

November 2, 2005

**Notice: Enclosed Responses  
Contain Confidential Information**

**VIA FEDERAL EXPRESS**

Debra A. Howland  
Executive Director & Secretary  
New Hampshire Public Utilities Commission  
8 Old Suncook Road  
Concord, NH 03301

**RE: Verizon New Hampshire, Wire Center Investigation, Docket No. DT 05-083**

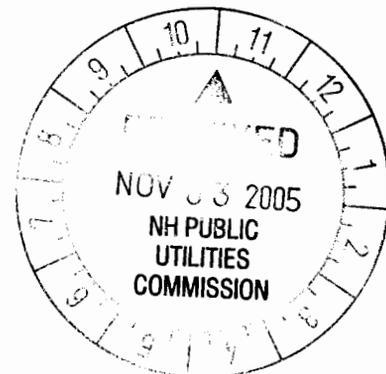
Dear Ms. Howland:

Enclosed are the Confidential Responses of Oxford Networks to the Data Requests issued by the Commission Staff on August 22, 2005, in the above-captioned docket. Also enclosed is a Motion for Confidential Treatment regarding said Responses.

I request that the Commission authorize and enter the appearance of the undersigned counsel on behalf of Oxford Networks in this proceeding. Section PUC 201.03(a)(4) of the Commission's Rules provides that a person authorized by the Commission pursuant to RSA 365:10-a may act as a representative of a party before the Commission. In support of this request for authorization, I state my agreement to adhere to the Commission's rules of practice and procedure, and to any orders of the Commission or agreements among the parties to this docket, including orders or agreements addressing confidentiality. I am an attorney in good standing in the State of Maine and practice frequently before the Maine Public Utilities Commission and have appeared in a number of proceedings before the New Hampshire Public Utilities Commission. Also, please note that our firm has an office in Concord, NH, staffed by attorneys admitted to practice in the State of New Hampshire, who are available to assist in this representation, if necessary.

Accordingly, please enter the following on the Service List in this case on behalf of Oxford Networks.

Joseph G. Donahue, Esq.  
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PRETI FLAHERTY  
Debra A. Howland  
November 2, 2005  
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A copy of this submission is being provided by email in pdf format to:  
adele.leighton@puc.nh.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph G. Donahue". The signature is written in a cursive style with a large, looped initial "J".

Joseph G. Donahue  
Counsel for Oxford Networks

JGD:amp  
Enclosure  
cc: Brian C. Paul, Oxford Networks

**BEFORE THE  
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION**

VERIZON NEW HAMPSHIRE  
Wire Center Investigation

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)Docket No. DT 05-083

**MOTION OF OXFORD NETWORKS FOR CONFIDENTIAL  
TREATMENT OF RESPONSES TO DATA REQUESTS**

Pursuant to N.H. Rev. Stat. Ann. §378:43 and N.H. Admin. Rules, PUC 204.06, Oxford Networks respectfully requests that the Public Utilities Commission ("Commission") grant confidential treatment to its Responses to Data Requests issued by the Commission Staff in the above-captioned proceeding. Pursuant to Rule PUC 204.06, Oxford Networks states as follows:

The Responses are submitted pursuant to RSA §378:43, which provides that information or records provided by a telephone utility to the Commission shall not be considered public records for purposes of RSA 91-A, if the information or records satisfy the requirements of §378.43. Oxford Networks submits that the business information contained in its Responses is not general public knowledge or published elsewhere; that measures have been taken by Oxford Networks to prevent dissemination of the information in the ordinary course of business; and that the information pertains to the provision of competitive services. Disclosure of any or all of this confidential information would cause substantial competitive and financial harm to Oxford Networks.

Accordingly, Oxford Networks requests that the Commission find that the Responses are within the exemptions permitted by RSA 91-A:5, IV and RSA 378:43 and shall be granted confidentiality, and protected by the Commission in accordance with the provisions of RSA 378:43 and Rule PUC 204.06.

Dated at Augusta, Maine on the 2<sup>nd</sup> day of November, 2005.

Respectfully submitted,



Joseph G. Donahue  
Counsel for Oxford Networks

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