



July 30, 2015

**BY ELECTRONIC FILING
VIA WUTC WEB PORTAL
AND FEDERAL EXPRESS**

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: 2015 Petition to Receive Support from the State
Universal Communications Services Program –
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”), together with an original of a redacted version of the Petition.¹ This filing is being made both on paper and electronically via the Commission’s web portal, and included with the web portal submission, in addition to a copy, in .pdf format, of each unique document comprising the paper filing, is an electronic copy, in .xlsx format, of each of the two Excel workbooks – the financial statement template and the statistics supplement - from which the unredacted version of Exhibit 4 to the Petition was produced. Also, included in the web portal submission are electronic copies, in .doc and/or .docx format, of the documents comprising the unredacted version of the Petition (including exhibits), other than those that have been generated from the referenced Excel files or are copies of documents provided by a third party.

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

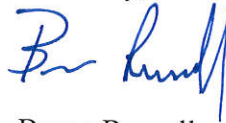
¹ Pursuant to agreement with Commission Staff, only one copy of the unredacted version of material being filed confidentially is provided, notwithstanding WAC 480-07-160(3)(c)(iii).

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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 and redacted versions of those documents accompany this letter. 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. In the paper version of the filing, the pages of the unredacted original that contain information claimed to be confidential have been printed on yellow paper, as required by WAC 480-07-160, and the unredacted original has been enclosed in a separate sealed envelope, marked “CONFIDENTIAL PER WAC 480-07-160.”

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

² Other persons (including entities) that might be directly affected by disclosure of the confidential information include each of the entities shown on Exhibit1 to the above-mentioned Petition.