



September 15, 2006

**BY ELECTRONIC FILING
AND CERTIFIED MAIL,
RETURN RECEIPT REQUESTED**

Ms. Carole J. Washburn, Executive Secretary
Washington Utilities and Transportation Commission
P. O. Box 47250
1300 South Evergreen Park Drive, SW
Olympia, WA 98504-7250

Dear Ms. Washburn:

Re: Docket No. UT-061284 –
Staff Investigation of the Missoula Plan
WUTC Staff Data Requests for Group C Companies

CLAIM OF CONFIDENTIALITY

In response to the Washington Utilities and Transportation Commission (“Commission”) Staff Data Requests for Group C Companies in the above-referenced docket that accompanied a letter, dated August 25, 2006, from Mr. Wilford Saunders, Assistant Director of the Commission Staff addressed to Incumbent Local Exchange Carriers – (ILECs) – Group C Wireline Regulated Companies in the State of Washington, enclosed are the responses of Whidbey Telephone Company’s (“Company”) to those Data Requests.¹

Because of the CONFIDENTIAL nature of the information set forth in portions of the enclosed Data Request responses, 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 Data Request responses contain valuable commercial information, including confidential marketing and financial information. Accordingly, in compliance with WAC 480-07-160(3)(c), unredacted and redacted versions of those documents are enclosed. As specified in WAC 480-07-160(3)(b)(i), all copies (both redacted and unredacted) of materials claimed to be confidential have been marked “CONFIDENTIAL PER WAC 480-07-160.” The redacted versions have been marked “REDACTED.” The unredacted versions have been marked “UNREDACTED,” the information thereon that is claimed to be confidential has been marked by contrasting highlighter, they have been

¹ While the WUTC Staff Data Requests are titled as “Data Requests,” the Company understands them to be informal Staff information requests, rather than more formal data requests as contemplated by WAC 480-07-400.

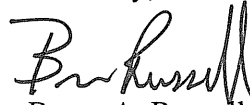
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printed on yellow paper, and they are enclosed in a separate sealed envelope, also marked
"CONFIDENTIAL PER WAC 480-07-160."

If the Commission has any questions regarding the enclosed materials, please let us know.

Sincerely,



Bruce A. Russell
Chief Financial Officer

Enclosures