



*Local Telephone Services – Internet & Broadband – Long Distance  
Security & Alarms – Data Center Services*

September 24, 2014

**BY ELECTRONIC FILING  
VIA WUTC WEB PORTAL  
AND FIRST CLASS MAIL**

Mr. Steven V. King, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
1300 South Evergreen Park Drive, SW  
Olympia, WA 98504-7250

Dear Mr. King:

Re: Docket No. UT-143041 – Petition to Receive  
Support from the State Universal Communications  
Services Program – Supplemental Filing

Under covering letter dated August 1, 2014, Whidbey Telephone Company (“Company”) submitted to the Washington Utilities and Transportation Commission (“Commission”) for filing the Company’s Petition to Receive Support from the state universal communications services program established by RCW 80.36.650 (“Petition”). That filing was submitted under a claim of confidentiality, in accordance with RCW 80.04.095 and WAC 480-07-160.

Since the date of the above-mentioned filing, the Company has been advised by the Commission Staff of certain concerns arising from the Company’s assertion of the above-mentioned claim of confidentiality. In order to resolve those concerns, accompanying this letter is a copy (both on paper and as an electronic .xlsx file) of the “RLEC Model Attachment 2” that was developed in connection with earlier consideration by the Commission of the need for a state universal service fund,<sup>1</sup> and that has been updated to reflect Company data for the calendar year 2013. The information set forth in that document is being submitted to the Commission free of any claim by the

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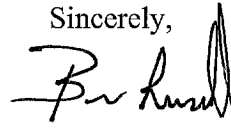
<sup>1</sup> A copy of the form of the RLEC Model Attachment 2 was included as Exhibit 1 to the Comments of the Washington Independent Telecommunications Association, dated and filed August 2, 2013, in Docket No. UT-131239.

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Company of confidentiality pursuant to RCW 80.04.095 or WAC 480-07-160. In addition, the Company hereby agrees that the Commission may treat the Company's achieved rate of return on equity, as calculated by the Commission Staff based upon the financial information included in the Petition, as not being subject to any claim by the Company of confidentiality pursuant to RCW 80.04.095 or WAC 480-07-160, notwithstanding that such rate of return may have been calculated utilizing information to which such a claim of confidentiality has been asserted.

If the Commission has any questions regarding the foregoing or the populated RLEC Model Attachment 2 that accompanies this letter, please do not hesitate to contact me by e-mail at [bruce.russell@whidbeytel.com](mailto:bruce.russell@whidbeytel.com) or call me at (360) 321-0086.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Russell". The signature is fluid and cursive, with a prominent vertical stroke at the end.

Bruce Russell  
Chief Operating Officer

Accompanying Document