

March 23, 2020

**Via electronic filing**

Mark L. Johnson  
Secretary and Executive Director  
c/o Washington Utilities and Transportation Commission  
Records Department  
1300 S. Evergreen Park  
Drive S. W. Olympia, WA  
98504-7250

Received  
Records Management  
03/24/20 15:48  
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. Johnson,

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:

*By March 31 of each year, YourTel shall file with the Commission its complete Lifeline customer records of the prior calendar year. The customer records are subject to review of the Commission and DSHS. The records must have all the necessary information and be in an electronic format required by DSHS.*

YourTel America hereby submits in compliance with the preceding Order its Report for year 2019.

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*

Matt W. Dean  
405-755-8177 x2103  
[mdean@telecompliance.net](mailto:mdean@telecompliance.net)