Washington **Exchange Carrier Association**

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October 15, 2014

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

RE: Docket #131243

Dear Mr. King;

Enclosed is an updated report (Attachment 4, dated 06/16/14) showing final WECA fund collections and distributions to each member company for the 2012 WECA administered pools. The report also shows final 2012 originating and terminating CCL access minutes by company. This updated report reflects the final true-ups submitted by companies to close the 2012 WECA pools. Adjustments were made to reflect calendar year reporting for those companies that are reporting on a billing cycle basis, as well as to reflect any corrections submitted by companies to the monthly amounts previously reported.

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RECORDS MANAGEME

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), the original and a redacted copy of Attachment 4 are enclosed. WECA respectfully requests waiver of the requirement to submit twelve copies of the unredacted version required by WAC 480-07-160(3)(c)(iii). 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. Effective May 29, 2011 CenturyTel of Washington including CenturyTel of Inter-Island, and CenturyTel of Cowiche exited the Interim USF Pool and the CCL Pool. Accordingly, WECA member companies' revenue objectives were updated at that time to reflect 2010 actual pool distributions. As a result, the 2012 revenue objectives reflect 12 months of 2010 pool distributions.

Sincerely,

Craig J. Phillips Administrator Enclosures