



**WHIDBEY**  
TELECOM

*Local Voice Services – High Speed Internet  
Long Distance – Security & Alarms – WhidbeyTV*

August 1, 2019

**BY ELECTRONIC FILING  
VIA WUTC WEB PORTAL**

Mr. Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
621 Woodland Square Loop SE  
Lacey, WA 98503

Dear Mr. Johnson:

Re: 2019 Petition to Receive Support from the State  
Universal Communications Services Program –  
CLAIM OF CONFIDENTIALITY

Pursuant to WAC 480-123-110, on behalf of Whidbey Telephone Company (“Company”) accompanying this letter for filing with the Washington Utilities and Transportation Commission (“Commission”) is the Company’s petition to receive support for the fiscal year ending June 30, 2020, from the State Universal Communications Services Program established by RCW 80.36.350 (“Petition”).

The accompanying filing includes the petition for support and exhibits that are specified in WAC 480-123-100 and WAC 480-123-110. More specifically, this filing consists of an electronic version (in .pdf format) of this cover letter and electronic versions (in .pdf format) of both redacted and unredacted versions of the above-mentioned petition and exhibits. Electronic versions (in Excel (.xlsx) format) of the Financial Template (from which Exhibit 4 has been generated) and Exhibit 4.1 (containing broadband connection and gross capital expenditure information) are also included in this filing.

Please note that portions of the information in the petition and accompanying exhibits, as well as the above-mentioned electronic version (in Excel format) of Exhibit 4.1, are being filed on a confidential basis pursuant to WAC 480-07-160. The Company hereby asserts a claim of confidentiality with respect thereto. The basis for this claim is that the portions of the petition, including the exhibits, that have been designated as

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confidential, and the Excel file of Exhibit 4.1, contain valuable commercial information, including confidential marketing, cost and financial information. In addition to the Company, the persons and entities named in Exhibit 1 to the Petition might be directly affected by disclosure of the confidential information.

If the Commission has any questions regarding the enclosed petition, please do not hesitate to contact me by e-mail at [gary.ricketts@whidbeytel.com](mailto:gary.ricketts@whidbeytel.com) or call me at (360) 321-0051.

Sincerely,

A handwritten signature in blue ink that reads "Gary Ricketts".

Gary Ricketts  
Secretary & Treasurer

Accompanying Files (including this file):

- WhidbeyTelCo-Pet-UCSP-Suprt-CLtr-8-1-19.pdf
- WhidbeyTelCo-Pet-UCSP-Suprt-Pet-8-1-19 (CONFIDENTIAL).pdf
- WhidbeyTelCo-Pet-UCSP-Suprt-Pet-8-1-19 (REDACTED).pdf
- WhidbeyTelCo-Pet-UCSP-Suprt-Exh-4-Excel-8-1-19.xlsx
- WhidbeyTelCo-Pet-UCSP Suprt-Exh-4.1-Excel-8-1-19  
(CONFIDENTIAL).xlsx