



July 31, 2007

**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-073015 –
Request for Certification Pursuant to
WAC 480-123-060 and 47 C.F.R. § 54.314

CLAIM OF CONFIDENTIALITY

Pursuant to WAC 480-123-060, Whidbey Telephone Company (“Company”) hereby requests that the Washington Utilities and Transportation Commission (“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.

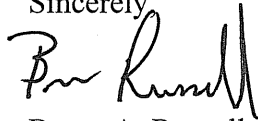
Because of the CONFIDENTIAL nature of the information set forth in portions of the Reports, including the attachments thereto, pursuant to RCW 80.04.095 and WAC 480-07-160 the Company hereby asserts a claim of confidentiality with respect thereto. The basis for this claim is that the Reports and their 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 480-07-160.” 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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The certifications and reports that are specified in WAC 480-123-060, WAC 480-123-070 and WAC 480-123-080 are enclosed.

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

Sincerely,



Bruce A. Russell
Chief Financial Officer

Enclosures