

Washington Exchange Carrier Association

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June 28, 2010

David W. Danner, Executive Director and Secretary
Washington State Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

2010 JUN 30 AM 8:09
STATE OF WASHINGTON
COMMUNICATIONS
DIVISION

RE: WAC 480-120-399(a)(i)
WAC 480-120-352(5)

Dear Mr. Danner;

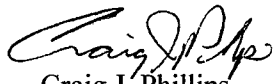
Enclosed is a report (Attachment 4, dated 06/18/10) showing WECA fund collections and distributions to each member company for the 2009 WECA administered pools. The report also shows 2009 originating and terminating CCL access minutes by company. **Attachment 4 is filed on a confidential basis pursuant to WAC 480-07-160 because it contains company-specific proprietary financial data, the disclosure of which could be detrimental to the company and provide competitors with access to competitively sensitive data. The information should not be disclosed to other parties without the written consent of the affected companies.** The persons that might be affected by disclosure include the individual companies listed on Attachment 4. Pursuant to the Commission's rule under WAC 480-07-160(3)(c)(iii), the original and three redacted copies of Attachment 4 are enclosed. WECA respectfully requests waiver of the requirement to submit twelve copies of the unredacted version. One copy of the unredacted version is submitted in a sealed envelope along with this letter. The sealed envelope is marked as confidential.

WECA pool access revenues are collected from interexchange carriers (IXCs) providing intrastate toll services in the state of Washington. The IXCs pay access charges that are assessed per WECA Tariff WN U-1. In addition to the WECA access charges, all non-WECA local exchange carriers operating within the state of Washington are supposed to assess the USF rate at \$.00152 per access minute on all intrastate originating and terminating access minutes and remit the resulting revenues to WECA.

Pool distributions are based upon each company's respective revenue objective. The revenue objective for WeavTel was revised effective March 1, 2009 per WUTC Order 05 in Docket UT-060762. At that time the other WECA member company's revenue objectives were also updated to reflect 2007 actual pool distributions. Accordingly, the 2009 revenue objectives are based upon two months of 2006 pool distributions, and ten months of 2007 pool distributions.

Also enclosed are schedules that list WECA member companies, WECA Board and Committee membership, and WECA Docket activities. Also enclosed, as supplemental information, is a copy of our latest annual report that covers the 2008 WECA pool year.

Sincerely,



Craig J. Phillips
Administrator
Enclosures