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Neil Wheelwright

VIA HAND DELIVERY

May 7, 2007

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



Re: DT 07-027 (Petition of Four TDS Telecom Companies for Alternate Regulation)

John L. Primmer

Dear Ms. Howland:

Enclosed for filing in the above-referenced matter, on behalf of Granite State Telephone, Inc. ("GST"), are an original and eight (8) written copies of the "Petition for Intervention of Granite State Telephone, Inc." and an "Entry of Appearance" by and through the undersigned counsel.

At the Technical Session following last Friday's Prehearing Conference, GST was advised by all parties and potential parties present that there is no objection to GST's intervention motion.

An electronic copy of the foregoing documents has been delivered separately. I have also included an extra written copy of each document. Would you kindly date-stamp these extra copies and return them to my courier?

Thank you for your attention to this matter. Please let me know if you have any questions.

Paul J. Phillips

Very truly yours

Encls.

cc: Attached Service List, Docket No. DT 07-027 (copies e-mailed where shown) Susan Rand King, President, Granite State Telephone, Inc.

421 Summer Street P.O. Box 159 St. Johnsbury, Vermont 05819-0159

State of New Hampshire Before the New Hampshire Public Utilities Commission

DT 07-027

Petition of Kearsarge Telephone Company, Merrimack County Telephone Company, Wilton Telephone Company and Hollis Telephone Company for an Alternate Form of Regulation

ENTRY OF APPEARANCE

Granite State Telephone, Inc., by and through the undersigned counsel and in accordance with New Hampshire Code of Administrative Rules, Part Puc 203.16(a)(2), hereby enters its appearance in the above-captioned proceeding.

DATED at Plymouth, New Hampshire, this 7th day of May, 2007.

Respectfully submitted,

GRANITE STATE TELEPHONE, INC.

By: Primmer Piper Eggleston & Cramer PC,

Its Counsel

By:

Paul J. Phillips, Esq.

Elijah D. Emerson, Esq.

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State of New Hampshire Before the New Hampshire Public Utilities Commission

DT 07-027

Petition of Kearsarge Telephone Company, Merrimack County Telephone Company, Wilton Telephone Company and Hollis Telephone Company for an Alternate Form of Regulation

PETITION FOR INTERVENTION OF GRANITE STATE TELEPHONE, INC.

May 7, 2007

Submitted by:

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Motion to Intervene of Granite State Telephone, Inc. DT 07-027 May 7, 2007 Page 1 of 3

State of New Hampshire Before the New Hampshire Public Utilities Commission

DT 07-027

Petition of Kearsarge Telephone Company, Merrimack County Telephone Company, Wilton Telephone Company and Hollis Telephone Company for an Alternate Form of Regulation

<u>PETITION FOR INTERVENTION OF</u> <u>GRANITE STATE TELEPHONE, INC.</u>

Granite State Telephone, Inc. ("GST"), by and through the undersigned counsel and pursuant to RSA 541-A:32 and N.H. Admin. Rule Puc 203.17, hereby petitions the New Hampshire Public Utilities Commission ("Commission") to grant intervention to GST in the present proceeding.

In support of its Petition, GST states as follows:

- 1. On March 1, 2007, Kearsarge Telephone Company, Wilton Telephone Company, Hollis Telephone Company and Merrimack County Telephone Company (the foregoing, collectively, the "TDS Telecom Companies" or the "Petitioners") each petitioned the Commission, pursuant to RSA 374:3-b, for approval of an alternate form of regulation.
- 2. The applicable statute, RSA 374:3-b, was enacted as of July 21, 2006, and authorizes a "small incumbent local exchange carrier" ("small ILEC") to seek, and the Commission to approve, an alternate form of regulation for such small ILEC.

Motion to Intervene of Granite State Telephone, Inc. DT 07-027

May 7, 2007 Page 2 of 3

3. The Petitioners' petition presents the first opportunity for the Commission to apply

the terms and provisions of RSA 374:3-b in the context of an administrative adjudication.

4. Consideration of the Petitioner's petition is likely to require the Commission to

render legal interpretation(s) of one or more provisions of RSA 374:3-b, both on their face

and as applied to the facts alleged in Petitioners' petitions.

5. The Commission's legal interpretations in this proceeding are likely to involve

both definitions of terms that may not be defined with particularity in the statute and

questions of policy relating to the application of the new statute to particular sets of facts.

6. The Commission's rulings in this Docket are likely to have precedential effect in

subsequent proceedings involving petitions submitted by other qualifying carriers under RSA

374:3-b.

7. As an incumbent local exchange carrier serving fewer than 25,000 access lines,

GST is a qualifying company under RSA 374:3-b.

8. If GST were itself to seek relief under RSA 374:3-b in a subsequent proceeding,

GST may be bound by the legal precedents that may be decided by the Commission in the

present case.

9. For the foregoing reasons, GST has a substantial interest that may be affected by

the present proceeding.

10. The interests of justice and the orderly and prompt conduct of the present

proceeding will not be impaired by allowing the intervention of GST.

Motion to Intervene of Granite State Telephone, Inc. DT 07-027 May 7, 2007

Page 3 of 3

11. GST asserts that it satisfies the requirements or otherwise qualifies as an

intervenor under RSA 541-A:32.

12. On May 4, 2007, the Commission conducted a Prehearing Conference, followed

by a Technical Session led by Commission staff.

13. At the Technical Session, GST advised the Petitioners and all parties and potential

parties present that GST intended to seek intervention in this proceeding, and GST was

advised that there is no objection to GST's intervention.

WHEREFORE Granite State Telephone, Inc., moves the Commission to grant the

aforesaid petition for intervention.

DATED at Plymouth, New Hampshire, this 7th day of May, 2007.

Respectfully submitted,

GRANITE STATE TELEPHONE, INC.

By: PRIMMER PIPER EGGLESTON & CRAMER PC

Paul J. Phillips, Esq.

By:

Elijah D. Emerson, Esq.

Primmer Piper Eggleston & Cramer PC

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State of New Hampshire Before the New Hampshire Public Utilities Commission

Docket No. DT 07-027

Petition of Kearsarge Telephone Company, Merrimack County Telephone Company, Wilton Telephone Company and Hollis Telephone Company for an Alternate Form of Regulation

SERVICE LIST

Original + 8 Copies + E-mail:

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