

Law Office of
Richard A. Finnigan
2112 Black Lake Blvd. SW
Olympia, Washington 98512
Fax (360) 753-6862

Richard A. Finnigan
(360) 956-7001
rickfinn@localaccess.com

Kathy McCrary, Paralegal
(360) 753-7012
kathym@localaccess.com

September 27, 2006

VIA E-MAIL AND HAND DELIVERY

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

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

CLAIM OF CONFIDENTIALITY

Dear Ms. Washburn:

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 the following companies to those data requests: Asotin Telephone Company, d/b/a TDS Telecom, Ellensburg Telephone Company, Hood Canal Telephone Company, Inland Telephone Company, Kalama Telephone Company, Lewis River Telephone Company, d/b/a TDS Telecom, Mashell Telecom, Inc., McDaniel Telephone Company, d/b/a TDS Telecom, Pend Oreille Telephone Company, Pioneer Telephone Company, St. John Co-operative Telephone and Telegraph Company, Tenino Telephone Company, The Toledo Telephone Co., Inc. and YCOM Networks, Inc. (“Companies”).¹

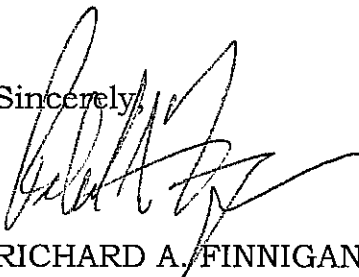
¹ While the WUTC Staff Data Requests are titled as “Data Requests,” the Companies understand them to be informal Staff information requests, rather than more formal data requests as contemplated by WAC 480-07-400.

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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 Companies hereby assert 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 480-070-160." 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 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,



RICHARD A. FINNIGAN

RAF/km
Enclosures

cc: Clients