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October 30 2006

VIA HAND DELIVERY

Ms. Carole J. Washburn, Executive Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, WA 98504-7250

Re: Docket No. UT-061284 – Staff Investigation of the Missoula Plan –
Confidential Work Paper

CLAIM OF CONFIDENTIALITY

Dear Ms. Washburn:

Attached is a confidential work paper. This work paper should be treated as confidential pursuant to RCW 80.04.095 and WAC 480-07-160.

The basis upon which the information is claimed to be confidential is that the work paper contains highly sensitive financial information related to each of the companies set forth on the work paper.

The entities that might be directly affected by disclosure of the confidential information are as follows: Asotin Telephone Company, CenturyTel of Washington, CenturyTel of Inter-Island, CenturyTel of Cowiche, Ellensburg Telephone Company, Hat Island Telephone Company, Hood Canal Telephone Co., Inland Telephone Company, Kalama Telephone Company, Lewis River Telephone Company, Mashell Telecom, Inc., McDaniel Telephone Company, Pend Oreille Telephone Company, Pioneer Telephone Company, St. John Co-operative Telephone and Telegraph Company, Tenino Telephone Company, The Toledo Telephone Co., Inc., Western Wahkiakum County Telephone Co., Whidbey Telecom and YCOM Networks, Inc.

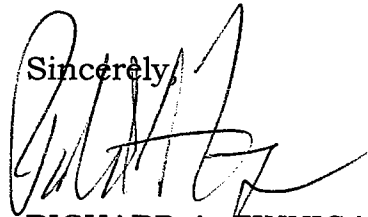
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Carole Washburn
October 30, 2006
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The work paper is being submitted in both redacted form and un-redacted version. The un-redacted version is highlighted in contrasting color and sealed in an enveloped marked "Confidential Per RCW 80.04.095 and WAC 480-07-160."

Pursuant to WAC 480-07-160(3)(c)(iii), the original and three redacted copies have been submitted along with the original and twelve copies of the un-redacted version.

Sincerely,

A handwritten signature in black ink, appearing to read 'RAF', with a long horizontal flourish extending to the right.

RICHARD A. FINNIGAN

RAF/km
Enclosures

cc: Clients

MISSOULA PLAN - RESTRUCTURE MECHANISM

Company Name	Minute-Based Intrastate Switched Access Revenue	WECA Distribution Adjustment	Adjusted Minute Based Intrastate Switched Access Revenue	Interstate Rate**	Total Intrastate Access Minutes Reported	Revenue at Interstate Rate	Total Transition Target*	Year 1 Transition Target	Access Lines	Year 1 SLC Increase	Year 1 Restructure Mechanism Support
Asotin Telephone Company											
CenturyTel											
Ellensburg Telephone Company											
Hat Island Telephone Company											
Hood Canal Telephone Co.											
Inland Telephone Company											
Kalama Telephone Company											
Lewis River Telephone Company											
Mashell Telecom, Inc.											
McDaniel Telephone Company											
Pend Oreille Telephone Company											
Pioneer Telephone Company											
St. John Co-Operative Telephone and Telegraph Company											
Tenino Telephone Company											
The Toledo Telephone Co., Inc.											
Western Wahkiakum County Telephone Co.											
Whidbey Telecom											
YCOM Networks, Inc.											
Total											

*Does not include amounts from net compensation under Traffic Exchange Agreements with wireless carriers. To the extent the contract rate exceeds the interstate access rate for a company, there will be an additional amount to transfer to the Restructure Mechanism.

**Relies on a "snapshot" view of latest effective billing rate as reported by each company.

NOTE: This analysis does not address removal of high cost loop cap.

MISSOULA PLAN - RESTRUCTURE MECHANISM

Company Name	Total Transition Per Line	Total Transition Per Line Per Month	Total SLC Increase Revenue	Total Restructure Mechanism Support
Asotin Telephone Company				
CenturyTel				
Ellensburg Telephone Company				
Hat Island Telephone Company				
Hood Canal Telephone Co.				
Inland Telephone Company				
Kalama Telephone Company				
Lewis River Telephone Company				
Mashell Telecom, Inc.				
McDaniel Telephone Company				
Pend Oreille Telephone Company				
Pioneer Telephone Company				
St. John Co-Operative Telephone and Telegraph Company				
Tenino Telephone Company				
The Toledo Telephone Co., Inc.				
Western Wahkiakum County Telephone Co.				
Whidbey Telecom				
YCOM Networks, Inc.				
Total				

*Does not include amounts from net compensation under Traffic Exchange Agreements with wireless carriers. To the extent the contract rate exceeds the interstate access rate for a company, there will be an additional amount to transfer to the Restructure Mechanism.

**Relies on a "snapshot" view of latest effective billing rate as reported by each company.

NOTE: This analysis does not address removal of high cost loop cap.