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November 18, 2005

BY E-MAIL ONLY (records@wutc.wa.gov)

Ms. Carole J. Washburn
Executive Secretary
Washington Utilities and
Transportation Commission
P. O. Box 47250
Olympia, WA 98504

Dear Ms. Washburn:

Re: **Whidbey Telephone Company d/b/a Whidbey Telecom –
Tariff WN U-5 – Revisions to Schedule 40 (“Concurrences”) –
LSN Order Requested**

On behalf of Whidbey Telephone Company (“Company”), enclosed herewith for filing, in .pdf electronic format, are originals of the following new or revised sheets to the Company’s Tariff WN U-5:

Third Revision of Sheet No. 290	Original Sheet No. 290.9.1
Original Sheet No. 290.3.1	First Revision of Sheet No. 290.10
Original Sheet No. 290.3.2	Original Sheet No. 290.10.1
First Revision of Sheet No. 290.7	First Revision of Sheet No. 290.10a
Original Sheet No. 290.7.1	Original Sheet No. 290.10a.1
Original Sheet No. 290.7.2	Original Sheet No. 290.10.4
First Revision of Sheet No. 290.8	Original Sheet No. 290.10.5
Original Sheet No. 290.8.1	Second Revision of Sheet No. 294
First Revision of Sheet No. 290.9	

The enclosed tariff revisions, which affect Schedule 40 (“Concurrences”) of the Company’s Tariff WN U-5, modify and update the Company’s concurrence for purposes of offering intrastate access services within the State of Washington. The revisions amend the Company’s concurrence to update the reference to the tariff in which the Company concurs - from Continental Telephone Company of the Northwest, Inc. Tariff WN U-6 to Washington Exchange Carrier Association Tariff WN U-2. The revisions also update a number of the rates and charges set forth in the concurrence to conform to the Company’s corresponding interstate rates and charges, as reflected in Tariff FCC No. 5 of the National Exchange Carrier Association, Inc., of which the Company is an issuing carrier. Finally, the revisions update the wire center information applicable to the Company’s wire centers for purposes of intrastate access services by incorporating into the Company’s concurrence a reference to the wire center information in Tariff FCC No. 4 of the National Exchange Carrier Association, Inc.

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d/b/a Whidbey Telecom

The enclosed revisions are also being filed to facilitate a transition from an environment in which Qwest Corporation ("Qwest") has been the designated toll provider for purposes of intrastate private line services jointly provided by Qwest and the Company to an environment in which Qwest will no longer have that role. Qwest has requested relief from its designated toll carrier responsibility with respect to such jointly provided private line services in its petition filed in the Commission's Docket No. UT-051726, with the contemplated transition of affected end user billing to occur effective December 15, 2005.

The proposed tariff revisions, if they become effective, will decrease some of the Company's special access rates and increase others. A schedule showing these changes for those recurring rate elements that affect existing customers is enclosed.

The enclosed tariff sheets have an issued date of November 18, 2005, and an inserted effective date of December 19, 2005. However, pursuant to WAC 480-80-122, the Company respectfully requests that the Commission issue an order allowing the enclosed tariff sheets to become effective with less than statutory notice on December 15, 2005, so as to allow the effective date of the tariff revisions to coincide with the date of the billing transition contemplated by Qwest's petition in Docket No. UT-051726.

Notice of the filing of the enclosed tariff sheets is being posted in the Company's business office(s). A copy of the text of that notice is enclosed. In addition, we are advised that Qwest has caused a joint notice from Qwest and the Company to be mailed to the billing address of each affected end user customer that currently has service that would be affected by the enclosed tariff sheets becoming effective if Qwest's petition in Docket No. UT-051726 were to be granted. A declaration evidencing such mailing has been filed by Qwest in Docket No. UT-051726.

Any questions regarding the enclosed filing should be directed to the undersigned.

Very truly yours,



Robert S. Snyder
Attorney for Whidbey Telephone Company

Enclosures

cc: Whidbey Telephone Company