



# Pioneer Telephone Company

P.O. Box 207 • LaCrosse, WA 99143  
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*Serving LaCrosse, Endicott, Winona, Hooper, Dusty, and Hay*

July 30, 2018

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

Re: Petition to Receive Support from the State Universal Communications  
Services Program Pursuant to WAC 480-123-100 and 480-123-110

Received  
Records Management  
07/30/18 13:44  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

## CLAIM OF CONFIDENTIALITY

Dear Mr. Johnson:

Pursuant to WAC 480-123-100 and WAC 480-123-110, Pioneer Telephone Company ("Company") hereby petitions the Washington Utilities and Transportation Commission ("WUTC") to receive support from the State Universal Communications Services Program for the Program year 2019.

The petition for support and exhibits that are specified in WAC 480-123-100 and WAC 480-123-110 accompany this letter and, together with this letter, are being filed electronically. The electronic filing includes .pdf format files for this letter, the petition and the exhibits. Exhibits 4 have also been provided in Excel format per WUTC staff request.

Exhibit 7 is only certified for calendar year 2016 because the Company no longer receives high-cost loop and interstate common line support since the Company elected model base support known as Alternative Connect America Cost Model (ACAM) that began January 2017, except for true-ups for prior year(s) funding. While the Company did not perform an adjustment for this petition, the Company believes that for Return on Equity purposes, ACAM revenues should be removed. The reason is that the monies are dedicated to strict construction requirements and call for additional investment, which means including these funds in the Return on Equity calculation overstates the true obtained return.

Please note that portions of the information in the accompanying exhibits are being filed on a confidential basis pursuant to WAC 480-07-160, in that certain of the information contained therein constitutes valuable and confidential commercial information, including financial information. In addition to the Company, its parent company, Pioneer Telephone Holding Company, Inc., might be directly affected by disclosure of the confidential information. Both confidential (unredacted) and redacted versions accompany this letter.

Sincerely,

Durand Cox  
President

Enclosures