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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 11 (“Foreign
Exchange Service”) – 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:

Second Revision of Sheet No. 150	First Revision of Sheet No. 152
Original Sheet No. 150.1	Original Sheet No. 152.1
Original Sheet No. 150.2	First Revision of Sheet No. 154
Second Revision of Sheet No. 151	Original Sheet No. 154.1
Original Sheet No. 151.1	Original Sheet No. 154.2

The enclosed tariff revisions modify Schedule 11 (“Foreign Exchange Service”) of the Company’s Tariff WN U-5. More specifically, they revise the application the tariff to non-contiguous foreign exchange service (*i.e.*, foreign exchange service between non-contiguous exchanges) and clarify the application of Schedule 11 to non-contiguous foreign exchange service where the foreign exchange (*i.e.*, the exchange from which dial tone is provided) is a Company exchange. The enclosed tariff revisions also modify portions of Schedule 11 applicable to contiguous foreign exchange service (*i.e.*, foreign exchange service between contiguous exchanges) in order to accommodate the tariff changes applicable to non-contiguous foreign exchange service.

The proposed tariff revisions are being filed in order to adjust the Company’s offering of non-contiguous foreign exchange service to accommodate a contemplated change in the status of Qwest Corporation (“Qwest”) as the designated toll provider for Washington intrastate intraLATA private line services having at least one end furnished by the Company. Under current arrangements, some of the Company’s charges for non-contiguous foreign exchange service have been billed to Qwest in its role as designated toll provider for intrastate intraLATA private line services. In the Commission’s Docket No.

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UT-051726, Qwest has filed a petition requesting that its role as designated toll provider with respect to private line services (including non-contiguous foreign exchange services) involving the Company come to end, with a contemplated billing transition date of December 15, 2005. If Qwest's petition is granted, some charges with respect to non-contiguous foreign exchange service that have previously been billed to Qwest will become the responsibility of the end user customer. The enclosed tariff sheets adjust the tariff to accommodate that change, while at the same time reducing the level of the Company's combined charges for non-contiguous foreign exchange service. Certain special access rate elements that have formerly been charged to Qwest with respect to such service (such as channel mileage termination, channel mileage facility and signaling capability) will no longer apply; however, interexchange mileage charges will apply, as well as a foreign exchange service function charge (which previously applied to only closed end foreign exchange service and now will also apply to open end non-contiguous foreign exchange service). The manner of calculating interexchange mileage charges is also revised to utilize the distance between serving wire centers involved in the non-contiguous foreign exchange service, rather than the distance between message toll rate centers.

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