peerless Regulatory Mail - Monday, April 27, 2020_OR_RSPF_Fine Notice
Date: Wednesday, May 6, 2020 10:47:44 AM
Attachments: [image002.png](#)

From: Katherine Whitt <kwhitt@gsaudits.com>
Sent: Friday, May 1, 2020 7:34 AM
To: Julie Oost <joost@peerlessnetwork.com>; CRAY Jon W <jon.cray@puc.state.or.us>
Cc: DL-Compliance <compliance@peerlessnetwork.com>; Pat Phipps <[pphipps@peerlessnetwork.com](mailto:ppphipps@peerlessnetwork.com)>
Subject: Service Ticket #19428 - Peerless Regulatory Mail - Monday, April 27, 2020_OR_RSPF_Fine Notice

RE: Peerless Network of Oregon LLC (#8353) - Oregon RSPF Surcharge Remittance - February 2020

Hi Jon – We received the attached. I believe you needed a copy – please see here and advise on the next steps from us.

Thanks,

Best Regards,
Kitty

From: Julie Oost <joost@peerlessnetwork.com>
Sent: Tuesday, April 21, 2020 10:43 AM
To: Katherine Whitt <kwhitt@gsaudits.com>; CRAY Jon W <jon.cray@state.or.us>
Cc: DL-Compliance <compliance@peerlessnetwork.com>; Pat Phipps <[pphipps@peerlessnetwork.com](mailto:ppphipps@peerlessnetwork.com)>
Subject: Re: Peerless Network of Oregon LLC (#8353) - Oregon RSPF Surcharge Remittance - February 2020

Hi Folks. Thanks for your efforts on this. I give permission to use and file this email thread as the company's official request for a waiver through our agency's filing center. Please let me know if you need anything further.

Thanks again.

Julie Oost

peerless network

Julie M. Oost | VP Regulatory Affairs and Contracts
222 S. Riverside Plaza, Suite 1900 | Chicago, IL 60606
O: 312.878.4137 | JOost@peerlessnetwork.com
Website: www.peerlessnetwork.com

From: Katherine Whitt <kwhitt@gsaudits.com>
Date: Tuesday, April 21, 2020 at 12:33 PM
To: CRAY Jon W <jon.cray@state.or.us>
Cc: Julie Oost <joost@peerlessnetwork.com>, DL-Compliance <compliance@peerlessnetwork.com>, Pat Phipps <pphipps@peerlessnetwork.com>
Subject: RE: Peerless Network of Oregon LLC (#8353) - Oregon RSPF Surcharge Remittance - February 2020

[External Message – please use caution]

Thanks Jon – We will be looking for the forthcoming mail and notify you once it is received.

Julie – Per the below – please give authorization to Jon, via the State of Oregon, to move forward and work with me on the final steps of waiving the February 2020 OR RSPF late filing fee that is currently being assessed.

Thank you, everyone!

Best Regards,
Kitty

From: CRAY Jon W <jon.cray@state.or.us>
Sent: Tuesday, April 21, 2020 10:12 AM
To: Katherine Whitt <kwhitt@gsaudits.com>
Subject: RE: Peerless Network of Oregon LLC (#8353) - Oregon RSPF Surcharge Remittance - February 2020

You're most welcome. All I need is notice that you received the Notice of Proposed Assessment (this is forthcoming in the mail) and Julie's permission to file this email with our commission on behalf of the company.

Kindest regards,
Jon

From: Katherine Whitt <kwhitt@gsaudits.com>
Sent: Tuesday, April 21, 2020 10:09 AM
To: CRAY Jon W <jon.cray@puc.state.or.us>; Julie Oost <joost@peerlessnetwork.com>
Cc: DL-Compliance <compliance@peerlessnetwork.com>; LACKEY Frank <Frank.Lackey@puc.state.or.us>; Regulatory Dept. <Regulatory@gsaudits.com>; Noelle Ard <noelle@gsaudits.com>; Orvin Moore <orvinm@gsaudits.com>
Subject: RE: Peerless Network of Oregon LLC (#8353) - Oregon RSPF Surcharge Remittance - February 2020

Dear Mr. Cray – I/we send my/our most sincere and grateful appreciation to you for honoring this request (so quickly) to waive the February 2020 late filing fee for Peerless Network.

Please let me know if you need anything else from me on this – otherwise I will be looking for the final determination from the committee once the agenda has been posted.

Stay Well and Take Care and Bless You!

Best Regards,
Kitty

Katherine “Kitty” Whitt

Regulatory Advisor

Global Strategic Accountants, LLC

6250 Shiloh Rd. Suite 110

Alpharetta, GA 30005

678-212-1030 Direct

678-487-8808 Fax

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From: CRAY Jon W <jon.cray@state.or.us>
Sent: Tuesday, April 21, 2020 9:38 AM
To: Katherine Whitt <kwhitt@gsaudits.com>; Julie Oost <joost@peerlessnetwork.com>
Cc: DL-Compliance <compliance@peerlessnetwork.com>; LACKEY Frank <frank.lackey@state.or.us>; Regulatory Dept. <Regulatory@gsaudits.com>
Subject: RE: Peerless Network of Oregon LLC (#8353) - Oregon RSPF Surcharge Remittance - February 2020

Hi, Kitty, my colleague, Frank, copied me so I could respond. I am prepared to recommend that our commission grant your request for a waiver. The circumstances you described below in these unprecedented times is, I believe, good cause.

As soon as you receive what we refer to as the Notice of Proposed Assessment, would you please respond to this email indicating receipt? Also, **Julie**, would you please indicate whether I have permission to use and file this email thread as the company's official request for a waiver through our agency's filing center?

After I file the request, I will draft a memo recommending that our commission grant the company's waiver request at a public meeting on the consent agenda. If an item is on a consent agenda, it means the issue is not disputed and will generally be adopted by the commission. Also, attendance is not required at the public meeting; I don't generally attend public meetings if I have an item(s) on the consent agenda.

If you have any further questions or concerns, please do let me know.

Stay safe,

Jon Cray | Residential Service Protection Fund Program Manager | jon.cray@state.or.us
Public Utility Commission of Oregon | 201 High Street SE | Salem, OR 97301
Tel: 503-373-1400 | Videophone: 503-567-7815 | Fax: 503-378-6047 | www.rspf.org

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From: LACKEY Frank <Frank.Lackey@puc.state.or.us>
Sent: Tuesday, April 21, 2020 8:35 AM
To: Katherine Whitt <kwhitt@gsaudits.com>
Cc: DL-Compliance <compliance@peerlessnetwork.com>; Regulatory Dept. <Regulatory@gsaudits.com>; Julie Oost <joost@peerlessnetwork.com>; CRAY Jon W <jon.cray@puc.state.or.us>
Subject: Peerless Network of Oregon LLC (#8353) - Oregon RSPF Surcharge Remittance - February 2020
Importance: High

Good Morning Kitty,

Thank you for the information.

Unfortunately, RSPF staff doesn't have authority to waive the penalty. If you're interested in pursuing a waiver, then once you receive the NOTICE OF PROPOSED ASSESSMENT (NOPA) that will be issued on 4/23/2020, if the February 2020 assessment is not paid by 4/23/20, you would need to file a written waiver request under Docket No. UM 1517 (following the instructions on the back of the NOTICE) ***describing the circumstances beyond your control*** that caused the late filing (see OAR 860-033-0006[1]). Your request would then escalate to a public meeting for a ruling by our Commissioners.

The payment must be received by 5:00 p.m. on the 21st of each month.

Frank

From: Katherine Whitt <kwhitt@gsaudits.com>
Sent: Tuesday, April 21, 2020 7:45 AM
To: LACKEY Frank <Frank.Lackey@puc.state.or.us>
Cc: DL-Compliance <compliance@peerlessnetwork.com>; Regulatory Dept. <Regulatory@gsaudits.com>; Julie Oost <joost@peerlessnetwork.com>
Subject: Service Ticket #18646 - FW: Peerless Network of Oregon LLC (#8353) - Oregon RSPF Surcharge Remittance - February 2020

Hi Frank – Nice to have you back! Hope all is well and you are healing up nicely!

Please note; I too was out for a long period of time with a bad illness.

However, I am back now and have confirmed that in my absence other GSA filers did assist me in filing the items that I was responsible for. We have all tried very diligently to make all the deadlines during the same period of time that our entire office was forced to shelter in place and learn to work remotely. And I do show Jan – March 2020 have been filed and I apologize if no one noted a late filing fee for me on this for the February period.

However, due to the circumstances and my usual and in consideration of my normal and prompt filing history previously is there any way we can receive grace on this fine? We would like to have it waived if at all possible. Please let me know if this is an option based on all the unfortunate events that occurred leading up to the tardy report.

Thank you,

Best Regards,
Kitty

From: Julie Oost <joost@peerlessnetwork.com>
Sent: Monday, April 20, 2020 3:30 PM
To: Katherine Whitt <kwhitt@gsaudits.com>; Regulatory Dept. <Regulatory@gsaudits.com>
Cc: DL-Compliance <compliance@peerlessnetwork.com>
Subject: FW: Peerless Network of Oregon LLC (#8353) - Oregon RSPF Surcharge Remittance - February 2020

Hi Kitty. Please see below and advise.
Thanks much.

Julie Oost

peerless network

Julie M. Oost | VP Regulatory Affairs and Contracts
222 S. Riverside Plaza, Suite 1900 | Chicago, IL 60606
O: 312.878.4137 | JOost@peerlessnetwork.com
Website: www.peerlessnetwork.com

From: LACKEY Frank <frank.lackey@state.or.us>
Date: Monday, April 20, 2020 at 5:27 PM
To: Julie Oost <joost@peerlessnetwork.com>, DL-Compliance <compliance@peerlessnetwork.com>, Pat Phipps <pphipps@peerlessnetwork.com>
Cc: "compliance@gsaudits.com" <compliance@gsaudits.com>
Subject: RE: Peerless Network of Oregon LLC (#8353) - Oregon RSPF Surcharge Remittance - February 2020

[External Message – please use caution]

Good Afternoon,

I have not received a response to this request. Would you please look into this and respond.

Thank you.

Frank

From: LACKEY Frank
Sent: Tuesday, April 14, 2020 2:01 PM
To: Julie Oost <joost@peerlessnetwork.com>; DL-Compliance <compliance@peerlessnetwork.com>; pphipps@peerlessnetwork.com
Cc: compliance@gsaudits.com

Subject: RE: Peerless Network of Oregon LLC (#8353) - Oregon RSPF Surcharge Remittance - February 2020
Importance: High

Good Afternoon Julie,

Kathy Shepherd filled in for me while I would out for an extended medical leave (knee replacement). I'm catching up on my emails. Can you please tell me if the company has mailed the payment? If so when?

If it has been mailed but is being delayed by the national shutdown I'll just wait until our accounting department lets me know it's in.

Please let me know if you have any questions. I can be reached at my remote location at 503 910-5966 or email me.

Thanks.

Frank

From: SHEPHERD Kathy <Kathy.Shepherd@puc.state.or.us>
Sent: Wednesday, April 8, 2020 10:50 AM
To: Julie Oost <joost@peerlessnetwork.com>; DL-Compliance <compliance@peerlessnetwork.com>; pphipp@peerlessnetwork.com
Cc: compliance@gsaudits.com; LACKEY Frank <Frank.Lackey@puc.state.or.us>
Subject: Peerless Network of Oregon LLC (#8353) - Oregon RSPF Surcharge Remittance - February 2020
Importance: High

The Oregon Public Utility Commission sent the attached late notice to Peerless Network of Oregon LLC on 3/24/2020 for failure to file the 2/2020 RSPF Surcharge Remittance Form 751. The form has not yet been filed and the \$100 late fee remains unpaid.

Today (4/8/2020) is the deadline to avoid further collection activity. Please login to the RSPF Online System (<https://apps.rspf.org/>), file the Form 751, and pay the late fee TODAY.

Let me know if you have questions. Thank you.

Kathy Shepherd for Frank Lackey, RSPF Compliance Specialist
Oregon Public Utility Commission
201 High St SE, Salem OR 97301
PO Box 1088, Salem OR 97308-1088
kathy.shepherd@state.or.us, (503) 378-8959

From: Julie Oost <joost@peerlessnetwork.com>
Sent: Friday, March 27, 2020 3:34 PM
To: SHEPHERD Kathy <Kathy.Shepherd@puc.state.or.us>; DL-Compliance <compliance@peerlessnetwork.com>
Subject: Re: Return to Sender - Late Remittance Letter for Peerless Networks of Oregon LLC (#8353)

Thank you for forwarding, Kathy. I'm not sure why it was returned but we will ensure it is handled. Thanks again and have a good weekend.

Julie Oost

peerless network

Julie M. Oost | VP Regulatory Affairs and Contracts
222 S. Riverside Plaza, Suite 1900 | Chicago, IL 60606
O: 312.878.4137 | JOost@peerlessnetwork.com
Website: www.peerlessnetwork.com

From: SHEPHERD Kathy <kathy.shepherd@state.or.us>
Date: Friday, March 27, 2020 at 5:30 PM
To: Pat Phipps <[pphipps@peerlessnetwork.com](mailto:ppphipps@peerlessnetwork.com)>, DL-Compliance <compliance@peerlessnetwork.com>
Cc: "samuel@gsaudits.com" <samuel@gsaudits.com>
Subject: Return to Sender - Late Remittance Letter for Peerless Networks of Oregon LLC (#8353)

[External Message – please use caution]

The Oregon Public Utility Commission received the attached returned mail for #8353 Peerless Networks of Oregon LLC (late filing notice for February 2020 RSPF Surcharge Remittance Form 751). I've changed the address in our system, but am forwarding the letter via email as we are working remotely due to the COVID-19 outbreak.

Kathy Shepherd, Senior Telecom Provider Compliance Specialist
Oregon Public Utility Commission
201 High St SE, Salem OR 97301
PO Box 1088, Salem OR 97308-1088
kathy.shepherd@state.or.us, (503) 378-8959

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