



June 16, 2021

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

**BY ELECTRONIC FILING
VIA UTC WEB PORTAL**

Mr. Mark L. Johnson, Executive Director and Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
621 Woodland Square Loop SE
Lacey, WA 98503

Dear Mr. Johnson:

Re: WUTC Docket No. UT-210003 –
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 2021 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 some of the information contained in the enclosed Annual Report, pursuant to RCW 80.04.095 and WAC 480-07-160 the Company hereby asserts a claim of confidentiality with respect to the Annual Report, and the information therein designated as confidential. The basis for this claim is that the Annual Report contains valuable commercial information, including confidential marketing, cost and financial information. Accordingly, in compliance with WAC 480-07-160(5)(c), unredacted and redacted versions of the Annual Report accompany this letter. Consistent with WAC 480-07-160(5)(b)(i), the unredacted version claimed to be confidential has been marked “Shaded information is designated as confidential per WAC 480-07-160” and highlighted in yellow. The redacted version has been marked “REDACTED

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Mr. Mark L. Johnson
Washington Utilities and
Transportation Commission
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Please let us know if the Commission has any questions regarding the accompanying document or the information it presents.

Sincerely,

A handwritten signature in blue ink that reads "Gary W. Ricketts".

Gary W. Ricketts
Secretary & Treasurer
Whidbey Telephone Company