



October 15, 2013

BY ELECTRONIC FILING
VIA WUTC WEB PORTAL

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

CLAIM OF CONFIDENTIALITY

Dear Mr. King:

Re: Docket No. UT-133009 –
FCC Form 481 due October 15, 2013 -
Whidbey Telephone Company (Study Area 522452)

Accompanying this letter for filing with the Washington Utilities and Transportation Commission (“Commission”) is an electronic copy of the FCC Form 481 (including attachments), due October 15, 2013, of Whidbey Telephone Company, as filed electronically with the United States Administrative Company pursuant to Sections 54.313 and 54.422 of the rules of the Federal Communications Commission, 47 C.F.R. §§ 54.313 and 54.422.

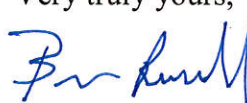
Because of the CONFIDENTIAL nature of the information set forth in portions of the accompanying copy the FCC Form 481, pursuant to RCW 80.04.095 and WAC 480-07-160 the Company hereby asserts a claim of confidentiality with respect thereto. The basis for this claim is that the accompanying copy of FCC Form 481 contains valuable commercial information, including confidential marketing, cost and financial information. Accordingly, in compliance with WAC 480-07-160(3)(c), unredacted and redacted versions of that document accompany this letter. As specified in WAC 480-07-160(3)(b)(i), all copies (both redacted and unredacted) of materials claimed to be confidential have been marked “CONFIDENTIAL PER WAC 480-070-160.” The redacted version has been marked “REDACTED.” The unredacted version has been

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marked "UNREDACTED," and the information thereon that is claimed to be confidential has been highlighted with grey shading.

If the Commission has any questions regarding the enclosed documents, please do not hesitate to call me at (360) 321-0086.

Very truly yours,



Bruce Russell
Chief Operating Officer

Accompanying documents:

- FCC Form 481 (copy - redacted)
- FCC Form 481 (copy - unredacted)