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July 13, 2009

VIA E-MAIL AND HAND DELIVERY

David Danner, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98504-7250

Re: Docket No. UT-090922 - Inland Telephone Company

Dear Mr. Danner:

This letter is submitted in response to a request by Commission Staff for an explanation of why Inland Telephone Company ("Inland") has chosen to file a tariff revision that would remove the Suncadia Resort from Inland's service territory in light of the Commission's Order in Docket UT-050606. The reason is that there has been a substantial change in circumstance.

The Commission Staff testimony in the prior docket, UT-050606, was predicated to a great extent upon the premise that Inland would need to be available to provide service to the Suncadia Resort if there was a business failure of the CLEC then serving the Suncadia Resort, Intelligent Community Services or ICS. The Commission's Order accepted that premise and, thus, to a great extent, the underlying theory for the Commission's Order is that Inland would need to be available in case there was a business failure on the part of ICS.

This leads us to the change in circumstances. There was a major business failure by ICS in the spring of this year. ICS filed for bankruptcy. ICS filed to withdraw its telecommunications services in the State of Washington. With that business failure that worried Commission Staff, was Inland needed to step in to provide service to the Suncadia Resort? The answer

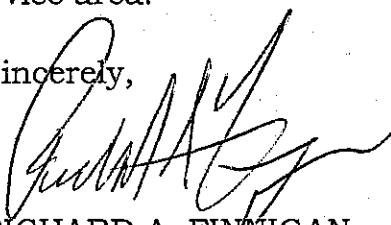
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was a resounding no.

The owners of the Suncadia Resort quickly found another CLEC (although unregistered at the current date) to provide services to Suncadia Resort. The owners of the Suncadia Resort made it very clear that they wanted no service from Inland within the Suncadia Resort.¹

Since the underlying premise for Commission Staff testimony and the Commission's Order have proven to be inaccurate in the real world events surrounding Suncadia Resort, Inland believes that it is appropriate to file to remove that territory from Inland's service area.

Sincerely,



RICHARD A. FINNIGAN

RAF/km

cc: Clients (via e-mail)

¹ Inland has long provided fifty copper pair for Suncadia's marketing offices. However, the owners of the Suncadia Resort made it very clear that they do not want any additional services from Inland, particularly service to residential customers or business entities within the Resort.