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UT-240492

June 24, 2024

Received  
Records Management  
Jun 25, 2024

Mr. Jeff Killip  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

**RE: 2024 ETC Certification – Computer 5, Inc. d/b/a LocalTel Communications**

Dear Mr. Killip

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, D & E. The unredacted confidential documents for Exhibits B, C, D & E 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 and Confidential Exhibit C contains information about expenditures for the RDOF project for the Year 2023. Confidential Exhibit D contains detailed confidential information about LocalTel Communications planned CAF II network expansion and construction schedule in Washington as required by WAC 480-123-080. Confidential Exhibit E contains detailed confidential information about LocalTel Communications planned RDOF network expansion and construction schedule in Washington as required by WAC 480-123-080.

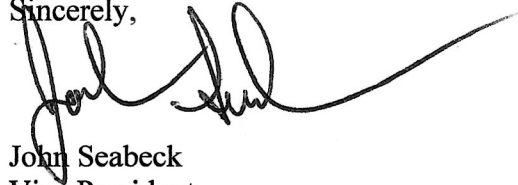
LocalTel Communications believes that all these documents contain valuable proprietary information regarding LocalTel Communications telecommunications network in Washington, the public disclosure of which would cause serious competitive harm to the company.

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.

Pursuant to WAC 480-123-060 LocalTel Communications requests that the Washington Utilities and Transportation Commission certify to the Federal Communications Commission and the Universal Service Administrative Company that LocalTel Communications has met the requirements for eligibility for continued receipt of federal high-cost funds.

If you should have any questions or need further explanation, please contact me at (509)-888-9121.

Sincerely,

A handwritten signature in black ink, appearing to read "John Seabeck", with a long, sweeping horizontal line extending to the right.

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