



August 14, 2006

**BY ELECTRONIC FILING  
AND CERTIFIED MAIL,  
RETURN RECEIPT REQUESTED**

Ms. Carole J. Washburn, Executive Secretary  
Washington Utilities and Transportation Commission  
P. O. Box 47250  
1300 South Evergreen Park Drive, SW  
Olympia, WA 98504-7250

Dear Ms. Washburn:

Re: Docket No. UT-063052 –  
Whidbey Telephone Company -  
Supplement to August 11, 2006, Filing

**CLAIM OF CONFIDENTIALITY**

On Friday, August 11, 2006, Whidbey Telephone Company (“Whidbey”) caused to be filed with the Washington Utilities and Transportation Commission (“Commission”) in the above-referenced docket a request that the Commission certify to the Federal Communications Commission and the Universal Service Administrative Company that the Company has met the requirements of 47 C.F.R. §54.314 for eligibility for continued receipt of federal high-cost funds, together with reports and certifications in accordance with WAC 480-123-060, -070 and -080 (“August 11 Filing”). The August 11 Filing was made electronically via the Commission’s web portal, and a paper original of the filing was also mailed to the Commission on August 11, 2006.

This letter supplements the letter of transmittal contained in the August 11 Filing and includes, in substitution for the document enclosed therewith entitled “Reports As Referenced in WAC 480-123-070 and WAC 480-123-080” (“Reports”), two new versions of the Reports, which are described more fully in the penultimate paragraph of this letter. The reason for this supplementation and substitution is to set forth a claim of confidentiality in accordance with RCW 80.04.095 and WAC 480-09-160 with respect to portions of the Reports.

Because of the CONFIDENTIAL nature of the information set forth in portions of the Reports, including the attachments thereto, 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 Reports and their attachments contain 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 those documents are enclosed. 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 versions have been marked “REDACTED.” The unredacted versions have been marked “UNREDACTED,” the information thereon that is claimed to be confidential has been marked by contrasting highlighter, they have been printed on yellow paper, and they are enclosed in a separate sealed envelope, also marked “CONFIDENTIAL PER WAC 480-07-160.”

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In accordance with the foregoing, the Company respectfully requests that the enclosed Reports documents be substituted for the Reports that were included in the August 11 Filing.

If the Commission has any questions regarding the enclosed materials, please let us know.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Russell". The signature is written in a cursive, flowing style.

Bruce A. Russell  
Chief Financial Officer

Enclosures