

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive, SW
Olympia, WA 98504-7250

October 30, 2019

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*

Via Electronic Filing

WUTC Docket No. UT-110423

Dear Mr. Johnson,

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

On a quarterly basis beginning with the quarter ending on September 30, 2011, YourTel shall provide the number of Lifeline customers that it enrolls each month. YourTel shall also report the number of deactivated Lifeline customers each month by service plan and the reasons for deactivation (e.g., no usage for 60 consecutive days, annual verification unsuccessful, or voluntary exit). Quarterly reports shall be filed with the Commission no later than 30 days after the end of each quarter.

TerraCom hereby submits in compliance with the preceding their Third Quarter 2019 Report.

Pursuant to WAC 480-07-160, TerraCom respectfully requests that this filing be confidential. A redacted version has also been submitted for the public. TerraCom 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 TerraCom's internal operations against its own, and draw inferences about TerraCom'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. dba Washington TerraCom 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.

A redacted, public version of this report has also been electronically filed today.

Please let us know if there are any questions regarding this filing.

Sincerely,

/s/ Matt W. Dean

Matt W. Dean
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Regulatory Consultant to
YourTel America, Inc. dba Washington TerraCom