

Orr&Reno

Professional Association

One Eagle Square, P.O. Box 3550, Concord, NH 03302-3550
Telephone 603-224-2381 • Facsimile 603-224-2318
www.orr-reno.com

Malcolm McLane
(Retired)

May 1, 2007

VIA HAND DELIVERY

Ms. Debra A. Howland, Executive Director and Secretary
NH Public Utilities Commission
21 S. Fruit St., Suite 10
Concord, NH 03301-2429



***Re: DT 07-027, TDS Telecommunications Corporation-
Request for Alternative Form of Regulation***

Dear Ms. Howland:

Enclosed please find an original and seven copies of my appearance and a Petition to Intervene for filing in the above-captioned docket on behalf of segTEL, Inc.

Please do not hesitate to contact me if you have any questions. Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Susan S. Geiger".

Susan S. Geiger

Enclosures

cc: Frederick J. Coolbroth, Esquire
Office of Consumer Advocate

Ronald L. Snow
William L. Chapman
George W. Roussos
Howard M. Moffett
James E. Morris
John A. Malmberg
Martha Van Oot
Douglas L. Patch
Connie L. Rakowsky
Jill K. Blackmer
James P. Bassett
Emily Gray Rice
Steven L. Winer
Peter F. Burger
Lisa Snow Wade
Jennifer A. Eber
Connie Boyles Lane
Jeffrey C. Spear
James F. Laboe
John M. Zaremba
Maria M. Proulx
Phillip Rakhunov
Jessica E. Storey
Justin M. Boothby

Susan S. Geiger
Judith A. Fairclough
(Of Counsel)

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

Docket No. DT 07-027

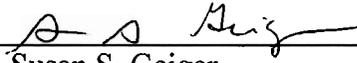
TDS TELECOMMUNICATIONS CORPORATION

Appearance

Please enter my Appearance as counsel for segTEL, Inc., as Intervenor in the above-captioned case. Susan S. Geiger is licensed to practice law in New Hampshire and agrees to adhere to the Commission's rules of practice and procedure and to any orders of the Commission or agreements between the parties in the docket including those relating to confidentiality.

Respectfully submitted,

segTEL, Inc.
By Its Attorneys,
ORR & RENO, P.A.
One Eagle Square
Concord, N.H. 03302-3550
Telephone: (603) 223-9154

By: 
Susan S. Geiger

Dated: May 1, 2007

Certificate of Service

I hereby certify that a copy of the foregoing Appearance has on this 1st day of May, 2007 been mailed first class postage prepaid to counsel of record for TDS Telecommunications Corporation, Kearsarge Telephone Company, Wilton Telephone Company, Hollis Telephone Company, and Merrimack County Telephone Company and to the Office of Consumer Advocate.

By: 
Susan S. Geiger

**THE STATE OF NEW HAMPSHIRE
BEFORE
THE PUBLIC UTILITIES COMMISSION**

Docket No. DT 07-027

TDS TELECOMMUNICATIONS CORPORATION

ALTERNATIVE FORM OF REGULATION

Petition to Intervene on Behalf of segTEL, Inc.

NOW COMES segTEL, Inc. ("segTEL"), by and through its undersigned attorneys, and respectfully petitions the New Hampshire Public Utilities Commission (Commission) for leave to intervene as a full party in the above-captioned proceeding under Admin. Rule Puc 203.17. In support of this Petition, segTEL represents as follows:

1. By Order of Notice dated April 10, 2007 in the above-captioned docket, the Commission indicated that Kearsarge Telephone Company (KTC), Wilton Telephone Company (WTC), Hollis Telephone Company (HTC) and Merrimack County Telephone Company (MCT), wholly owned subsidiaries of TDS Telecommunications Corporation (TDS Telecom), filed petitions with the Commission requesting approval for an alternate form of regulation pursuant to RSA 374:3-b. The Order of Notice states, *inter alia*, that the filing raises issues related to whether the proposed alternate form of regulation meets the requirements of RSA 374:3-b, and that any parties seeking to intervene shall submit petitions to the Commission on or before May 1, 2007.

2. segTEL has been licensed as a facilities-based competitive local exchange carrier (CLEC) in New Hampshire since 1999 and has collocated facilities in over 25 Verizon central offices in New Hampshire. segTEL has invested extensive resources to

provide service to traditionally neglected and underserved markets in Coos, Grafton, Sullivan and Carroll counties.

3. The Commission has ordered that any party seeking to intervene in the instant matter must submit a petition on or before May 1, 2007 stating the facts demonstrating how its rights, duties, privileges, immunities or other substantial interest may be affected by the proceeding as required by N.H. Admin. Rule Puc 203.17 and RSA 541-A:32, I(b).

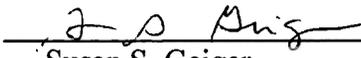
4. In accordance with the Commission's Order, segTel submits the following facts in support of its Petition to Intervene: (a) segTEL provides telecommunications service in areas adjacent to those in which TDS Telecom operates; (b) segTEL provides information services to customers within the areas served by TDS Telecom; and (c) segTEL is interested in providing telecommunications services in the TDS service areas in the near future. Because TDS has asserted that it qualifies for an alternative form of regulation because it faces competition from competitive wireline companies, segTEL is interested in seeing that the matters adjudicated in this docket do not impair the competitiveness of the markets within which TDS operates and in which segTEL hopes to enter. Accordingly, segTEL's duties, privileges, immunities and other substantial interests are affected within the meaning of RSA 541-A:32, I(b).

5. As this Petition is timely filed in accordance with the Commission's Order of Notice in this docket, granting intervention to segTEL would not impair the orderly and prompt conduct of the proceedings and would be in the interests of justice.

WHEREFORE, segTEL respectfully requests that the Commission grant it full intervenor status in this proceeding.

Respectfully submitted,

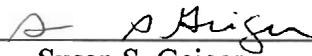
segTEL, Inc.,
By Its Attorneys,
ORR & RENO, P.A.
One Eagle Square
Concord, NH 03302-3550
Telephone: (603) 223-9154

By: 
Susan S. Geiger

May 1, 2007

Certificate of Service

I hereby certify that a copy of the foregoing Petition has on this 1st day of May, 2007 been mailed first class postage prepaid to counsel of record for TDS Telecommunications Corporation, Kearsarge Telephone Company, Wilton Telephone Company, Hollis Telephone Company, and Merrimack County Telephone Company and to the Office of Consumer Advocate.


Susan S. Geiger