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Sent: Thursday, August 4, 2022 12:50 PM

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Subject: RE: Proposed Income Tax Rule 003.02 [IWOV-IMANAGE.FID1300298]

Thanks, Phil.

We are happy to provide feedback and can start that process now. We believe that it is not at all timely to start this discussion, late in a rulemaking process that has been focused on other issues, and when we had the expectation, going back at least to our email exchange of March 29, that the cost of performance rules would not change. In fact, if that had been a risk, the Idaho Bankers Association would have pushed for wording in the bill similar to the provisions included for communications companies, specifically preserving the cost of performance standard. On behalf of the IBA, we request that the wording of section 003.02 be returned to the version circulated on July 14.

Please let me know if you have any questions regarding this issue.

Thanks, Rick