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September 11, 2007

**VIA ELECTRONIC MAIL & FEDERAL EXPRESS**

Carole J. Washburn  
Executive Secretary  
Washington Utilities and Transportation Commission  
Post Office Box 47250  
1300 S. Evergreen Park Dr. SW  
Olympia, Washington 98504-7250

Subject: Docket No. UT-073015 - Supplement to Recertification Filing of Rural Cellular Corporation for 2007

Dear Ms. Washburn:

Pursuant to WAC 480-123-060, Rural Cellular Corporation hereby submits one copy of its Supplement To Recertification Filing and exhibits in the above-referenced docket as follows:

- Tab A Declaration Certifying Use of Universal Service Funds (previously filed).
- Tab B 2006 Service Improvement Plan re Use of Funds – **Confidential** (revised 9/11/07).
- Tab C Local Service Outage Report – **Confidential** (previously filed).
- Tab D Unfulfilled Request for Service – **Confidential** (previously filed).
- Tab E Complaints per 1,000 handsets – **Confidential** (revised 9/11/07).
- Tab F Declaration Certifying Compliance With Applicable Service Quality Standards And Consumer Protection Rules (previously filed).
- Tab G Declaration Certifying Ability To Function In Emergency Situations (supplemented 9/11/07).

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Tab H Declaration Certifying Lifeline Advertising – **Confidential**  
(revised 9/11/07).

Tab I Service Improvement Plan, October 2007 through  
September 2008 – **Confidential** (supplemented 9/11/07).

Tab J .jpg version of coverage map (previously filed) – **Confidential**  
(.shp map revised 9/11/07) – **Confidential**.

Please note that paper copies of all confidential portions of the report are copied on yellow paper,<sup>1</sup> designated on each page as "confidential Per WAC 480-07-160," and contained in a sealed envelope marked "Confidential Per WAC 480-07-160." For the electronic version of this filing, each electronic file contains, as part of the file name, the word "CONFIDENTIAL." Additionally, each page in the electronic file is labeled "Confidential Per WAC 480-07-160."

Finally, as required by WAC 480-123-080, a CD is filed with the paper copies of this filing containing .shp format map files of coverage. The CD is labeled "Confidential Per WAC 480-07-160. However, the .shp format is not readily amenable to marking each page "confidential." Accordingly, RCC respectfully requests that the requirement of WAC 480-07-160(1)(b)(ii) to mark each page in the file as "confidential" be waived.

Pursuant to RCW §80.04.095 enclosures designated as "confidential" contain valuable commercial information, including trade secrets and confidential marketing, cost, or financial information, or customer-specific usage and network configuration and design information. Accordingly, pursuant to RCW §80.04.095 such information should not be subject to inspection or copying under RCW Chapter 42.56. Moreover, the records designated as "confidential" contain valuable formulae, designs, and research data, the disclosure of which would produce private gain and public loss and should be exempt from public disclosure pursuant to RCW 42.56.270(1).

In addition to the undersigned, the following might be directly affected by disclosure of the confidential information:

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<sup>1</sup> An exception is the .pdf version of the coverage map, which is printed on white paper. The map is a color map and would not render well on yellow paper.



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Attention: Elizabeth Kohler

If you have any questions please contact the undersigned.

Very truly yours,

Brooks E. Harlow, P.C.

cc: Mr. Bob Shirley  
Mr. Tim Zawislak  
Ms. Deborah Reynolds