



Local Voice Services – High Speed Internet
Long Distance – Security & Alarms – WhidbeyTV

June 17, 2019

BY WASHINGTON UTC WEB PORTAL

Mr. Mark L. Johnson
Executive Director and Secretary
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive SW
P. O. Box 47250
Olympia, WA 98504-7250

Dear Mr. Johnson:

Re: WUTC Docket No. UT-190004 –
Whidbey Telephone Company –
Access Recovery Charges and Connect America Fund –
CONFIDENTIAL TREATMENT REQUESTED

On behalf of Whidbey Telephone Company (“Company”), accompanying this letter for filing with the Washington Utilities and Transportation Commission (“Commission” or “WUTC”) is a copy of data pertaining to the Company that the National Exchange Carrier Association, Inc. (“NECA”) has indicated have been provided by NECA to the Federal Communications Commission (“FCC”) and the Universal Service Administrative Company (“USAC”) concurrent with NECA’s 2019 Annual Tariff Filing. It is the Company’s understanding that these data were filed by NECA, on the Company’s behalf, with the FCC and USAC pursuant to Section 54.304(d)(1) of the FCC’s rules and regulations, 47 C.F.R. § 54.304(d)(1), as establishing the Company’s projected eligibility for CAF ICC funding during the upcoming funding period pursuant to Section 51.917 of the FCC’s rules and regulations, 47 C.F.R. §51.917, including any true-ups, pursuant to said Section 51.917, associated with an earlier funding period.

Because of the CONFIDENTIAL nature of the information set forth in portions of the accompanying document, 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 document contains valuable commercial information, including confidential marketing, cost and financial information. Accordingly, as contemplated by WAC 480-07-160(5)(c), unredacted and redacted versions of that document accompany

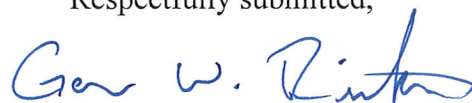
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this letter. As specified in WAC 480-07-160(5)(c)(i), both copies (unredacted and redacted) of the accompanying document have been marked "Shaded information is designated as confidential per WAC 480-07-160." The redacted version has been marked "REDACTED."

Please let us know if the Commission has any questions regarding the accompanying document or the information it presents.

Respectfully submitted,



Gary W. Ricketts
Secretary-Treasurer

Accompanying Document
(Unredacted and Redacted Versions)