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June 11, 2013

Via Electronic Mail and Overnight Delivery

Deborah Howland  
Executive Director and Secretary  
NH Public Utilities Commission  
21 Fruit Street, Suite 10  
Concord, NH 03301

RE: DRM 12-036, Rulemaking Puc 400, Rules for Telephone Service

Dear Secretary Howland:



I am writing on behalf of AT&T Corp. and Teleport Communications America, LLC (collectively, "AT&T") regarding the Initial Proposed Rules issued by the Commission on April 11, 2013. Because AT&T's position on many of the proposed rules is similar to that of certain other members of the industry, it will not, at this time, submit lengthy general comments or detailed word changes implementing those comments. Instead, I will simply specify the parties (and comments) with which AT&T agrees.

Specifically, AT&T generally agrees with the comments of Verizon and the New England Cable and Telecommunications Association, Inc. ("NECTA"), arguing that most of the proposed rules would regulate, or have the effect of regulating, VoIP and IP-enabled services in contravention of the plain language of Senate Bill 48 and the Legislature's intent in adopting that bill. AT&T also agrees with the comments of NECTA and Verizon regarding the proposed rules on slamming and cramming (Rules 412.04 and 412.05, respectively). In addition, AT&T agrees with the statements on pages 4-5 of Verizon's comments regarding SB 48's removal of Commission authority over certain aspects of the operations of Excepted Local Exchange Carriers ("ELECs"), including regulation of the network operations procedures of ELECs.

AT&T does offer two changes to the proposed revisions to Puc 415.02 to correct what appear to be typographical errors:

- in Puc 415.02(b), replace "Puc 411.06" with "Puc 411.07"; and
- in Puc 415.02(e), replace "Puc 418.08" with "Puc 416.08."

Six additional copies of this letter are enclosed. Please let me know if you have questions, and thank you for your assistance.

Yours truly,  
  
James A. Huttenhower

cc: Service List (electronic distribution only)

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