

**State of New Hampshire
Before the New Hampshire Public Utilities Commission**

DRM 07-119

**Proposed Rulemaking (Puc 1300/Utility Pole Attachments) – Interim Rules
and**

DRM 08-004

Proposed Rulemaking (Puc 1300/Utility Pole Attachments) – Regular Rules

**JOINT PETITION FOR INTERVENTION OF EIGHT MEMBERS
OF THE NEW HAMPSHIRE TELEPHONE ASSOCIATION**

February 20, 2008

Submitted on behalf of:

**BRETTON WOODS TELEPHONE COMPANY, INC.
DIXVILLE TELEPHONE COMPANY
DUNBARTON TELEPHONE COMPANY, INC.
GRANITE STATE TELEPHONE, INC.
TDS TELECOM/HOLLIS TELEPHONE COMPANY, INC.
TDS TELECOM/KEARSARGE TELEPHONE COMPANY
TDS TELECOM/MERRIMACK COUNTY TELEPHONE
TDS TELECOM/WILTON TELEPHONE COMPANY, INC.**

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**JOINT PETITION FOR INTERVENTION OF EIGHT MEMBERS
OF THE NEW HAMPSHIRE TELEPHONE ASSOCIATION**

Eight independent New Hampshire incumbent local exchange carriers who are members of the New Hampshire Telephone Association (the "Eight NHTA ILECs"),¹ by and through the undersigned counsel and pursuant to RSA 541-A:32 and N.H. Admin. Rule Puc 203.17, hereby petition the New Hampshire Public Utilities Commission ("NHPUC") to grant intervention to the Eight NHTA ILECs in the present proceedings.

In support of their Joint Petition, the Eight NHTA ILECs state as follows:

1. On November 8, 2007, the Commission opened Docket No. DRM 07-119 for the purpose of promulgating interim rules governing Utility Pole Attachments, as required by 2007 N.H. Laws 340:1 (codified at RSA 374:34-a; eff. July 16, 2007).

¹ The NHTA ILECs are: Bretton Woods Telephone Company, Inc.; Dixville Telephone Company; Dunbarton Telephone Company, Inc.; Granite State Telephone, Inc.; TDS Telecom/Hollis Telephone Company, Inc.; TDS Telecom/Kearsarge Telephone Company; TDS Telecom/Merrimack County Telephone Company; and TDS Telecom/Wilton Telephone Company, Inc.

2. On November 28, 2007, the Commission submitted a request for a waiver of RSA 541-A:40 to the Joint Legislative Committee on Administrative Rules ("JLCAR") for the purpose of allowing prompt adoption of Interim Rule Puc 1300.

3. Following JLCAR's approval of the Commission's request for a waiver, the Commission, on January 11, 2008, adopted Interim Rule Puc 1300.

4. By Secretarial Letter dated January 18, 2008, the NHPUC announced its adoption of an Interim Rule (Puc 1300) and opened Docket No. DRM 08-004 for the purpose of considering and adopting a Regular Rule (Rule 1300), governing Utility Pole Attachments.

5. In its "Request for Advance Public Comment on Subject Matter of Possible Rulemaking," the Commission stated that the Regular Rule, when proposed and adopted, would affect "[p]ublic utilities that own or co-own utility poles; persons with facilities attached to such poles; and persons seeking such attachments."

6. The Eight NHTA ILECs are all New Hampshire public utilities under RSA 362:2, I and operate as incumbent local exchange carriers, as defined in Puc 402.23, subject to the jurisdiction of the NHPUC under RSA 374:3.

7. The Eight NHTA ILECs all either own or co-own utility poles (as that term is defined in RSA 374:34-a, I), presently have facilities attached to such poles, and/or seek, both presently and in the future, to make attachments to such poles.

8. The Eight NHTA ILECs have rights, duties, privileges, immunities or other substantial interests that may be affected by the present proceedings.

9. The interests of justice and the orderly and prompt conduct of the present proceedings will not be impaired by allowing the intervention of the Eight NHTA ILECs.

10. Based on the foregoing, the Eight NHTA ILECs assert that they satisfy the requirements for intervention under RSA 541-A:32.


WHEREFORE, the Eight NHTA ILECs ask the NHPUC to grant their Joint Petition for Intervention in these proceedings.

DATED at Plymouth, New Hampshire, this 20th day of February, 2008.

Respectfully submitted,

BRETTON WOODS TELEPHONE COMPANY, INC.; DIXVILLE
TELEPHONE COMPANY; DUNBARTON TELEPHONE COMPANY, INC.;
GRANITE STATE TELEPHONE, INC.; TDS TELECOM/HOLLIS
TELEPHONE COMPANY, INC.; TDS TELECOM/KEARSARGE
TELEPHONE COMPANY; TDS TELECOM/ MERRIMACK COUNTY
TELEPHONE COMPANY; and TDS TELECOM/WILTON TELEPHONE
COMPANY, INC.

By: PRIMMER PIPER EGGLESTON & CRAMER PC

By: 

Paul J. Phillips, Esq.

Joslyn L. Wilschek, Esq.

Primmer Piper Eggleston & Cramer PC

100 East State Street, P.O. Box 1309

Montpelier, VT 05601-1309

Tel: (802) 223-2102

E-mail: pphillips@ppeclaw.com

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ENTRY OF APPEARANCE

Primmer Piper Eggleston & Cramer PC, by and through Paul J. Phillips, Esq., and Joslyn L. Wilschek, Esq., and in accordance with N.H. Admin. Rule Puc 203.16(a)(2), hereby enters its appearance in the above-referenced proposed rulemaking proceedings on behalf of eight (8) New Hampshire incumbent local exchange carriers who are members of the New Hampshire Telephone Association (the "Eight NHTA ILECs"), viz.:

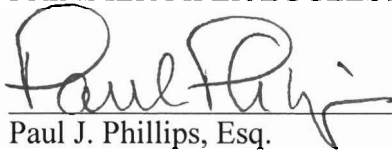
Bretton Woods Telephone Company, Inc.;
Dixville Telephone Company;
Dunbarton Telephone Company, Inc.;
Granite State Telephone, Inc.;
TDS Telecom/Hollis Telephone Company, Inc.;
TDS Telecom/Kearsarge Telephone Company;
TDS Telecom/ Merrimack County Telephone Company; and
TDS Telecom/Wilton Telephone Company, Inc.

DATED at Plymouth, New Hampshire, this 20th day of February, 2008.

Respectfully submitted,

PRIMMER PIPER EGGLESTON & CRAMER PC

By:



Paul J. Phillips, Esq.

Joslyn L. Wilschek, Esq.

Primmer Piper Eggleston & Cramer PC

100 East State Street, P.O.Box 1309

Montpelier, VT 05601-1309

Tel: (802) 223-2102

E-mail: pPhillips@ppeclaw.com