



June 18, 2018

**BY WASHINGTON UTC WEB PORTAL**

Mr. Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities and  
Transportation Commission  
1300 S. Evergreen Park Drive SW  
P. O. Box 47250  
Olympia, WA 98504-7250

Received  
Records Management  
06/18/18 11:09  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

Dear Mr. Johnson:

Re: WUTC Docket No. UT-180003 –  
Whidbey Telephone Company –  
Access Recovery Charges and Connect America Fund –  
CONFIDENTIAL TREATMENT REQUESTED

On behalf of Whidbey Telephone Company (“Company”), accompanying this letter for filing with the Washington Utilities and Transportation Commission (“Commission” or “WUTC”) is a copy of data pertaining to the Company that the National Exchange Carrier Association, Inc. (“NECA”) has indicated have been provided by NECA to the Federal Communications Commission (“FCC”) and the Universal Service Administrative Company (“USAC”) concurrent with NECA’s 2018 Annual Tariff Filing. It is the Company’s understanding that these data were filed by NECA, on the Company’s behalf, with the FCC and USAC pursuant to Section 54.304(d)(1) of the FCC’s rules and regulations, 47 C.F.R. § 54.304(d)(1), as establishing the Company’s projected eligibility for CAF ICC funding during the upcoming funding period pursuant to Section 51.917 of the FCC’s rules and regulations, 47 C.F.R. §51.917, including any true-ups, pursuant to said Section 51.917, associated with an earlier funding period.

Because of the CONFIDENTIAL nature of the information set forth in portions of the accompanying document, pursuant to RCW 80.04.095 and WAC 480-07-160 the Company hereby asserts a claim of confidentiality with respect thereto. The basis for this claim is that the document contains valuable commercial information, including confidential marketing, cost and financial information. Accordingly, as contemplated by WAC 480-07-160(3)(c), unredacted and redacted versions of that document accompany

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this letter. As specified in WAC 480-07-160(3)(b)(i), both copies (unredacted and redacted) of the accompanying document have been marked "Designated information is confidential Per WAC 480-07-160." The redacted version has been marked "REDACTED." The unredacted version has been marked "UNREDACTED."

Please let us know if the Commission has any questions regarding the accompanying document or the information it presents.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "C. Burns".

Christopher Burns  
Chief Operating Officer

Accompanying Document  
(Unredacted and Redacted Versions)