



February 8, 2017

**BY ELECTRONIC FILING  
VIA WUTC WEB PORTAL**

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-160032 –  
WAC 480-123-130(1)(e) –  
Summary FCC Form 477 –  
CLAIM OF CONFIDENTIALITY

In accordance with WAC 480-123-130(1)(e) and guidance received from the Staff of the Washington Utilities and Transportation Commission (“Commission”), on behalf of Whidbey Telephone Company and Hat Island Telephone Company (“Companies”), accompanying this letter for filing with the Commission is a copy of the “Form 477 Filing Summary” for the Companies’ FCC Form 477 due September 1, 2016, revised February 8, 2017, as filed with the Federal Communications Commission (“FCC”).

Because of the CONFIDENTIAL nature of the information set forth in portions of the accompanying copy of the Form 477 Filing Summary, pursuant to RCW 80.04.095 and WAC 480-07-160 the Companies hereby assert a claim of confidentiality with respect thereto. The basis for this claim is that the portions of the accompanying copy of the Form 477 Filing Summary that have been marked as “confidential” contain valuable commercial information, including confidential marketing, cost and/or 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), both redacted and unredacted versions of materials claimed to be confidential have been marked “CONFIDENTIAL PER WAC 480-07-160.” The redacted version has been marked “REDACTED.” The unredacted version has been

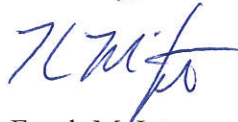
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marked "UNREDACTED," and the information thereon that is claimed to be confidential has been highlighted with grey shading.

The accompanying electronic documents are in .pdf format only. Because the Form 477 Filing Summary is generated by an FCC filing system, the Companies do not have available to them a copy of it in any of the other formats listed in WAC 480-07-140(6)(b).

If the Commission has any questions regarding the accompanying copy of the Form 477 Filing Summary, please do not hesitate to contact me by e-mail at [frank.mcintyre@whidbeytel.com](mailto:frank.mcintyre@whidbeytel.com) or call me at (360) 321-0088.

Sincerely,

A handwritten signature in blue ink, appearing to read "Frank McIntyre".

Frank McIntyre  
Chief Operating Officer

Accompanying documents