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Malcolm McLane
(Retired)

June 7, 2007

VIA HAND DELIVERY & E-MAIL

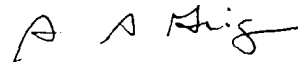
Ms. Debra A. Howland, Executive Director & Secretary
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301

**Re: DT 06-067, Petition of Freedom Ring Communications, LLC
d/b/a BayRing Communications (Motion to Compel)**

Dear Ms. Howland:

Enclosed for filing with the Commission in the above-captioned matter, please find an original and 7 copies of Bay Ring's Objection to Verizon's Motion to Compel. Please do not hesitate to contact me if you have any questions. Thank you for your attention to this matter.

Very truly yours,



Susan S. Geiger

SSG
Enclosure
cc: Service List
442842_1.DOC



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THE STATE OF NEW HAMPSHIRE

BEFORE THE

PUBLIC UTILITIES COMMISSION

DT 06-067

PETITION OF FREEDOM RING COMMUNICATIONS, LLC

d/b/a BAYRING COMMUNICATIONS

V.

VERIZON, NEW HAMPSHIRE

BAYRING'S OBJECTION TO VERIZON'S MOTION TO COMPEL

NOW COMES Freedom Ring Communications, LLC d/b/a BayRing Communications ("BayRing"), by and through its undersigned counsel, and objects to Verizon New Hampshire's Motion to Compel Discovery Responses dated June 1, 2007 by stating as follows:

1. Contrary to the representation made in the first paragraph of the above-referenced Motion, Verizon has not complied with the Commission's rules regarding discovery. More specifically, the Motion does not certify that the movant has made a good-faith effort to resolve the dispute informally as required by N.H. Admin. Rule Puc 203.09 (i)(4). In fact, Verizon did not contact BayRing for the purpose of attempting to informally resolve the issues raised in Verizon's Motion to Compel prior to filing that Motion. For that reason alone, the Motion should be denied.

2. BayRing objects to the questions posed by Verizon because they do not seek information which is reasonably calculated to lead to the discovery of admissible

evidence. Rather than seeking information or evidence, many questions seek BayRing's characterization of others' testimony. See, e.g. 3-6 (a), (b), and 3-12 (b), (c). Some questions seek BayRing's interpretation of Commission orders or tariffs and therefore call for a legal opinion. See, e.g. Vz 3-4, 3-6 (c), (d) and (e). Other questions are objectionable because they present incorrect characterizations of BayRing's prefiled testimony (3-13) or are simply argumentative and do not seek factual information (3-14). Accordingly, the questions to which BayRing has objected in this third round of discovery are neither reasonable nor reasonably calculated to lead to the discovery of admissible *evidence*. To the extent that those questions are designed to elicit *argument* (as opposed to evidence), such information has already been provided in the prefiled testimony and, to the extent it has not, it will be provided in BayRing's post-hearing brief. Therefore, no good reason exists to require BayRing to expend the time and resources to answer the questions to which it has objected.

3. Verizon's request that the Commission suspend the procedural schedule in this case until this discovery dispute is resolved should be denied. BayRing desires a prompt resolution of its complaint which was filed over a year ago. Delaying the schedule so that Verizon can pursue a third round of discovery in which it seeks argument rather than data is unfair, unreasonable and should not be permitted.

WHEREFORE, BayRing respectfully requests that this honorable Commission:

A. Deny the Motion to Compel filed by Verizon NH (including Verizon's request to suspend the procedural schedule);

B. Issue a decision expeditiously on the issues raised in Verizon's Motion and the within Objection; and

C. Grant such further relief as it deems appropriate.

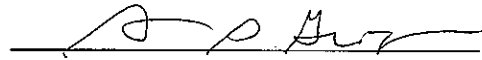
Respectfully submitted

Freedom Ring Communications, LLC
d/b/a BayRing Communications

By their attorneys,
ORR & RENO, P.A.
One Eagle Square
Concord, NH 03302-3550
Telephone: (603) 223-9154

By:

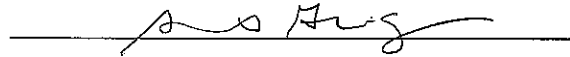
June 7, 2007



Susan S. Geiger

Certificate of Service

I hereby certify that a copy of the foregoing Motion has on this 7th day of June, 2007 been mailed first class postage prepaid and by e-mail to the parties on the Service List in the above-captioned matter.



Susan S. Geiger