

February 15, 2024

Daniel C. Goldner, Chair
New Hampshire Public Utilities Commission
21 South Fruit Street
Concord, NH 03301

RE: DT 20-138, Order *Nisi* No. 26,926 (Jan. 5, 2024)
DT 23-078, Order *Nisi* No. 29,927 (Jan. 5, 2024)
DT 23-079, Order *Nisi* No. 26,928 (Jan. 5, 2024)

Dear Chair Goldner:

TDS Telecommunications LLC (“TDS”), as Petitioner in the above-referenced dockets, respectfully asks the Public Utilities Commission (“PUC”) to extend the compliance deadlines set in its Orders *Nisi* on January 5, 2024. As explained below, TDS was not aware of the original compliance deadlines and is eager to conclude regulatory review in these matters. TDS’s counsel has contacted each of the competitive carriers to request their assent to the requested extensions. I am authorized to state that Barr Tell USA, LLC and Integrated Path Communications, LLC have assented to TDS’s extension request; Level 3 Communications, L.L.C. has not yet responded with either an assent or an objection.

On January 5, 2024, the Public Utilities Commission (“PUC”) issued Orders *Nisi* conditionally approving interconnection agreements filed on behalf of TDS Telecom in the following dockets:

- DT 20-138 Interconnection Agreement Between TDS Telecommunications LLC and Level 3 Communications, L.L.C.
- DT 23-078 Interconnection Agreement Between TDS Telecommunications LLC and Barr Tell USA, LLC
- DT 23-079 Interconnection Agreement Between TDS Telecommunications LLC and Integrated Path Communications, LLC

For reasons that remain unclear, the emails from the PUC Clerk’s Office transmitting the Orders *Nisi* were delivered to TDS counsel’s “Junk” folder, where they went unnoticed for nearly a month. At the same time, TDS itself experienced a transition of its senior regulatory staff in December 2023, so that the responsible TDS personnel were not immediately apprised of the PUC’s Orders *Nisi*. TDS and its New Hampshire counsel regret these inadvertent oversights.

As a result of these events, TDS and its counsel did not become aware of the Orders *Nisi* until last week, by which time the critical dates set by the PUC for final approval had passed.

TDS and the competitive providers are eager to implement their respective Interconnection Agreements. Accordingly, TDS asks the PUC to set new dates for the compliance steps that TDS must take in order to convert the Orders *Nisi* into final orders of approval.

Thank you for your attention to these matters. Please let me know if you have any questions.

Very truly yours,

Paul J. Phillips, Esq.

Paul J. Phillips, Esq.

Counsel for TDS Telecommunications LLC

cc: Kit Beyer, TDS Telecommunications LLC
Gary Black, Vice President, Carrier Relations, Level 3 Communications, L.L.C.
Harold Barr, President, Barr Tell USA, LLC
Brian Shepard, President & CEO, Integrated Path Communications, LLC