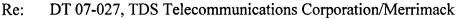
NEW HAMPSHIRE LEGAL ASSISTANCE

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May 15, 2007

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



County Telephone Company Alternative Form of Regulation

Dear Ms. Howland:

Please find enclosed original and eight copies of Petition For Late Intervention on behalf of Ross Patnode. A copy is also being sent by email to the Commission and to all parties listed below. Please note that TDS/MCTC, Staff, OCA and the parties do not object to the late intervention of Mr. Patnode.

Thank you for your attention to this matter.

Sincerely,

Alan Linder

Attorney for Petitioner Ross Patnode

AL:blg Enclosures Cc (w/encl.):

> Frederick Coolbroth, Esquire Anne Ross, Esquire Rorie Hollenberg, Esquire Susan Geiger, Esquire Daniel Feltes, Esquire Ross Patnode

State of New Hampshire Public Utilities Commission

DT 07-027

TDS Telecommunications Corporation/Merrimack County Telephone Company
Alternative Form Of Regulation

Petition For Late Intervention

Petitioner, Ross Patnode, moves for late intervention in this proceeding, pursuant to Rule Puc 203.17 and RSA 541-A:32, II, and states as follows:

- 1. Petitioner, Ross Patnode, resides in Hillsborough, New Hampshire.
- Petitioner is a residential customer of TDS Telecom/Merrimack County Telephone
 Company (MCTC), a wholly-owned subsidiary of TDS Telecommunications Corporation (TDS Telecom).
- 3. Petitioner has a limited income, and he and the members of his household will be affected by an increase in TDS Telecom/MCTC's residential basic local exchange rates.
- 4. Petitioner has an interest in this proceeding as a residential customer of TDS Telecom/MCTC.
 - 5. Petitioner does not have access to competitive basic local exchange service.
 - 6. Petitioner seeks to assure universal access to affordable basic service.
- 7. The rights, duties, privileges, and other substantial interest of Petitioner may be affected by this proceeding.
 - 8. Petitioner seeks to intervene as a full party intervenor in this proceeding.
- 9. Petitioner agrees to be bound by all protective orders with respect to treatment of confidential information and documents.
- 10. Petitioner is aware that this petition is being filed after the May 1, 2007 deadline for filing for intervention as set forth in the Order of Notice dated April 10, 2007.

11. Petitioner agrees to abide by the procedural schedule set by the Commission for this

proceeding.

12. The granting of this Petition for Late Intervention is in the interest of justice, will not

impair the orderly and prompt conduct of this proceeding, will not result in delay, and will not

prejudice the interest of any party.

13. Counsel for Petitioner contacted counsel for TDS Telecom/MCTC, counsel for Staff,

the OCA and all parties to this proceeding. Counsel for TDS Telecom/MCTC, counsel for Staff,

the OCA and other parties do not object to this late petition for intervention. Counsel for TDS

Telecom/MCTC reserves the right, however, to object with regard to standing to the extent issues

arise that are unique to a company or an exchange that does not serve Petitioner Ross Patnode.

WHEREFORE, Petitioner, Ross Patnode, requests that the Commission grant him leave

to intervene as a full party intervenor in this proceeding.

Respectfully submitted Ross Patnode, Petitioner

By His Attorney

Alan Linder

New Hampshire Legal Assistance

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Daniel Feltes

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154 High Street

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Portsmouth, NH 03802-0778

Telephone: 603-431-7411

dfeltes@nhla.org

<u>5/15/07</u> Date

Certification of Service

I certify that on this date I mailed and emailed a copy of the within Petition to Frederick Coolbroth, counsel for TDS Telecom/MCTC, Anne Ross, counsel for Staff of the Commission, Rorie Hollenberg, Office of the Consumer Advocate, and Susan Geiger, counsel for Intervenor, segTel.

Date: <u>5//5/0</u>7

Alan Linder

Attorney for Petitioner