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IDAHO PUBLIC  
UTILITIES COMMISSION

October 9, 2014

**Via Hand Delivery**

Ms. Jean Jewell  
Idaho Public Utilities Commission  
P O Box 83720  
Boise, ID 83720-0074

ALB-T-14-02

Re: Use of Deposit Refunds to Assist Low-Income Customers


Dear Ms. Jewell:

I represent Albion Telephone Company, doing business as ATC Communications ("ATC"). ATC routinely issues deposit refunds to its customers. At times, ATC is unable to locate the customer, and thus some of the deposits may be classified as abandoned or unclaimed. At the current time, ATC has approximately \$2,000 in unclaimed deposits which ATC has held for more than five (5) years, which deposits are therefore presumed abandoned. Pursuant to the Idaho Administrative Code, ATC is permitted to apply to the Idaho Public Utilities Commission for permission to deposit such abandoned sums into a financial assistance program to assist ATC's low income and disadvantaged customers with the payment of their bills. (IDAPA 31.41.01.108.02) ATC has recently created such a program to assist ATC's lifeline customers with payment of those fees not covered by Lifeline assistance, namely with the payment of the initial connection fees. The intent of this letter is to formally ask the Commission for approval to use the unclaimed deposits for the purposes for which the fund was established.

The Administrative Code further provides that even if such funds are deposited into such an account, ATC must still comply with the reporting requirements for abandoned property set forth in Idaho Code § 14-517. Because the individual deposits are less than \$50, under the Idaho Code, they are not considered "abandoned" for purposes of the Unclaimed Property Law. Thus, no report to the State of Idaho is required. However, ATC will retain the records of ownership as to those deposits as required by Idaho Code.

If you have any questions or require further information, please contact me at (208) 577-5747 or by e-mail at [cam@camlawidaho.com](mailto:cam@camlawidaho.com).

Sincerely,

  
Cynthia A. Melillo

Cc: Grace Seaman (via electronic mail)