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David Berndt

May 19, 2005

SENT ELECTRONICALLY AND BY U.S. MAIL

Ms. Debra A. Howland
Executive Director and Secretary
New Hampshire Public Utilities Commission
21 S. Fruit Street, Ste. 10
Concord, NH 03301-2429

Re: NH PUC Docket DT 05-083

Dear Ms. Howland:

On behalf of both CTC Communications and Lightship Telecom, I am filing this cover letter and 8 copies, along with a receipt copy, of our attached Motion to Intervene in the above-referenced matter.

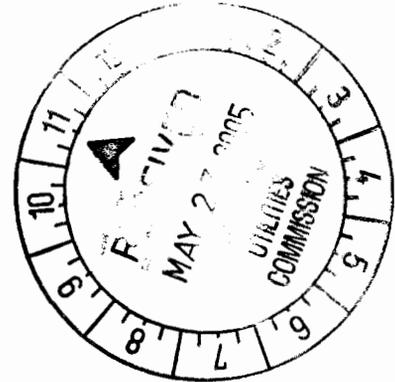
Please acknowledge receipt of this letter and its enclosure by signing or stamping and dating the receipt copy of this letter.

Sincerely,

David Berndt

CC: NH Consumer Advocate Office
Verizon New Hampshire
CTC Communications

Enclosures



**STATE OF NEW HAMPSHIRE
PUBLIC UTILITY COMMISSION**

In Re: Formal Investigation in Connection)
With Certain Provisions of Verizon Tariff)
No. NHPUC 84) Docket No. DT 05-083

**MOTION FOR LEAVE TO INTERVENE
OF CTC COMMUNICATIONS CORP. and LIGHTSHIP TELECOM, LLC**

CTC Communications Corp. (“CTC”) and Lightship Telecom, LLC (“Lightship”), by its undersigned counsel and, pursuant to N.H. Admin Rules Puc 203.02, move the New Hampshire Public Utilities Commission (“Commission”) for leave to intervene in the above-captioned proceeding.

CTC’s and Lightship’s rights, duties, privileges and other substantial interests will be affected by the outcome of this proceeding. Both carriers are leading CLECs in New Hampshire and provide telecommunications services to many customers throughout the State. Similarly, both carriers have a substantial infrastructure in place throughout the State of New Hampshire. Furthermore, both carriers are collocated in various wire centers throughout New Hampshire. In addition, both carriers employ numerous personnel involved in sales, marketing and operations activities throughout New Hampshire, many of whom have their primary residence in this state.

Given their demonstrated commitment to the New Hampshire telecommunications market, CTC and Lightship not only have a significant interest in the outcome of the above-referenced proceeding, but also are well positioned to comment on the conditions of competition in the New Hampshire telecommunications market.

As part of this proceeding, the Commission will investigate issues related to Verizon's obligation as an ILEC to provision certain unbundled network elements ("UNEs") to competitive local exchange carriers such as ourselves pursuant to Section 251 of the Telecommunications Act of 1996, 47 U.S.C. § 251, and the Federal Communications Commission's *Triennial Review Remand Order* (TRO Remand Order), 2005 WL 289015 (F.C.C., Feb. 4, 2005). Specifically, Per the Commission's Order of Notice, plans to address three issues of concern to CTC and Lightship:

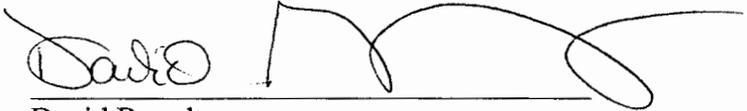
- 1) The method of dealing with already-provisioned UNE services in affected wire centers;
- 2) The determination of which wire centers in New Hampshire are affected and what procedure the Commission should adopt for future determinations with respect to affected wire centers; and
- 3) The determination, if deemed necessary by the Commission, whether Verizon remains obliged to provision the affected UNEs at any New Hampshire wire centers by virtue of Verizon's status as an RBOC that has obtained authority under section 271 of the Telecommunications Act, 47 U.S.C. § 271, to provide interLATA long-distance service in New Hampshire.

Since both CTC and Lightship purchase UNEs from Verizon in New Hampshire, the Commission's decisions in these issues will have a direct impact on both carriers and how they operate their businesses in this state.

Finally, no party will be prejudiced by CTC and Lightship's intervention at this time. Both carriers will conform to the procedural schedule as established in the Commission's Order of Notice dated April 22nd, 2005.

Wherefore, CTC and Lightship move that their motion be granted.

Respectfully submitted,



David Berndt

Dated: May 19, 2005

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