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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.

Sincerely,


Cynthia A. Melillo

Cc: Grace Seaman (via electronic mail)

**CONSENT RESOLUTION
OF
ALBION TELEPHONE COMPANY**

The undersigned, constituting all of the directors of Albion Telephone Company, an Idaho corporation (the "Corporation"), do hereby take the following corporate action in accordance with the general corporate laws of the state of Idaho and the constituent documents of the Corporation:

WHEREAS, the purposes for which the Corporation was organized include operating telephone lines and telephone stations, and to engage in any activity necessary or convenient to operating such business;

WHEREAS, the undersigned Directors desire to create a financial assistance fund to be used to assist the Corporation's low-income customers, which fund is considered necessary and convenient in the operation of the business of the Corporation;

WHEREAS, such financial assistance fund shall be used to assist the Corporation's Lifeline customers with those costs not covered by Lifeline assistance (such as payment of connection or installation costs) or in paying all or some of a customer's monthly recurring charges upon a showing of financial hardship or as otherwise determined by the Board of Directors from time to time;

WHEREAS, in connection with the operation of the Corporation's business, the Corporation accepts deposits and other funds from customers;

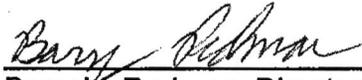
WHEREAS, at times, when the Corporation attempts to refund such deposits or other funds, the Corporation is unable to locate the customer, and thus some of the deposits may be classified as abandoned or unclaimed property under Idaho law;

WHEREAS, the undersigned Directors desire to use the abandoned or unclaimed deposits to fund the financial assistance program.

NOW, THEREFORE, BE IT RESOLVED that the Corporation take whatever actions it deems necessary to create the financial assistance fund, including the opening of an account and the creation of any guidelines for distributions from the fund. The funds shall be distributed on a first come-first serve basis and as long as there are funds available. Customers will be eligible to receive such funds upon providing proof that they have been approved for the lifeline program by the State of Idaho.

BE IT FURTHER RESOLVED that the Corporation apply to the Idaho Public Utilities Commission from time to time for permission to use any abandoned or unclaimed deposits for the purposes of the financial assistance fund.

IN WITNESS WHEREOF, the undersigned have authorized the foregoing action effective as of the 30 day of September 2014.



Barry V. Redman, Director



Richard L. Redman, Director



Darla D. Redman, Director



Nicole Allphin, Director



Jennifer Bradshaw, Director



Kyle Redman, Director