



August 20, 2019

**BY ELECTRONIC FILING
VIA WUTC WEB PORTAL**

Mr. Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
621 Woodland Square Loop SE
Lacey, WA 98503

Dear Mr. Johnson:

Re: Docket UT- 190582
Supplement to 2019 Annual Reports on High
Cost Fund Pursuant to 480-123-070 and -080

Under covering letter dated July 19, 2019, Whidbey Telephone Company (the "Company") submitted 2019 ETC Certification to the Washington Utilities and Transportation Commission for filing the Company's reports pursuant to WAC 480-123-070 and -080 due July 1, 2018. Included in that submission was a document entitled "ETC ANNUAL REPORTS PER WAC 480-123-070 and WAC 480-123-080." Report 1 in that document contained the following statement:

"Per the direction of the Commission Staff, the NECA -USF1010 report will be provided as soon as it is available and no later than August 1, 2019."

In accordance with the statement quoted above and as a supplement to the Company's reports previously filed in the above-referenced docket, accompanying this letter is a copy of the Company's NECA-USF1010 report for the calendar year 2019, dated 7/29/2019.

Because of the CONFIDENTIAL nature of the information set forth in portions of the accompanying copy the FCC Form 481, 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(5)(c), unredacted and redacted versions of that document accompany this letter. As specified in WAC

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480-07-160(5)(c)(i), both copies (unredacted and redacted) of the accompanying document have been marked "Shaded information is designated as confidential per WAC 480-07-160." The redacted version has been marked "REDACTED."

Please let us know if the Commission has any questions regarding the enclosed reports.

Sincerely,



Gary Ricketts
Secretary/Treasurer
Whidbey Telephone Company

Accompanying documents