Law Office of

### Richard A. Finnigan

Richard A. Finnigan 2112 Black Lake Blvd. SW Candace Shofstall

(360) 956-7001 Olympia, Washington 98512 Legal Assistant

rickfinn@localaccess.com (360) 753-7012

candaces@localaccess.com

September 15, 2014

VIA ELECTRONIC FILING AND HAND DELIVERY

Mr. Steven V. King, Executive Director and Secretary

Washington Utilities and Transportation Commission

1300 South Evergreen Park Drive SW

Olympia, WA 98504-7250

Re: The Toledo Telephone Co., Inc. - Change of Bill Date

Dear Mr. King:

The Toledo Telephone Co., Inc. ("Toledo") would like to change its bill cutoff date from the 23rd of the month to the last day of the month. This will make bills easier to understand for customers and is helpful for Toledo as well. Please note that this does not affect local service. What this affects is the billing of toll charges that are incurred by the customers.

In order to implement this change, Toledo will need to send its first bill out after the change covering a thirty-seven or thirty-eight day period of time (depending on whether it is a month with thirty days or thirty-one days) rather than a thirty day period of time. As a result, Toledo is seeking an order allowing it to deviate from its tariff rule No. 6, copy attached. Rule 6 can be read as requiring at least one bill each month. In addition, the company requests a one time waiver of WAC 480-120-161(1) which requires a monthly interval for bills.

If the waivers are granted, customers will be notified in advance of the change in cutoff date and that the change will result in the first bill after the change including the additional period of time.

Sincerely,

Richard A. Finnigan

RAF/cs

cc: Bill Weinman (via email)

Client (via email)