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November 9, 2015

VIA E-FILING

Mr. Steven V. King, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, WA 98504-7250

Re: Ellensburg Telephone Company - Docket UT-151600

Dear Mr. King,

Attached for filing in the above referenced docket is a PowerPoint presentation by Mr. Morse on behalf of Ellensburg Telephone Company. This PowerPoint presentation will be the basis for Mr. Morse's discussion with the Commissioners in this Docket at the Open Meeting of November 13, 2015.

Mr. Morse's presentation points out that in today's market, a traditional rate-of-return analysis does not tell the whole story, particularly for a company that is a price-cap company at the federal level. Mr. Morse's presentation discusses the investments needed for replacement of capital expenditures and other factors that should be taken into account.

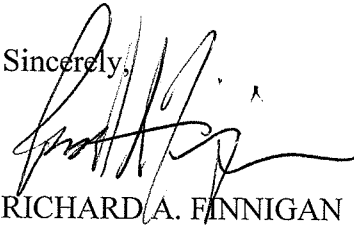
As noted in the Commission Staff's memorandum in this Docket, under WAC 480-123-120(1) rate-of-return is one factor to determine eligibility. However, it should not be a factor that diminishes the consideration of other factors. Although Commission Staff indicates that they have reviewed other factors, the rate-of-return still appears to be the primary factor.

Ellensburg is engaged in a transition to broadband service as evidenced by the receipt of the CAF support discussed in Staff's memorandum and in Mr. Morse's presentation. That should be a factor that is given substantial consideration.

Steven King
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Thank you for your attention to this matter. If you have any questions about this matter prior to the Open Meeting, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard A. Finnigan', written in a cursive style.

RICHARD A. FINNIGAN

RAF/cs
Enclosure

cc: Client (via e-mail)
Bill Weinman (via e-mail)
Roger Hahn (via e-mail)