



Kevin M. Shea  
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July 2, 2010

Kathryn M. Bailey, P.E.  
Director, Telecommunications Division  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301-2429



**RE: Northern New England Telephone Operations LLC d/b/a FairPoint Communications - NNE ("FairPoint"), Compliance with Commission Order Dated February 25, 2008 in Docket No. DT 07-11.**

Dear Ms. Bailey:

Pursuant to Section 10.7 of the Settlement Agreement between the Joint Petitioners and the Commission Staff, dated January 23, 2008, as approved by the Commission's Order dated February 25, 2008, in Docket No. DT 07-011, the attached document is FairPoint Communications first filing outlining the inventory of Double Poles within the State of New Hampshire.

Within the attachments you will find an overview of the project, a key to terminology utilized within this report and a detailed list of double poles broken down by FairPoint garage locations.

Please acknowledge receipt of this letter and its enclosures by signing or stamping and dating the receipt copy of this letter. Please let me know of any questions or concerns.

Sincerely,

A handwritten signature in blue ink that reads "Kevin M. Shea".

Kevin M. Shea

cc: Meredith Hatfield  
Amanda Noonan  
File

**Summary - Report based on 06.30.2010 data extract.**

Fairpoint will highlight as requested by the Public Utility Commission the state of dual poles within the State of NH.

**Fairpoint Maintenance Areas**

FairPoint has currently **196 poles** that are statused ready for Fairpoint to transfer. There are a total of **2,744** poles that we show in various stages of transfer including pending pole sets and work in progress. In the first quarter of 2010, **Fairpoint completed 1510 dual pole removals including transfers within their maintaining areas.**

**Electric's Maintenance Areas**

In a Power Company Maintaining area, Fairpoint shows 366 **transfers** that are currently in Fairpoint's realm (RDY FRP). Majority of these have been a result of field verification on engineering work orders preceding 7/2006 as there was no formal notification system in place prior to that date if any took place at all. Fairpoint also **completed 1,682 transfers in Power Company maintenance areas where the Power Companies** were notified to remove the poles as the work was completed. This equates to

This equates to approximately 3,098 poles addressed for the months of

**April, May, and June. Presuming the Power Companies**

are indeed returning to remove the poles as they were notified..

Ready FairPoint in FairPoint Maintenance	196
Ready FairPoint in Power Co. Maintenance	366
<b>Total Ready FairPoint</b>	<b>562</b>
FairPoint Completions in FairPoint Maintenance	1510
FairPoint Completions in Power Co. Maintenance	1682
<b>Total FairPoint Completions</b>	<b>3192</b>

To better understand this report it is important to realize what and where certain responsibilities lie.

#### Telco Maintenance

This would be defined as an area where FairPoint has the responsibility for poles sets for both Maintenance and New Construction.

##### **Maintenance**

Maintenance can be described as replacing poles as a result of deterioration, man made or weather related damages.

##### **New Construction**

Can be defined as pole extensions, new developments, services poles etc. any time a new pole is required to provide service.

##### **Service Poles**

As a side bar, it is important to understand that in today's competitive environment we do not always secure a customer when a new home is built. If the builder/customer does not wish to have Telco service, we will not set the new pole, inform the power company to proceed in setting the pole and any future maintenance would fall within the power company's responsibility.

##### **Dual Poles**

The tracking of dual poles fall within the maintainer's realm of responsibility. In a Telco Maintenance environment, FairPoint will be responsible in tracking and notifying attachees when they need to transfer their facilities.

##### **Attachees**

Attachees can be referred to as the joint owner, joint user, municipal which includes both fire alarm and governmental use, CLECS, and CATV. Governmental use is currently a term being utilized within the LGC while trying to negotiate a standard license with the pole owners in NH.

#### Lts. Maintenance

##### **Maintenance**

This reference is to the power companies where they are responsible for the replacement of poles as a result of deterioration, damage from acts of God or man made damage.

##### **New Construction**

Can be defined as pole extensions, new developments, services poles etc. any time a new pole is required to provide service.

##### **Service Poles**

This is a pole required by a builder/owner when they call for service to a new/or refurbished building.

##### **Dual Poles**

In a Lts Maintenance area, the Lt Co. is responsible for notifying the attachees. NGRID is the only exception to this rule.

#### Pole removal responsibility

This can certainly get confusing. There are different requirements depending on the verbiage within each individual IOPs. In NH, timelines with two Power Companies exists. PSNH and Unittel require FairPoint to transfer their facilities within 60 days or FairPoint inherits the responsibility of the pole removal.

FairPoint has been tracking Lts. time frames and have started to reciprocate in the pole removal responsibility. PSNH did point out that the IOP is contradictory in this arena therefore will not be held accountable to the 60 days as Fairpoint is.

#### Other

As you look at the **Other** category, this implies the status of transfer is other than listed. It includes all other CLECs, Municipality, CATVs and other power companies where the volume is lower. Listing all would be cumbersome.

#### Pending Pole Sets

This criteria includes records where work has not yet been authorized as a result of service dates being out and can include some work that is ongoing and not yet complete. This includes pending pole sets, pole setting in progress, supporting structure in progress, and tree trimming.

#### Why certain entities are included in the report

Based on the data FairPoint has accumulated, during the days of Verizon, it is apparent that others are responsible as well for the timely transference of facilities.

The report includes the 4 power companies that were involved in negotiations as a condition of the merger/spin-off of Verizon.

Also included is the major CATV company who contributes to a significant number of dual poles for which both Lts and FRP continue to notify CATV with poor results.

#### Database Maintained by FairPoint (history)

FairPoint had met with all the power companies in the State in 2006 to explain and inform everyone of our formal notification system.

This system consist of electronic notification of pertinent data each company can relate to such as each other's pole numbers, memo numbers, street location including Municipality. Notifications go out for pole set completions, transfer request, and transfer completions so the pole removal can take place. This data is only as good as the notices we receive, if received. Participation is not 100% as Fairpoint has the only tracking mechanism in place. We sometimes receive multiple notices for the same work and other times we receive little to no notice. The two companies who participate the most are PSNH and Unittel. Others are sporadic if anything is received at all. Fairpoint continually purges the database through various reports and periodic field reviews, not to mention updated list are sent out to the various attachees requesting they update their information. This is helpful on older jobs that have remained in a particular state for an extended amount of time.

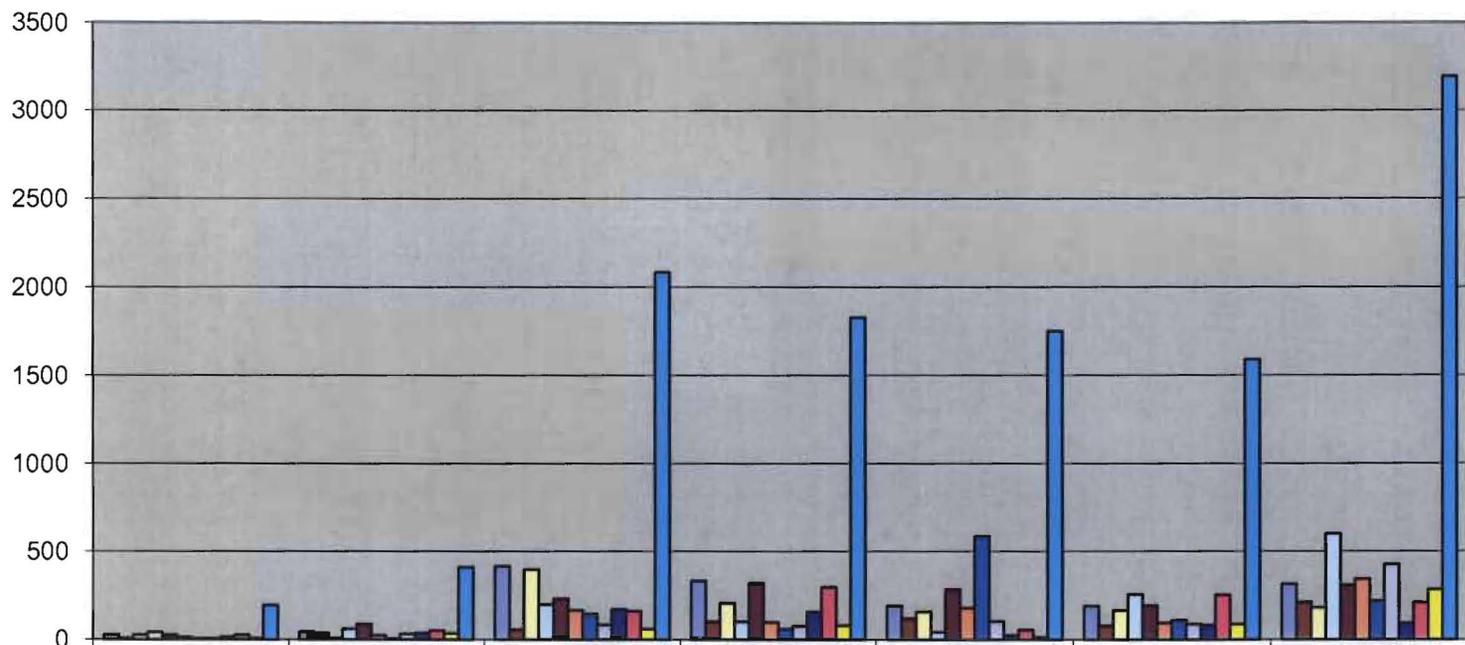
As valued as this database is, it has been requested by some Power Companies to go to a Web based application so everyone has access to the system and can update their own data. Fairpoint is also interested as it would relieve us of the responsibility of inputting and tracking everyone's status.



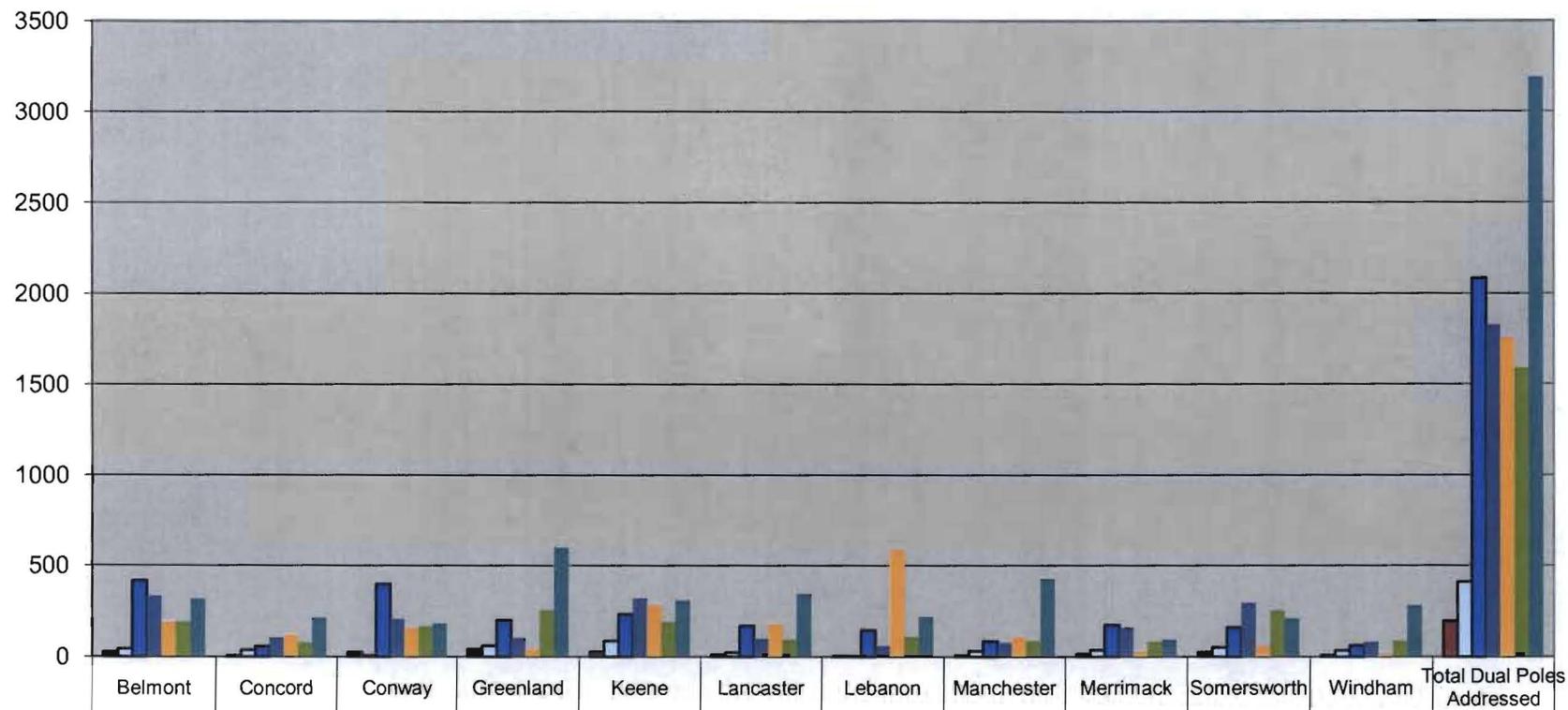




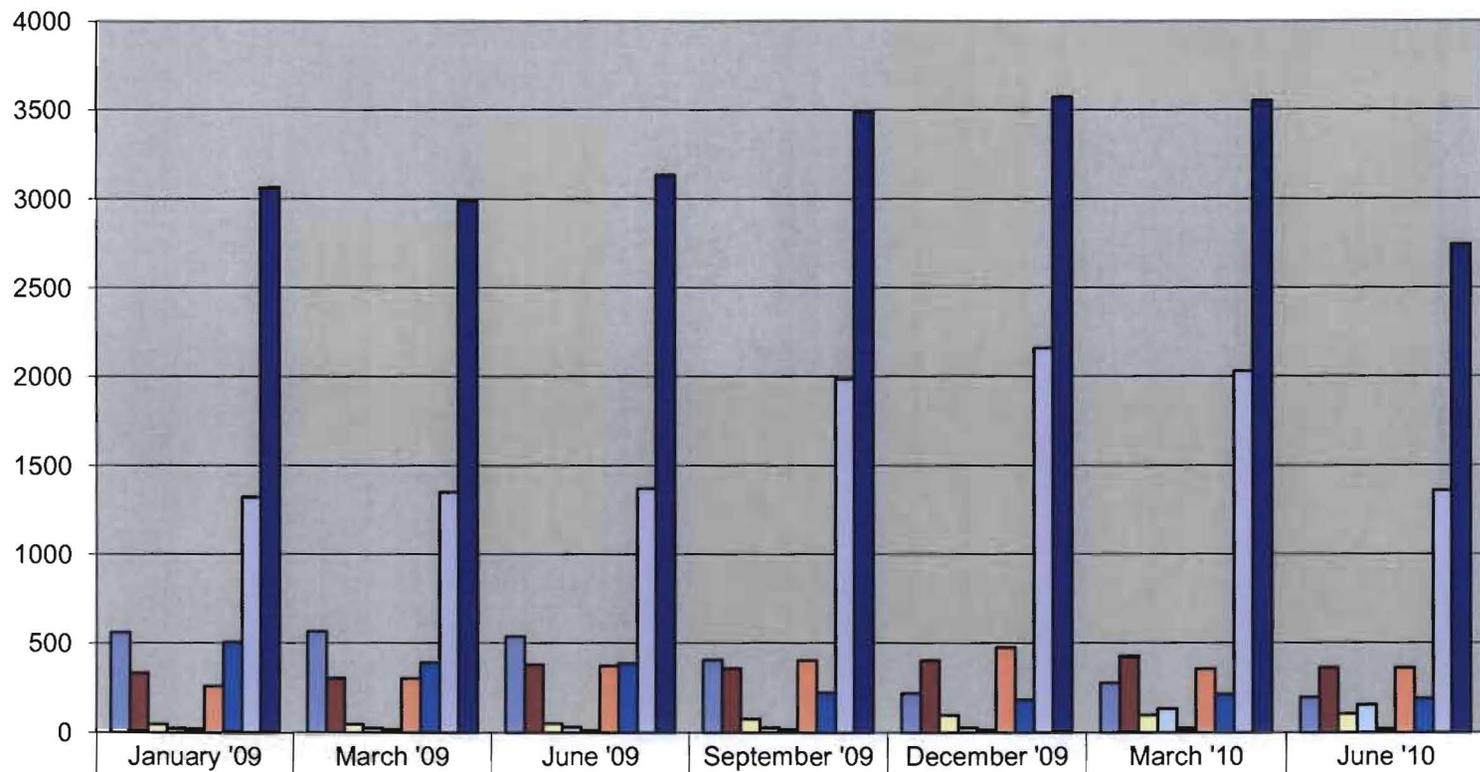
<i>Data Extracted</i>	1.31.2009	3.28.2009	6.30.09	9.30.09	1.04.2010	4.1.2010	6.30.2010
<b>Dual Poles Rmvd Telco</b>	January '09	March '09	June '09	September '09	December '09	March '10	June '10
Belmont	2	29	115	64	110	127	157
Concord	0	18	20	53	108	39	103
Conway	1	4	36	27	6	4	62
Greenland	4	26	93	64	13	116	192
Keene	0	28	118	131	162	140	132
Lancaster	5	12	40	32	41	24	175
Lebanon	3	3	37	43	303	23	78
Manchester	0	1	31	44	61	67	209
Merrimack	10	22	27	69	8	48	53
Somersworth	6	24	20	175	24	209	111
Windham	1	15	38	61	4	40	238
<b>Total Telco Maint.</b>	<b>32</b>	<b>182</b>	<b>575</b>	<b>763</b>	<b>840</b>	<b>837</b>	<b>1510</b>
<b>Dual Poles Transferred</b>	January '09	March '09	June '09	September '09	December '09	March '10	June '10
Belmont	25	14	300	268	82	63	158
Concord	7	18	36	48	12	38	109
Conway	24	3	361	179	151	161	119
Greenland	37	33	106	38	28	138	408
Keene	26	58	113	189	122	51	177
Lancaster	7	11	127	66	137	70	169
Lebanon	2	1	107	16	281	86	140
Manchester	6	30	52	31	42	19	218
Merrimack	4	14	145	89	16	34	40
Somersworth	19	27	140	121	30	44	99
Windham	7	20	22	19	9	47	45
<b>Total Lt. Maint.</b>	<b>164</b>	<b>229</b>	<b>1509</b>	<b>1064</b>	<b>910</b>	<b>751</b>	<b>1682</b>
<b>Dual Poles Total Completed</b>	January '09	March '09	June '09	September '09	December '09	March '10	June '10
Belmont	27	43	415	332	192	190	315
Concord	7	36	56	101	120	77	212
Conway	25	7	397	206	157	165	181
Greenland	41	59	199	102	41	254	600
Keene	26	86	231	320	284	191	309
Lancaster	12	23	167	98	178	94	344
Lebanon	5	4	144	59	584	109	218
Manchester	6	31	83	75	103	86	427
Merrimack	14	36	172	158	24	82	93
Somersworth	25	51	160	296	54	253	210
Windham	8	35	60	80	13	87	283
<b>Total Dual Poles Addressed</b>	<b>196</b>	<b>411</b>	<b>2084</b>	<b>1827</b>	<b>1750</b>	<b>1588</b>	<b>3192</b>



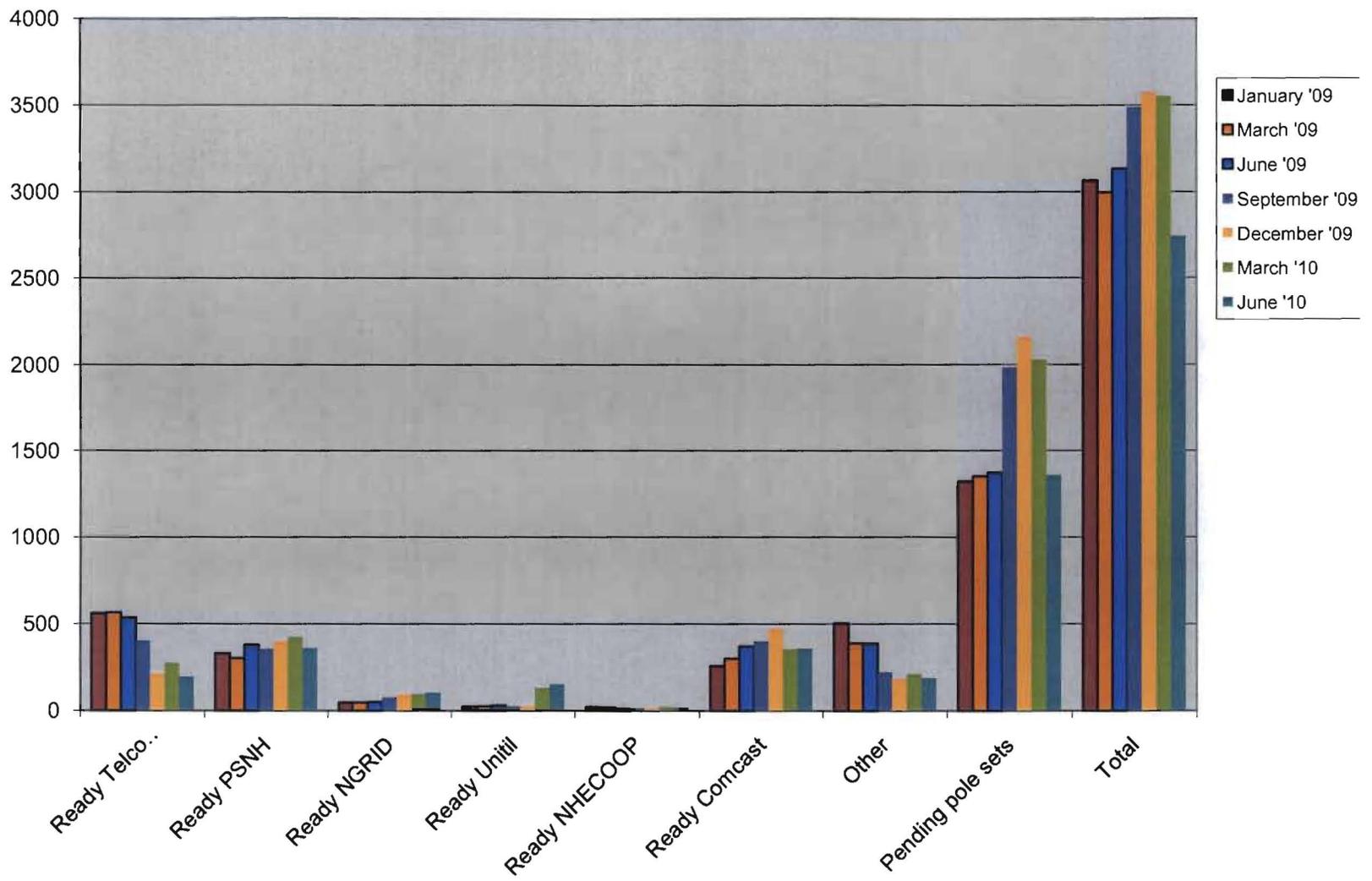
	January '09	March '09	June '09	September '09	December '09	March '10	June '10
■ Belmont	27	43	415	332	192	190	315
■ Concord	7	36	56	101	120	77	212
□ Conway	25	7	397	206	157	165	181
□ Greenland	41	59	199	102	41	254	600
■ Keene	26	86	231	320	284	191	309
□ Lancaster	12	23	167	98	178	94	344
■ Lebanon	5	4	144	59	584	109	218
□ Manchester	6	31	83	75	103	86	427
■ Merrimack	14	36	172	158	24	82	93
■ Somersworth	25	51	160	296	54	253	210
■ Windham	8	35	60	80	13	87	283
■ Total Dual Poles Addressed	196	411	2084	1827	1750	1588	3192



	Belmont	Concord	Conway	Greenland	Keene	Lancaster	Lebanon	Manchester	Merrimack	Somersworth	Windham	Total Dual Poles Addressed
■ January '09	27	7	25	41	26	12	5	6	14	25	8	196
□ March '09	43	36	7	59	86	23	4	31	36	51	35	411
■ June '09	415	56	397	199	231	167	144	83	172	160	60	2084
■ September '09	332	101	206	102	320	98	59	75	158	296	80	1827
■ December '09	192	120	157	41	284	178	584	103	24	54	13	1750
■ March '10	190	77	165	254	191	94	109	86	82	253	87	1588
■ June '10	315	212	181	600	309	344	218	427	93	210	283	3192



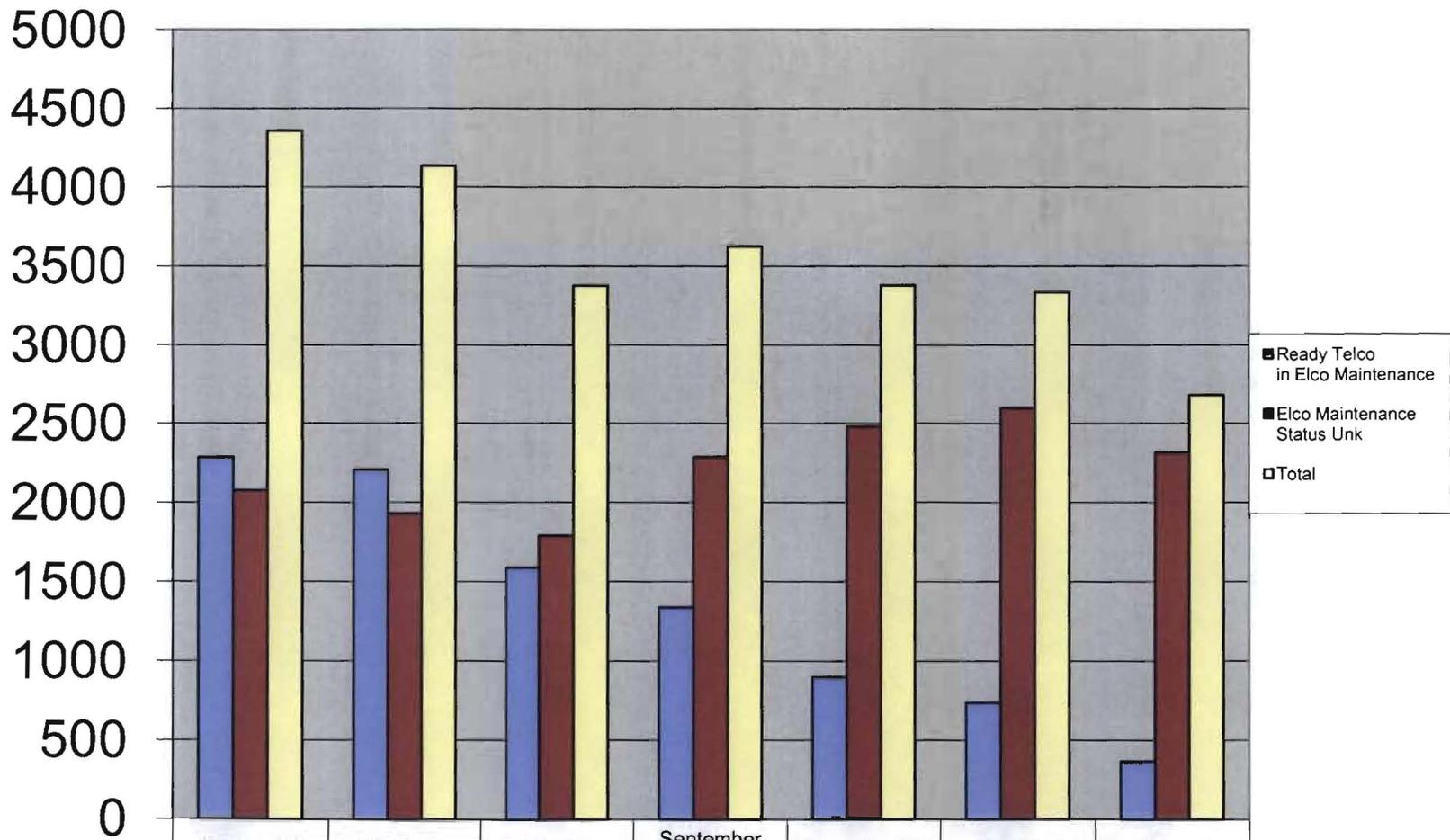
	January '09	March '09	June '09	September '09	December '09	March '10	June '10
Ready Telco in Telco Maintenance	559	564	535	404	219	276	196
Ready PSNH	331	302	379	357	402	426	362
Ready NGRID	47	47	50	76	96	96	104
Ready Unitil	24	25	30	27	26	132	155
Ready NHECOOP	20	17	11	16	15	24	19
Ready Comcast	258	301	371	401	473	355	360
Other	503	388	386	223	183	214	190
Pending pole sets	1321	1350	1370	1983	2158	2028	1358
<b>Total</b>	<b>3063</b>	<b>2994</b>	<b>3132</b>	<b>3487</b>	<b>3572</b>	<b>3551</b>	<b>2744</b>



**Elco Maintenance Area**

	1.31.09	3.28.09	6.30.09	9.30.09	1.04.2010	4.1.2010	6.30.2010
<b>Belmont</b>	<b>January '09</b>	<b>March '09</b>	<b>June '09</b>	<b>September '09</b>	<b>December '09</b>	<b>March '10</b>	<b>June '10</b>
Ready Telco	386	407	251	121	82	52	30
Elco Maintenance							
Status Unknown	324	265	165	163	180	208	184
Total	710	672	416	284	262	260	214
<b>Concord</b>	<b>January '09</b>	<b>March '09</b>	<b>June '09</b>	<b>September '09</b>	<b>December '09</b>	<b>March '10</b>	<b>June '10</b>
Ready Telco	53	10	7	10	2	15	6
Elco Maintenance							
Status Unknown	57	75	93	101	126	141	93
Total	110	85	100	111	128	156	99
<b>Conway</b>	<b>January '09</b>	<b>March '09</b>	<b>June '09</b>	<b>September '09</b>	<b>December '09</b>	<b>March '10</b>	<b>June '10</b>
Ready Telco	508	506	293	166	179	113	15
Elco Maintenance							
Status Unknown	209	208	185	243	213	185	196
Total	717	714	478	409	392	298	211
<b>Greenland</b>	<b>January '09</b>	<b>March '09</b>	<b>June '09</b>	<b>September '09</b>	<b>December '09</b>	<b>March '10</b>	<b>June '10</b>
Ready Telco	85	33	6	6	7	6	0
Elco Maintenance							
Status Unknown	322	314	311	389	542	533	264
Total	407	347	317	395	549	539	264
<b>Keene</b>	<b>January '09</b>	<b>March '09</b>	<b>June '09</b>	<b>September '09</b>	<b>December '09</b>	<b>March '10</b>	<b>June '10</b>
Ready Telco	242	221	185	109	58	88	50
Elco Maintenance							
Status Unknown	250	238	214	263	165	167	167
Total	492	459	399	372	223	255	217
<b>Lancaster</b>	<b>January '09</b>	<b>March '09</b>	<b>June '09</b>	<b>September '09</b>	<b>December '09</b>	<b>March '10</b>	<b>June '10</b>
Ready Telco	221	218	139	222	135	101	165
Elco Maintenance							
Status Unknown	134	126	168	290	372	407	403
Total	355	344	307	512	507	508	568
<b>Lebanon</b>	<b>January '09</b>	<b>March '09</b>	<b>June '09</b>	<b>September '09</b>	<b>December '09</b>	<b>March '10</b>	<b>June '10</b>
Ready Telco	436	441	378	434	180	120	33
Elco Maintenance							
Status Unknown	99	96	112	136	163	163	164
Total	535	537	490	570	343	283	197

<b>Manchester</b>	<b>January '09</b>	<b>March '09</b>	<b>June '09</b>	<b>September '09</b>	<b>December '09</b>	<b>March '10</b>	<b>June '10</b>	
Ready Telco		60	55	158	165	137	140	15
Elco Maintenance								
Status Unknown		229	222	193	260	262	267	225
<b>Total</b>		<b>289</b>	<b>277</b>	<b>351</b>	<b>425</b>	<b>399</b>	<b>407</b>	<b>240</b>
<b>Merrimack</b>	<b>January '09</b>	<b>March '09</b>	<b>June '09</b>	<b>September '09</b>	<b>December '09</b>	<b>March '10</b>	<b>June '10</b>	
Ready Telco		63	103	26	13	39	30	12
Elco Maintenance								
Status Unknown		154	112	111	83	62	70	77
<b>Total</b>		<b>217</b>	<b>215</b>	<b>137</b>	<b>96</b>	<b>101</b>	<b>100</b>	<b>89</b>
<b>Somersworth</b>	<b>January '09</b>	<b>March '09</b>	<b>June '09</b>	<b>September '09</b>	<b>December '09</b>	<b>March '10</b>	<b>June '10</b>	
Ready Telco		215	199	124	68	46	39	25
Elco Maintenance								
Status Unknown		204	199	159	213	281	358	384
<b>Total</b>		<b>419</b>	<b>398</b>	<b>283</b>	<b>281</b>	<b>327</b>	<b>397</b>	<b>409</b>
<b>Windham</b>	<b>January '09</b>	<b>March '09</b>	<b>June '09</b>	<b>September '09</b>	<b>December '09</b>	<b>March '10</b>	<b>June '10</b>	
Ready Telco		14	13	20	23	32	31	15
Elco Maintenance								
Status Unknown		93	75	78	145	114	100	157
<b>Total</b>		<b>107</b>	<b>88</b>	<b>98</b>	<b>168</b>	<b>146</b>	<b>131</b>	<b>172</b>
<b>Summary</b>	<b>January '09</b>	<b>March '09</b>	<b>June '09</b>	<b>September '09</b>	<b>December '09</b>	<b>March '10</b>	<b>June '10</b>	
Ready Telco in Elco Maintenance		2283	2206	1587	1337	897	735	366
Elco Maintenance								
Status Unk		2075	1930	1789	2286	2480	2599	2314
<b>Total</b>		<b>4358</b>	<b>4136</b>	<b>3376</b>	<b>3623</b>	<b>3377</b>	<b>3334</b>	<b>2680</b>



	January '09	March '09	June '09	September '09	December '09	March '10	June '10
Ready Telco in Elco Maintenance	2283	2206	1587	1337	897	735	366
Elco Maintenance Status Unk	2075	1930	1789	2286	2480	2599	2314
Total	4358	4136	3376	3623	3377	3334	2680

<b>Calculations</b>				
<b>FAIRPOINT REMOVAL</b>				
Number of Removals	1510		<u>COST</u>	<u>TOTAL</u>
High Cost Removal %	10%	151	<u>\$1,000</u>	
High Cost Transfer %	16%	24	\$600	\$38,656
Med Cost Transfer %	82%	124	\$300	\$160,966
Low Cost Transfer %	2%	3	\$0	\$3,020
Low Cost Removal %	90%	1359	<u>\$500</u>	
High Cost Transfer %	16%	217	\$600	\$239,184
Med Cost Transfer %	82%	1114	\$300	\$891,504
Low Cost Transfer %	2%	27	\$0	\$13,590
			<b>TOTAL</b>	<b>\$1,346,920</b>
<b>ELCO REMOVAL</b>				
Number of Transfers	1682		<u>COST</u>	<u>TOTAL</u>
High Cost Transfer %	16%	269	\$600	\$161,472
Med Cost Transfer %	84%	1413	\$300	\$423,864
Low Cost Transfer %	0%	0	\$0	\$0
			<b>TOTAL</b>	<b>\$585,336</b>

**NEW HAMPSHIRE DUAL POLE REMOVAL ESTIMATES**

<b>YEAR</b>	<b>POLES TRF/RMVD</b>	<b>COST</b>	<b>POLES TRF/ LTS</b>	<b>COST</b>	<b>SURVEY COST</b>	<b>TOTAL</b>
<b>2008</b>					\$ 173,200.00	\$ 173,200.00
<b>April</b>	165	\$ 123,888.00	220	\$ 76,560.00		\$ 200,448.00
<b>May</b>	225	\$ 200,700.00	232	\$ 80,736.00		\$ 281,436.00
<b>June</b>	97	\$ 86,524.00	293	\$ 101,964.00		\$ 188,488.00
<b>July</b>	152	\$ 135,584.00	244	\$ 84,912.00		\$ 220,496.00
<b>August</b>	117	\$ 104,364.00	379	\$ 131,892.00		\$ 236,256.00
<b>September</b>	142	\$ 126,664.00	296	\$ 103,008.00		\$ 229,672.00
<b>October</b>	149	\$ 132,908.00	356	\$ 123,888.00		\$ 256,796.00
<b>November</b>	123	\$ 109,716.00	341	\$ 118,668.00		\$ 228,384.00
<b>December</b>	0		0			\$ -
<b>Total</b>	<b>1170</b>	<b>\$ 1,020,348.00</b>	<b>2361</b>	<b>\$ 821,628.00</b>		<b>\$ 1,841,976.00</b>
<b>2009</b>						
<b>January</b>	0		0			\$ -
<b>February</b>	0		0			\$ -
<b>March</b>	182	\$ 162,384.00	229	\$ 79,692.00		\$ 242,076.00
<b>April</b>						\$ -
<b>May</b>						\$ -
<b>June</b>	576	\$ 513,792.00	1509	\$ 525,132.00		\$ 1,038,924.00
<b>July</b>						\$ -
<b>August</b>						\$ -
<b>September</b>	763	\$ 680,596.00	1064	\$ 370,272.00		\$ 1,050,868.00
<b>October</b>						\$ -
<b>November</b>						\$ -
<b>December</b>	840	\$ 749,280.00	910	\$ 316,680.00		\$ 1,065,960.00
<b>Total</b>	<b>2361</b>	<b>\$ 2,106,052.00</b>	<b>3712</b>	<b>\$ 1,291,776.00</b>		<b>\$ 3,397,828.00</b>
<b>2010</b>						
<b>January</b>						
<b>February</b>						\$ -
<b>March</b>	837	\$ 746,604.00	751	\$ 261,348.00		\$ 1,007,952.00
<b>April</b>						\$ -
<b>May</b>						\$ -
<b>June</b>	1510	\$1,346,920	1682	\$585,336		\$ 1,932,256.00
<b>July</b>						\$ -
<b>TOTAL</b>	<b>2347</b>	<b>\$2,093,524</b>	<b>2433</b>	<b>\$846,684</b>	<b>0</b>	<b>\$2,940,208</b>