



September 1, 2015

BY UTC WEB PORTAL

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: Docket UT-151584 – Replacement documents for
Petition to Receive Support –
CLAIM OF CONFIDENTIALITY

Pursuant to WAC 480-123-110, on behalf of Whidbey 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”) that replaces the petition previously submitted, together with original, unredacted versions of Exhibit 3, Exhibit 4 and Exhibit 7 which also replace exhibits previously submitted, together with an original, redacted version of the Petition and Exhibit 4.¹ In addition, an electronic copy, in .xlsx format, of the Excel workbook from which Exhibit 4 to the Petition was produced is being submitted via the Commission’s web portal, together with copies of this letter and all replacement exhibits, in both .pdf and .docx format .

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 versions of those documents

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).

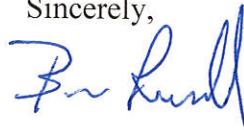
² Other persons (including entities) that might be directly affected by disclosure of the confidential information include each of the entities shown on Exhibit 1 to the above-mentioned Petition.

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accompany this letter, while redacted versions previously submitted remain valid. As specified in WAC 480-07-160(3)(b)(i), the original and copies (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.

If the Commission has any questions regarding the enclosed petition, please do not hesitate to contact me by e-mail at bruce.russell@whidbeytel.com or call me at (360) 321-0086.

Sincerely,



Bruce Russell
Chief Operating Officer

Accompanying Documents