



December 17, 2016

BY WASHINGTON UTC WEB PORTAL

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

Dear Mr. King:

Re: WUTC Docket No. UT-160029 –
Whidbey Telephone Company –
CAF ICC SUPPORT –
Updated Submission -
CONFIDENTIAL TREATMENT REQUESTED

Under covering letter dated June 16, 2016, on behalf of Whidbey Telephone Company (“Company”), we submitted to the Washington Utilities and Transportation Commission (“Commission” or “WUTC”) for filing a copy of data pertaining to the Company that the National Exchange Carrier Association, Inc. (“NECA”) had indicated had been provided by NECA to the Federal Communications Commission (“FCC”) and the Universal Service Administrative Company (“USAC”) concurrent with NECA’s 2016 Annual Tariff Filing.¹ It is the Company’s understanding that those data were filed by NECA, on the Company’s behalf, with the FCC and USAC pursuant to Section 54.304(d)(1) of the FCC’s rules and regulations, 47 C.F.R. § 54.304(d)(1), as establishing the Company’s projected eligibility for CAF ICC funding during the upcoming funding period pursuant to Section 51.917 of the FCC’s rules and regulations, 47 C.F.R. §51.917, including any true-ups, pursuant to said Section 51.917, associated with an earlier funding period.

¹ The Company’s above-mentioned June 16, 2016, letter inadvertently referred to NECA’s 2015 Annual Tariff Filing. That reference should instead have been to NECA’s 2016 Annual Tariff Filing.

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As a result of regulatory changes, there has been a revision to the above-mentioned data, with a revised filing of such data to be made by NECA with the FCC and submission by NECA of a copy of the revised data to USAC on December 19, 2016. Accordingly, consistent with the above-referenced FCC rules and regulations, accompanying this letter is a copy of the said revised data.

Because of the CONFIDENTIAL nature of the information set forth in portions of the accompanying document, 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 document contains valuable commercial information, including confidential marketing, cost and financial information. Accordingly, as contemplated by 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), both copies (unredacted and redacted) of the accompanying document have been marked "CONFIDENTIAL PER WAC 480-07-160." The redacted version has been marked "REDACTED." The unredacted version has been marked "UNREDACTED."

Please let us know if the Commission has any questions regarding the accompanying document or the information it presents.

Respectfully submitted,



Frank McIntyre
Secretary/Treasurer

Accompanying Document
(Unredacted and Redacted Versions)