

DT 16-872

THE STATE OF NEW HAMPSHIRE

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March 31, 2017

Debra A. Howland  
Executive Director  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301

**Re: DT 16-872, Consolidated Communications Holdings, Inc.  
Joint Petition for Findings in Furtherance of the Acquisition of FairPoint Communications, Inc. and its New Hampshire Operating Subsidiaries  
Request for Extension of Discovery and Testimony Filing Deadlines**

Dear Ms. Howland:

Commission Staff hereby requests that the Commission modify the procedural schedule in this proceeding to extend the end date for rolling discovery and the deadline for filing of direct testimony by Staff and the Labor Intervenors, which is currently March 31, 2017.

Staff makes this request because of delays experienced in completing its initial discovery. Only this week did Consolidated provide responses to many of Staff's first set data requests, as well as responses to Staff's third set data requests. Staff and its consultant, Liberty Consulting Group, are in the process of completing a full review and evaluation of those new discovery responses. Based on preliminary review of the responses, it is apparent that supplemental information is required and additional follow-up data requests are warranted with respect to a significant number of the responses.

Staff therefore respectfully requests that the Commission modify the procedural schedule in this proceeding to extend the end date for rolling discovery until April 5, 2017 and to extend the deadline for filing of direct testimony by Staff and the Labor Intervenors until April 19, 2017.

The joint petitioners have been made aware of these proposed schedule modifications, but have indicated that they do not agree with the requested changes.

If you should have any questions regarding this filing, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "David Wiesner".

David K. Wiesner  
Staff Attorney

cc: Service List