

Jay E. Gruber
Senior Attorney

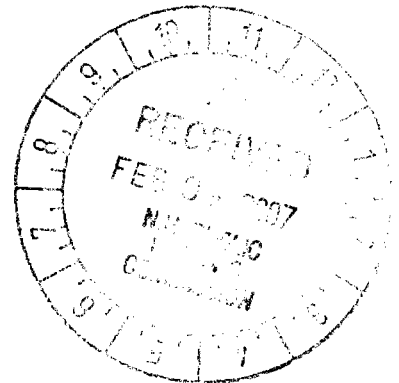
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February 8, 2007

VIA E-MAIL AND OVERNIGHT MAIL

Debra A. Howland
Executive Director and Secretary
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

**CONFIDENTIAL
MATERIAL
IN COMM FILE**



RE: Docket No. 06-067, Bay Ring Petition for Investigation into Verizon New Hampshire's Practice of Imposing Access Charges, Including Carrier Common Line (CCL) Access Charges, on Calls Which Originate on BayRing's Network and Terminate on Wireless Carriers' Networks

Dear Secretary Howland:

Enclosed please find:

AT&T COMMUNICATIONS OF NEW ENGLAND, INC. ESTIMATE OF
IMPROPERLY BILLED VERIZON NEW HAMPSHIRE ACCESS CHARGES, with
accompanying spreadsheets.

AT&T has enclosed here both a confidential and redacted version of its pleading. Please note that the confidential version of the pleading and accompanying spreadsheets contain proprietary and confidential information and are being provided to the Commission pursuant RSA 378:43.

If you have any questions regarding this matter, please contact me at the address or e-mail above. Thank you.

Sincerely,

Jay E. Gruber

cc: Service List (Redacted Version Only)

Enclosure

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

Bay Ring Petition For Investigation Into
Verizon New Hampshire's Practice Of
Imposing Access Charges, Including Carrier
Common Line (CCL) Access Charges, On
Calls Which Originate On Bayring's Network
And Terminate On Wireless Carriers' Networks

Docket No.06-067

**AT&T COMMUNICATIONS OF NEW ENGLAND, INC.
ESTIMATE OF IMPROPERLY BILLED
VERIZON NEW HAMPSHIRE ACCESS CHARGES**

Pursuant to the Procedural Order, dated November 29, 2006 (Order No. 24,705), AT&T Communications of New England, Inc. ("AT&T") hereby files its estimate of the general order of magnitude of the disputed charges billed by Verizon.

AT&T's estimate of the amount of improper access charges as of the end of November 2006 ranges from [REDACTED] to [REDACTED] depending upon the start date for estimating the improper charges.

In order to calculate its estimate, AT&T ran a monthly usage report of switch usage in New Hampshire and filtered the data by ACNA, Jurisdiction, and Direction (termination vs. originating), among other factors. AT&T then calculated the minutes of use ("MOU") to which the CCL was improperly applied by subtracting the Local Switching MOUs from the CCL MOUs. This yielded the excess MOUs subject to the CCL rate. The financial impact of improperly billing the CCL rate to the excess minutes was calculated by multiplying the CCL rate of \$.026494 times the excess CCL MOUs.

Enclosed as back up are spreadsheets showing these calculations and the disputed amounts by time period. AT&T considers the information contained in the spreadsheets

to be confidential and proprietary, as well as commercially and competitively sensitive. AT&T is, therefore, providing the enclosed spreadsheets only to the Commission and requests confidential treatment thereof pursuant to RSA 378:43.¹

These calculations are based on the best information now available to AT&T. AT&T reserves its right to amend these calculations in light of any further information that comes to light in the course of this proceeding. This calculation includes overcharges related to "local" traffic, for which Verizon has agreed to provide credit, but has not yet done so.

Respectfully submitted,

AT&T COMMUNICATIONS OF
NEW ENGLAND, INC.

By Its Attorney,

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Boston, MA 02111
(617) 574-3149 (phone)
(281) 664-9929 (fax)
jegrub@att.com

Dated: February 8, 2006

¹ The information contained in these spreadsheets is not available to the public. It is information contained on the bills that Verizon sends to AT&T for traffic volumes subject to Verizon charges in New Hampshire. Both AT&T and Verizon take measures to prevent dissemination of the information contained in these spreadsheets in the ordinary course of business. Moreover, such information pertains to AT&T's provision of competitive services. This information reflects the nature, usage and volume of AT&T's competitive services and could not be reproduced by any other person without substantial cost, if at all.