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JAN 17 2013

Ravalli County Commissioners

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Ravalli County Assessor



Property Tax Department
 PO Box 635
 Basking Ridge, NJ 07920

CC
Deb Reesman
+ Marie Keeto

1/2/13

RE: Payment of Under Protest of Portion of 2012 Property Tax
 of Gold Creek Cellular d/b/a Verizon Wireless

Dear County Assessor:

Gold Creek Cellular d/b/a Verizon Wireless ("VERIZON WIRELESS") submitted a check representing payment of protested and unprotested amounts for the first half of 2012 assessed property taxes.

VERIZON WIRELESS disagrees with and intends to appeal to the State Tax Appeals Board within the time provided by statute the assessed value of \$285,855,686 on VERIZON WIRELESS's property as determined by the Department in its revised valuation dated May 25, 2012. VERIZON WIRELESS believes that the value of its taxable property is \$89,137,975. VERIZON WIRELESS therefore protests \$196,717,976 of the assessed value. Consequently, VERIZON WIRELESS protests 68.82% of the taxes assessed.

As required by Mont. Code Ann. 15-1-402, the basis for the protest is summarized as follows:

1. The Department has failed to assess the taxpayer's property at fair market value since the Department used the wrong methodology to determine the cost of the subject property. VERIZON WIRELESS believes the correct methodology is Replacement Cost New Less Depreciation (RCNLD). Instead, the Department used a trended original cost method, which overstates fair market value for this taxpayer.

For the above reason and the reasons which will be more fully set forth in the hearing before the State Tax Appeals Board, the taxpayer believes the valuation and of its property subject to property tax in Montana is erroneous and thus payment of the first half taxes is made under protest.

VERIZON WIRELESS submitted a check in the amount of \$128,307.75. Of this amount, VERIZON WIRELESS is paying \$40,009.99 without contest and is paying the amount of \$88,297.76 under protest as provided by Montana Code Annotated 15-1-402.

Please contact the undersigned if you have any questions.

Very truly yours,



Torie Jackson
Property Tax Sr. Analyst
(908) 559-4461
