



July 30, 2009

**BY ELECTRONIC FILING  
VIA WUTC WEB PORTAL**

Mr. David W. Danner, Secretary & Executive Director  
Washington Utilities and Transportation Commission  
P. O. Box 47250  
1300 South Evergreen Park Drive, SW  
Olympia, WA 98504-7250

Dear Mr. Danner:

Re: 2009 ETC Certification –  
Request for Certification Pursuant to  
WAC 480-123-060 and 47 C.F.R. § 54.314

**CLAIM OF CONFIDENTIALITY**

Pursuant to WAC 480-123-060, Whidbey Telephone Company (“Company”) hereby requests that the Washington Utilities and Transportation Commission (“Commission”) certify to the Federal Communications Commission and the Universal Service Administrative Company that the Company has met the requirements of 47 C.F.R. § 54.314 for eligibility for continued receipt of federal high-cost funds.

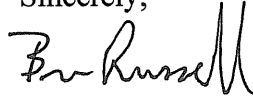
The certifications and reports (“Reports”) that are specified in WAC 480-123-060, WAC 480-123-070 and WAC 480-123-080 accompany this letter of transmittal.

Because of the CONFIDENTIAL nature of the information set forth in portions of the accompanying Reports, including the attachments thereto, 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 Reports and their attachments contain valuable commercial information, including confidential marketing, cost 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,” and the information thereon that is claimed to be confidential has been marked by contrasting highlighter.

Mr. David W. Danner, Secretary & Executive Director  
Washington Utilities and Transportation Commission  
July 30, 2009  
Page 2

If the Commission has any questions regarding the enclosed materials, please do not hesitate to call me at 360/321-0086.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Russell". The signature is fluid and cursive, with the first name "Bruce" and last name "Russell" clearly distinguishable.

Bruce A. Russell  
Chief Operating Officer