



July 31, 2019

**BY UTC WEB PORTAL**

Mr. Mark Johnson, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
Olympia, WA 98504-7250

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 Tenino Telephone Company (“Company”) hereby petitions the Washington Utilities and Transportation Commission to receive support from the Universal Communications Services Program for the fiscal year ending June 30, 2020.

The petition for support and exhibits that are specified in WAC 480-123-100 and WAC 480-123-110 accompany this letter and are being filed electronically via the Commission’s web portal. This filing consists of an electronic version (in .pdf format) of this cover letter, the petition and both redacted and unredacted versions of the exhibits. In addition, electronic versions (in Excel (.xlsx) format) of the Financial Template (from which Exhibit 4 has been generated) and both redacted and unredacted versions of Exhibit 4.1 (containing broadband connection and gross capital expenditure information) are being 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 confidential, and the Excel file of Exhibit 4.1, contain valuable commercial information, including confidential marketing, cost and financial information.<sup>1</sup>

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<sup>1</sup> Other persons (including entities) that might be directly affected by disclosure of the confidential information include each of the entities shown on Exhibit 1 to the above-mentioned petition, as well as the individual owners of the Company’s parent company, Scatter Creek Limited.

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If the Commission has any questions regarding the enclosed petition, please do not hesitate to contact me by e-mail at [rick@scattercreek.net](mailto:rick@scattercreek.net) or call me at (360) 264-2915.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Vitzthum", with a long horizontal flourish extending to the right.

Rick Vitzthum  
Chief Financial Officer

Accompanying files (including this file):

NEW-TeninoTelCo-PET-UCSP-2019-08-01(C).zip  
NEW-TeninoTelCo-PET-UCSP-2019-08-01(R).zip  
NEW-TeninoTelCo-EXH-4-UCSP-2019-08-01.xlsx  
NEW-TeninoTelCo-EXH-4.1-UCSP-2019-08-01(C).xlsx  
NEW-TeninoTelCo-EXH-4.1-UCSP-2019-08-01(R).xlsx