

March 30, 2019

**Via electronic filing**

Steven V. King  
Secretary and Executive Director  
c/o Washington Utilities and Transportation Commission  
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Received  
Records Management  
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State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

Re: *In the matter of the Petition of YourTel America, Inc. for an Exemption from WAC 480-123(1)(d),(f) and (g), and Designation as an Eligible Telecommunications Carrier; Compliance Filing*

WUTC Docket No. UT-110423

Dear Mr. King,

On June 16, 2011, the Washington Utilities and Transportation Commission granted YourTel America, Inc. dba Washington Terracom ("YourTel") ETC status in the State of Washington via an Order effective that day. It included language that YourTel is to abide by the following:

*YourTel shall file with the Commission, by March 31 of each year, a report on the number of complaints, categorized by the different nature of complaints that it received from Washington Lifeline customers during the prior calendar year (e.g., billing disputes and service quality complaints). This report shall include complaints filed with YourTel, the Commission's Consumer Protection and Communications Section, the Washington State Office of the Attorney General, and the Federal Communications Commission (FCC).*

YourTel America hereby submits in compliance with the preceding Order its Report for year 2018.

Pursuant to WAC 480-07-160, YourTel respectfully requests that this filing be confidential. A redacted version has also been submitted for the public. YourTel takes measures to protect this information when it is made available to non-employees and employees alike, which is done only under limited circumstances. Specifically, making the number of enrolled and deactivated subscribers available to the public, would allow a competitor access to otherwise unavailable information to benchmark YourTel's internal operations against its own, and draw inferences about YourTel's operations and demand for its services. A competing firm would not be able to gain this information from any publicly available sources. Therefore, YourTel America, Inc. respectfully requests that the information contained within this filing be accorded confidential treatment and that the information contained herein only be disclosed to the appropriate reviewing staffs of the Commission.

Sincerely,

*/s/ Matt W. Dean*

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