

**BEFORE THE
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION**

In the Matter of the Petition of)	
)	
Of iNetworks Group, Inc. for Amendment)	
Of Authorization No. C02-001-09 to)	Docket No. _____
Explicitly Establish Petitioner's)	
New Hampshire Local Exchange Service)	
Operating Territory as that of FairPoint)	
Communications, Inc.)	
_____)	

PETITION

iNetworks Group, Inc. (“iNetworks” or “Petitioner”), pursuant to New Hampshire Code of Administrative Rules Puc 202.1(a), and 203.02 through 203.5, hereby petitions the New Hampshire Public Utilities Commission (“Commission”) for amendment of Petitioner’s local exchange operating authority in the State of New Hampshire. Specifically, Petitioner seeks an amendment of its New Hampshire local exchange operating authority to reflect that Petitioner’s New Hampshire local exchange service territory is limited to, and mirrors, the current FairPoint Communications, Inc. local exchange operating territory.

Although Petitioner has been granted what could be understood as statewide operating authority for its local exchange and interexchange operations in New Hampshire, it has come to Petitioner’s attention that its authority has raised concerns regarding Petitioner’s prospective competitive local exchange carrier operations in the operating territories of rural incumbent local exchange carriers (“RLEC”)¹ subject to the federal rural exemption clauses in section 251(f) of the Telecommunications Act of 1996, as amended,² and Commission rules.³

¹ See e.g. *The Rural Telephone Companies Petition for the Recession of CLEC Registration Within Their Exchanges*, Docket No. DT-10-183 (July 13, 2010). Petitioner notes that it has no record of service of the Rural Telephone Companies service of their Petition or the Commission’s August 5, 2010 *Order of Notice* in DT-10-183.

² 47 U.S.C. §251(f), Exemptions, suspensions, and modifications.

³ Puc 431.01

Petitioner does not now, nor has it had plans to pursue operations in RLEC service territories in New Hampshire. In an effort to allay RLEC concerns, Petitioner respectfully requests that the Commission establish iNetwork's New Hampshire local exchange operating territory with specificity as the FairPoint Communications, Inc. local exchange operating territory. In support of its request, Petitioner states as follows.

I. Identification of Petitioner and Communications Regarding this Matter.

Petitioner is iNetworks Group, Inc. Petitioner's contact for purposes of communications regarding this matter is:

Raymond Cowley
Sr. Vice President and General Manager
iNetworks Group, Inc.
125 S. Wacker Drive - Suite 2510
Chicago, IL 60606
Telephone: 312.212.0825
Facsimile: 312.264.0467
Email: rcowley [at] ingts [dot] com

Communications regarding this matter should also be addressed to Petitioner's regulatory consultants:

Andrew O. Isar
Miller Isar, Inc.
4423 Point Fosdick Drive, NW
Suite 306
Gig Harbor, WA 98335
Telephone: 253.851.6700
Facsimile: 866.474.3630
Email: aisar [at] millerisar [dot] com

II. Statement of Facts.

On January 30, 2009 Petitioner applied to the Commission for registration as a competitive local exchange carrier and separately as an interexchange carrier. On February 27, 2009, Petitioner was granted *Authorization to Provide Local Exchange Service* under

authorization No. C02-001-09 and separately, *Authorization to Provide IntraLATA Toll Service* under Authorization No. IXC 02-001-09 (jointly, the “Authorizations”).⁴ With respect to Petitioner’s local exchange service Authorization, Petitioner was granted authority “to provide local exchange service in the State of New Hampshire.”

On July 13, 2010, Granite State Telephone, Inc. ("GST"), Dunbarton Telephone Company, Inc. ("DTC"), Bretton Woods Telephone Company, Inc. ("BWT") and Dixville Telephone Company ("Dixville"), rural incumbent local exchange carriers (the "RLECs"), petitioned the Commission:

for a determination that any Form CLEC 10 registrations purporting to authorize competitive local exchange carriers ("CLECs") to engage in business as telephone utilities within the service territories of the RLECs be declared null and void or, in that such registration be rescinded [*inter alia*] due to: ...the mistake of fact and law involved in the Commission (or its staff) utilizing Puc 431.01 and its Chapter 431 process, as said rule and Chapter only authorizes issuances of registrations in areas served by non-exempt ILECs, not the areas served by the RLECs (which are not served by non-exempt ILECs);

Though Petitioner takes no position with regard to the merits of RLEC’s Petition, in an effort to allay RLEC concerns regarding to iNetworks operating territory, while obviating the need to take the extreme position of nullification of iNetworks local Authorization altogether as proposed by the RLECs, iNetworks hereby respectfully requests that the Commission amend Petitioner’s Authorization to explicitly establish Petitioner’s local exchange operating territory as that of FairPoint Communications, Inc.

III. Amendment of Petitioner’s Local Exchange Operating Authority.

Petitioner respectfully requests that its local exchange authority be amended to reflect that Petitioner’s New Hampshire local exchange operating authority is limited to, and mirrors,

⁴ Authorizations were granted to “iNetworks, Inc.” On April 7, 2010, Petitioner was advised that the Authorizations had been amended at Petitioner’s request to reflect Petitioner’s correct legal name, “iNetworks Group, Inc.” consistent with Petitioner’s original applications for registration.

the current FairPoint Communications, Inc. local exchange operating territory. FairPoint Communications, Inc.'s local exchange service territory as set forth pursuant to Section 5.1.6., Localities and Exchanges of Connection, of Verizon New England, Inc.'s Exchange and Network Services Tariff NHPUC No. 83,⁵ Part A, Section 5, Page 3, *et seq.*, which is a matter of record with the Commission.

This requested amendment is limited to the specific identification of Petitioner's local exchange service territory. As Petitioner will not provide local exchange service outside of the FairPoint Communications, Inc. local exchange service territory, Petitioner's request for amendment is based exclusively on Petitioner's desire to allay RLEC concerns arising from the interpretation that Petitioner may operate in RLEC territory in violation of the federal statutory and state regulatory exemptions, while obviating the need, cost, and delay associated with withdrawing and re-filing the Company's *CLEC Application for Registration*. Otherwise, there is no change in Petitioner's local exchange operations as set forth in its original *CLEC Application for Registration*.

IV. Conclusion

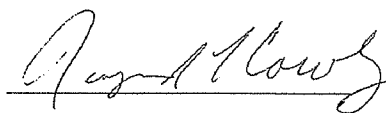
WHEREFORE, Petitioner iNetworks Group, Inc. respectfully requests that its local exchange authority be amended to explicitly establish that Petitioner's local exchange operating authority is limited to, and mirrors, the current FairPoint Communications, Inc. local exchange operating territory in New Hampshire.

[Signature on following page.]

⁵ As adopted by FairPoint Communications, Inc.

Respectfully submitted this 13th day of September, 2010,

iNetworks Group, Inc.

By 

Raymond Cowley
Sr. Vice President and General Manager
125 S. Wacker Drive - Suite 2510
Chicago, IL 60606
Telephone: 312.212.0825

Andrew O. Isar
Miller Isar, Inc.
4423 Point Fosdick Drive, NW
Suite 306
Gig Harbor, WA 98335
Telephone: 253.851.6700

Regulatory Consultants to
iNetworks Group, Inc.