

THE STATE OF NEW HAMPSHIRE

BEFORE THE

PUBLIC UTILITIES COMMISSION

DT 11-061

**NORTHERN NEW ENGLAND TELEPHONE OPERATIONS LLC
d/b/a FAIRPOINT COMMUNICATIONS NNE**

Performance Assurance Plan and Carrier to Carrier Metrics

PETITION TO INTERVENE

NOW COMES Comcast Phone of New Hampshire, LLC (“Comcast Phone”), by and through its undersigned attorneys, and, pursuant to RSA 541-A:32, I (b) and N.H. Admin. Rule Puc 203.17, respectfully requests that it be permitted to intervene in the above-captioned matter. In support of this Petition, Comcast Phone states as follows:

1. Comcast Phone is a competitive local exchange carrier (“CLEC”) doing business in New Hampshire and is a wholesale customer of FairPoint Communications NNE (“FairPoint”).
2. FairPoint has wholesale service responsibilities and other obligations to CLECs pursuant to carrier to carrier guidelines (“C2C”) and a performance assurance plan (“PAP”) adopted by FairPoint when it purchased Verizon’s New Hampshire assets. FairPoint has additional wholesale responsibilities imposed by Order No. 24,823 issued on February 25, 2008 (“2008 Approval Order”) in DT 07-011, a docket in which Comcast Phone participated as an intervenor jointly with New England Cable and Telecommunications Association (“NECTA”).

3. In the instant docket, FairPoint has submitted a petition for approval of a simplified metrics plan and wholesale performance plan to replace its existing C2C and PAP.

4. The approvals that FairPoint is seeking in this docket may impact FairPoint's obligations to Comcast Phone and other CLECs and may affect the quality of service provided by FairPoint to Comcast Phone. Thus, Comcast Phone's rights, privileges and substantial interests may be affected by this proceeding.

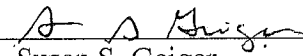
5. In view of the foregoing, and because this Petition is filed within the time period prescribed by the Commission's Order of Notice dated July 28, 2011, Comcast Phone qualifies for intervention under RSA 541-A:32, I.

WHEREFORE, Comcast Phone respectfully requests that it be permitted to intervene in this proceeding.

Respectfully submitted,

Comcast Phone of New Hampshire,
LLC

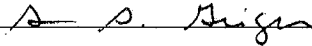
By its attorneys,
ORR & RENO, P.A.

By: 
Susan S. Geiger
One Eagle Square
Concord, NH 03301
603-223-9154
sgeiger@orr-reno.com

Dated: August 3, 2011

Certificate of Service

I hereby certify that a copy of the foregoing Petition has on this 3rd day of August, 2011 been sent by electronic mail to the Service List.

_____

Susan S. Geiger

787999_1.DOC