

THE TOLEDO TELEPHONE CO., INC.
P.O. BOX 669, TOLEDO, WASHINGTON 98591
TELEPHONE 360-864-4552

December 12, 2003

Executive Secretary
Washington Utilities and Transportation Commission
Attn: David Dittmore Re: UT-031755
P. O. Box 47250
Olympia, WA 98104

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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

Dear Mr. Dittmore:

This letter is respectfully submitted on behalf of The Toledo Telephone Co., Inc. ("Company") in response to the letter, dated November 4, 2003, of the Washington Utilities and Transportation Commission ("Commission"), giving notice of the recent adoption by the Commission of WAC 480-120-414. That rule addresses the filing by telecommunications companies of certain information with the Commission and certain other information with the Washington state emergency management division.

It appears to the Company that, by reason of RCW 80.04.530, WAC 480-120-414 has no application to the Company. Nevertheless, the Company is furnishing to the Washington state emergency management division the titles and telephone numbers of the requested personnel and to the Commission as a courtesy under the circumstances described more fully below.

Because the information described in WAC 480-120-414 relates to recovery under what may be critical circumstances, the Company does not believe that it necessarily will expedite, rather it may impede, recovery for such information to be widely distributed to the public, as opposed to being available to only those having a need to know it for purposes of facilitating recovery efforts. There appears to be at least two disadvantages to such information being publicly available: (1) in the event of a disaster that is caused intentionally by terrorism or otherwise, the availability of such information could facilitate deliberate impairment or recovery capability or interference with recovery efforts; and (2) public calls to disclosed contact numbers during disaster conditions could lead to those numbers becoming unreachable for more urgent recovery communications.¹

¹ In subsection (5) of WAC 480-120-412 ("Major Outages"), the Commission recognizes that security concerns may warrant limitation on the dissemination of information to the public:

"Unless heightened security concerns exist, during major outage recovery efforts all companies must implement procedures to disseminate information to the public, public officials, and news media."

We have noted that the Commission has published on its website filings containing disaster recovery contact information submitted by at least some other telecommunications companies pursuant to WAC 480-120-414. We do not know whether the Commission has received other filings pursuant to WAC 480-120-414 that it has not so published, or whether the Commission has procedures to limit the dissemination of such information. (The above-referenced Commission letter of November 4, 2003, makes no mention of any such procedures.) Given the Company's discomfort with publication of such information pertaining to the Company, and further given that the rule does not appear to be obligatory upon the Company, the Company respectfully requests that the information described in WAC 480-120-414(1)(a) or (2) to the Commission not be disseminated to the general public and be used and disclosed solely for disaster response and recovery purposes.

The following is a list of emergency contacts for The Toledo Telephone Co., Inc. The company is a single exchange carrier serving the area of Toledo, Washington.

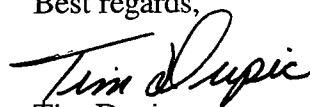
Russell Ramsey
Vice President & Chief Technical Officer
360-864-2011

1st Alternate
Tim Dupic
General Manager
360-864-2004

2nd Alternate
David Gregson
Central Office Manager
360-864-2002

Please do not hesitate to contact me with any questions regarding this matter.

Best regards,


Tim Dupic
General Manager

Cc: Emergency Management Division