



July 30, 2015

**BY ELECTRONIC FILING
VIA WUTC WEB PORTAL
AND HAND DELIVERY**

Mr. Steven V. King, Executive Director and Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
1300 South Evergreen Park Drive, SW
Olympia, WA 98504-7250

Dear Mr. King:

Re: 2015 Petition to Receive Support from the State
Universal Communications Services Program –
CLAIM OF CONFIDENTIALITY

Pursuant to WAC 480-123-110, on behalf of Tenino Telephone Company (“Company”) enclosed herewith for filing with the Washington Utilities and Transportation Commission (“Commission”) is an original, unredacted version of the Company’s Petition to Receive Support from the state universal communications services program established by RCW 80.36.650 (“Petition”), together with an original of a redacted version of the Petition.¹ This filing is being made both on paper and electronically via the Commission’s web portal, and included with the web portal submission, in addition to a copy each unique document comprising the paper filing, is an electronic copy, in .xlsx format, of two Excel workbooks from which Exhibit 4 to the Petition was produced.

Because of the CONFIDENTIAL nature of the information set forth in portions of the accompanying Petition, including the exhibits thereto, 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 portions of the Petition, including the exhibits, that have been marked as “confidential” contain valuable commercial information, including confidential marketing, cost and financial information.² Accordingly, in compliance with WAC 480-07-160(3)(c), unredacted and redacted versions of those documents accompany this letter. As specified in

¹ Pursuant to agreement with Commission Staff, only one copy of the confidential version of material being filed confidentially is provided, notwithstanding WAC 480-07-160(3)(c)(iii).

² Other persons (including entities) that might be directly affected by disclosure of the confidential information include each of the entities shown on Exhibit 1 to the above-mentioned Petition, as well as the individual owners of the Company’s parent company, Scatter Creek Limited.

Mr. Steven V. King, Executive Director and Secretary
Washington Utilities and Transportation Commission
July 30, 2015
Page 2

WAC 480-07-160(3)(b)(i), the original (both redacted and unredacted) of materials claimed to be confidential have been marked "CONFIDENTIAL PER WAC 480-07-160." The redacted version has been marked "REDACTED." The unredacted version has been marked "UNREDACTED," and the information thereon that is claimed to be confidential has been highlighted with grey shading. In the paper version of the filing, the pages of the unredacted original that contain information claimed to be confidential have been printed on yellow paper, as required by WAC 480-07-160, and the unredacted original has been enclosed in a separate sealed envelope, marked "CONFIDENTIAL PER WAC 480-07-160."

For the electronic filing, native version of the petition and exhibits have been included with the exception of Exhibit 5 and Exhibit 6 which are only available in PDF format.

If the Commission has any questions regarding the enclosed petition, please do not hesitate to contact me by e-mail at shanson@scattercreek.net or call me at (360) 264-2915.

Sincerely,

A handwritten signature in black ink, appearing to read "SHANSON". The signature is fluid and cursive, with the first letter 'S' being particularly large and stylized.

Steven D. Hanson
President

Accompanying Documents