

Orr&Reno

Professional Association

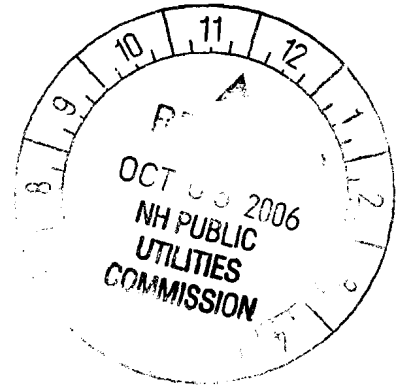
One Eagle Square, P.O. Box 3550, Concord, NH 03302-3550
Telephone 603-224-2381 • Facsimile 603-224-2318
www.orr-reno.com

October 5, 2006

Malcolm McLane
(Retired)

VIA FIRST CLASS MAIL

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

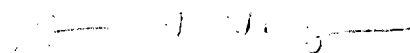


**Re: DT 06-067, Petition of Freedom Ring Communications, LLC
d/b/a BayRing Communications (Motion to Amend Petition)**

Dear Ms. Howland:

Enclosed for filing with the Commission in the above-captioned matter, please find BayRing's Motion to Amend its Petition. 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

Ronald L. Snow
William L. Chapman
George W. Roussos
Howard M. Moffett
James F. Morris
John A. Malmberg
Martha Van Oot
Douglas L. Patch
Connie L. Rakowsky
Jill K. Blackmer
James P. Bassett
Emily Gray Rice
Steven L. Winer
Peter F. Burger
Lisa Snow Wade
Jennifer A. Eber
Jeffrey C. Spear
Connie Boyles Lane
Todd C. Fahey
Vera B. Buck
James F. Laboe
John M. Zarembo
Maria M. Proulx
Phillip Rakhunov
Jessica E. Storey
Justin M. Boothby

Susan S. Geiger
Judith A. Fairclough
(Of Counsel)

Enclosure
cc: Service List

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

DT 06-067

**PETITION OF FREEDOM RING COMMUNICATIONS, LLC
d/b/a BAYRING COMMUNICATIONS**

V.

VERIZON, NEW HAMPSHIRE

MOTION TO AMEND PETITION

NOW COMES Freedom Ring Communications, LLC d/b/a BayRing Communications (hereinafter BayRing) and, pursuant to Admin. Rule Puc 203.10, respectfully moves that it be allowed to amend its Petition in the above-captioned matter to add the assertion that Verizon is improperly assessing access charges to BayRing for calls originated by BayRing end use customers that terminate at end use customers served by carriers other than Verizon. In support of this motion, BayRing states as follows:

1. By Petition dated April 28, 2006, BayRing complained that Verizon, New Hampshire (hereinafter Verizon) was improperly charging BayRing for calls that originate with a BayRing customer and that terminate on a wireless carrier's network.
2. During the course of technical sessions in this proceeding, it was learned that the charges which form the basis of BayRing's complaint (i.e. terminating access charges for calls to wireless carriers' customers) are also being assessed in connection with calls that are originated by BayRing end use customers and that are terminated at end use customers that are not served by Verizon. For example, it was learned that Verizon

charges BayRing (and other CLECs) terminating access for calls originating with a CLEC customer and terminating with another CLEC customer.

3. No procedural schedule has yet been adopted by the Commission.

Accordingly, allowing BayRing to amend its Petition at this juncture will not cause undue delay. In addition, allowing this amendment will encourage the just resolution of the proceeding as it will afford the Commission the opportunity to examine the propriety of all of the access charges imposed by Verizon on calls that BayRing customers make to all end use customers served by carriers other than Verizon.

4. Pursuant to Admin. Rule Puc 203.10 (a) (1) notice of this request will be given to all persons on the service list. In addition, since this request has the effect of broadening the scope of this proceeding, BayRing respectfully requests that the Commission expeditiously provide notice and an opportunity for comment as is required by Admin. Rule Puc 203.10 (b).

WHEREFORE, BayRing respectfully requests that this honorable Commission:

A. Add to BayRing's Petition in this matter the claim that Verizon is improperly charging BayRing for calls that originate with a BayRing end use customer and that do not terminate at a Verizon end use customer.

B. Provide the notice and opportunity for comment required by Admin. Rule Puc 203.10(b) as soon as possible;

C. Grant such further relief as it deems appropriate.

Respectfully submitted

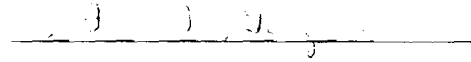
Freedom Ring Communications, LLC
d/b/a BayRing Communications

By their attorneys,

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

By:

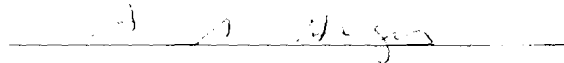
October 5, 2006



Susan S. Geiger

Certificate of Service

I hereby certify that a copy of the foregoing Motion has on this 5th day of October, 2006 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