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June 25, 2020

Mark Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Received
Records Management
06/26/20 11:33
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

RE: 2020 ETC Certification – Computer 5, Inc. d/b/a LocalTel Communications

Dear Mr. Johnson,

Enclosed please find a copy of Computer 5, Inc. d/b/a LocalTel Communications (“hereinafter referred to as LocalTel Communications”) Annual Eligible Telecommunications Carrier Report and Future Annual Plan (“Report”) filed pursuant to WAC 480-123-060, WAC480-123-070 and WAC 480-123-080, which has also been filed electronically.

A portion of LocalTel Communication’s Report contains certain confidential and proprietary information for which LocalTel Communications seeks confidential treatment pursuant to WAC 480-07-160 and RCW 80.04.095. Consistent with the Commission’s rules, LocalTel Communications has specifically designated the information that is confidential and provided both the complete responses and redacted version. Specifically, LocalTel Communications is claiming confidential treatment for portions of Confidential Exhibits B, & C. The unredacted confidential documents for Exhibits B & C are being filed electronically as Confidential and are marked “Confidential per WAC 480-07-160”.

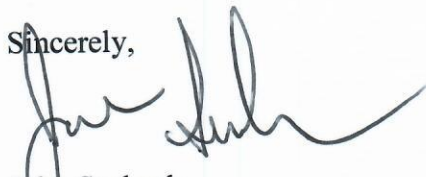
LocalTel Communications states as follows the legal basis under which the information is claimed to be confidential. Pursuant to WAC 480-07-160(2)(c) confidential treatment may be afforded to “valuable commercial information, including trade secrets... cost, or financial information, or customer-specific usage and network configuration and design information, as provided in RCW 80.04.095.” Confidential Exhibit B contains information about expenditures for the CAF II project for the Year 2019. Confidential Exhibit C contains detailed confidential information about LocalTel Communications planned CAF II network expansion and construction schedule in Washington as required by WAC 480-123-080.

LocalTel Communications believes that all these documents contain valuable proprietary information regarding LocalTel Communications telecommunications network in Washington, the public disclosure of which would cause serious competitive harm to the company.

Disclosure of these materials would reveal confidential details pertaining to LocalTel Communications network infrastructure, customer base, and the company's competitive position in the Washington telecommunications marketplace. Because this information goes to the heart of the company's business planning and competitive strategy, its public disclosure would be both economically damaging to LocalTel Communications and economically advantageous to its competitors. The company does not generally disclose publicly this type of information.

If there are any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "John Seabeck", written over a light blue horizontal line.

John Seabeck
Vice President
Computer 5 Inc. d/b/a LocalTel Communications