

**STATE OF NEW HAMPSHIRE**  
**Before the**  
**PUBLIC UTILITIES COMMISSION**

Petition of FairPoint Communications for Approval of Simplified Metrics Plan and Wholesale Performance Plan
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DT 11-061

**SOVERNET'S PETITION TO INTERVENE**

National Mobile Communications Corp., d/b/a Sovernet Communications, ("Sovernet") petitions to intervene in this proceeding pursuant to NH Code of Administrative Rules, PUC 203.17.

Sovernet is a competitive local exchange carrier ("CLEC") duly authorized to provide such services in New Hampshire.

Sovernet depends on FairPoint to provide a number of wholesale services to Sovernet in order to serve its customers. In the event that FairPoint's provision of these services falls below standards established in the Performance Assurance Plan ("PAP"), Sovernet is entitled to receive penalty payments in the form of bill credits under the terms of the PAP. The PAP serves as incentive mechanism to track whether and ensure that FairPoint provides adequate and non-discriminatory wholesale service to Sovernet and other CLECs.

In its Petition, FairPoint has requested that the Commission approve "Simplified Metric Plan" to replace the current PAP. Any change in the requirements of a new PAP approved by the Commission could affect the quality of services provided by FairPoint to Sovernet, and by extension, the quality of services Sovernet is able to provide to its own customers. Therefore, Sovernet' rights, duties, privileges, immunities or other substantial interests may be affected by

this proceeding.

The interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing Sovernet to intervene. The Commission has just issued its Order of Notice, and Sovernet is filing this petition in accordance with the schedule that the Commission established in the July 28, 2011 Order of Notice,

For these reasons, Sovernet requests that it be permitted to intervene.

Dated August 2, 2011

Respectfully Submitted,

  
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