

Exhibit TDS-1

TDS Telecom (New Hampshire)
Balance Due by Operating Company from Global NAPs, Inc.
As of September 19, 2008

Company	Total
Contoocook Valley Telephone Company	\$ 14,027.03
Hollis Telephone Company	\$ 28,736.35
Kearsarge Telephone Company	\$ 146,532.21
Merrimack County Telephone Company	\$ 87,441.93
Wilton Telephone Company	\$ 48,561.22
TOTAL	\$ 325,298.74

Exhibit TDS-2

I. STIPULATED FACTS

1. Global NAPs Inc. is certified as a Competitive Local Exchange Carrier (“CLEC”) in New Hampshire by Order No. 22,976, dated July 8, 1998.
2. Global NAPs Inc., Global Naps Networks, Inc., Global NAPs Realty, Inc. and Global NAPs New Hampshire, Inc. (collectively "Global NAPs") combine to provide services in New Hampshire.
3. There is no annual report or assessment report for Global NAPs, Inc., on file at the NHPUC for 2005, 2006 and 2007.
4. Global NAPs, Inc. is not a registered CTP in the State of New Hampshire.
5. Global Naps Networks, Inc., Global NAPs Realty, Inc. and Global NAPs New Hampshire, Inc., are not certified as CLECs or as CTPs in New Hampshire.
6. To Global NAPs’ knowledge, no separate check has been paid to Verizon or FairPoint for invoiced transit traffic charges.
7. Transit traffic charges from Verizon and FairPoint to Global NAPs Inc. and Global NAPs Inc. charges to Verizon and FairPoint for reciprocal compensation are in dispute and are currently being litigated in the United States District Court for the Eastern District of New York.
8. Global NAPs does not provide dial tone service to any customer in New Hampshire.
9. Global NAPs terminates calls for Voice over Internet Protocol (“VoIP”) providers.

10. Global NAPs Inc. delivers calls to Internet Service Providers ("ISPs") and e-fax service providers.

11. Global NAPs customers represent in their contracts with Global NAPs that they are Enhanced Service Providers ("ESPs"); however, Global NAPs has not independently verified and does not independently verify the nature of the traffic being delivered to the Global NAPs affiliated companies.

12. Global NAPs has three gateways. It can accept, switch and/or terminate traffic in time division multiplexing ("TDM"), asynchronous transfer mode ("ATM") or Internet protocol ("IP") formats.

13. Global NAPs does not know the original format of the traffic it receives.

14. Global NAPs does not distinguish the format of the traffic it receives.

15. Traffic received by Global NAPs that is not in ATM format is converted to ATM format by Global NAPs.

16. Global NAPs Networks, Inc., carries traffic on its network in ATM format and converts the format to TDM for termination on the public switched network.

17. Global NAPs Networks, Inc., transfers all traffic at issue in this proceeding to FairPoint-NNE in traditional TDM format at the FairPoint-NNE tandem in Manchester, New Hampshire.

18. FairPoint-NNE terminates the traffic at issue in this proceeding the same way it terminates a traditional voice call, that is, through meet point billing with the Independent ILEC.

19. The Global NAPs operating carrier number ("OCN") is 4976 in New Hampshire, 4975 in New York and 7755 in Massachusetts.

20. The Industry Numbering Committee Company Code Assignment Guidelines state: An Operating Company Number (OCN) is a four-character numeric or alphanumeric code that uniquely identifies a provider of local telecommunications service in accordance with the ANSI T1.251 industry standard.

21. TDS receives industry standard call detail records ("CDRs") from FairPoint-NNE showing traffic with OCN 4975.

22. The Global NAPs Carrier Identification Code ("CIC") is 5133.

23. CICs are 4-digit numeric codes which are currently used to uniquely identify local exchange carriers ("LECs"), carriers who purchase access services, and Billing and Collections Clearinghouses that provide third-party bill aggregation services on behalf of access purchasers. These codes are primarily used for routing from the local exchange network to the access purchaser and for billing between the LEC and the access purchaser.

II. MISCELLANEOUS

24. Parties agree that all discovery responses and exhibits attached thereto shall be admitted into evidence without further hearing.

25. This Stipulation may be executed in multiple counterparts, which together shall constitute one agreement.

WHEREFORE, the undersigned Stipulating Parties offer this Stipulation for the reasons and purposes stated herein.

DATED as of the date first above written.

Hollis Telephone Company, Inc., Kearsarge Telephone
Company, Inc., Merrimack County Telephone
Company, and Wilton Telephone Company, Inc.

BY: Primmer Piper Eggleston & Cramer PC, Their Attorneys

BY: _____
Paul J. Phillips

Global NAPs, Inc.

By: _____
James R. J. Scheltema

Granite State Telephone, Inc., Dunbarton Telephone
Company, Inc., Northland Telephone Company of
Maine, Inc., d/b/a FairPoint Communications, Bretton
Woods Telephone Company, Inc., and Dixville
Telephone Company

By: Devine, Millimet & Branch, P.A., Their Attorneys

By: _____
Frederick J. Coolbroth

Union Telephone Company d/b/a Union
Communications

By: _____
Jasper Thayer

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

By: _____
Ben Thayer

Northern New England Telephone Operations LLC
d/b/a FairPoint Communications-NNE

By: Devine, Millimet & Branch, P.A., Their Attorneys

By: _____
Patrick C. McHugh

Exhibit TDS-3

**TDS Telecom
State of New Hampshire
NHPUC DT 08-028**

Respondent: Thomas M. McCabe
Title: Manager, State Gov't Affairs
Date of Response: June 6, 2008

Request By: NHPUC Staff

Request Date: May 23, 2008

Request: Staff-TDS-1-1

Please provide support that shows how TDS Telecom computed the terminating intrastate access charge on one of the bills that make up the purported outstanding balance owed of \$192,644.25. Please tie the calculation to tariff rates filed with the Commission.

Response:

Please see the "Attachment to Staff-TDS-1-1" attached hereto and made a part hereof.

The attachment consists of two (2) parts, relating to charges invoiced in January 2008 by Wilton Telephone Company, Inc. ("Wilton"), to Global NAPs, Inc. ("GNAPs"), as follows:

- **Part A** is a spreadsheet showing the access charges, access minutes of use and billed access rates that were invoiced by Wilton to GNAPs for the January 2008 billing cycle. The CIC Code (5133) refers to GNAPs. The total access charges for January 2008 from Wilton to GNAPs were \$1,275.68. Columns "I" and "J" of the spreadsheet show the applicable rates from Wilton's interstate and New Hampshire tariffs.
- **Part B** shows the applicable tariff pages from Wilton's interstate tariff (NECA Tariff No. 5, on file with the Federal Communications Commission) and Wilton's New Hampshire tariff (NHPUC No. 6), on file with the NHPUC. The respective tariff pages show the access rates applicable to the corresponding access usage items on Part A.

**TDS Telecom
State of New Hampshire
NHPUC DT 08-028**

Respondent: Thomas M. McCabe
Title: Manager, State Gov't Affairs
Date of Response: June 6, 2008

Request By: NHPUC Staff

Request Date: May 23, 2008

Request: Staff-TDS-1-2

Please provide a sample of toll data records that identify GNAPs' customers as originators of calls that terminate with TDS Telecom end users.

Response:

Please see the "Confidential Attachment to Staff-TDS-1-2," attached hereto and made a part hereof.

The attachment consists of five (5) call detail records ("CDRs"), showing traffic on Saturday, March 8, 2008, that was terminated by CIC 5133 (assigned to GNAPs) to each of the following entities: Contoocook Telephone Company, Inc., Hollis Telephone Company, Inc., Kearsarge Telephone Company, Merrimack County Telephone Company and Wilton Telephone Company, Inc.

**TDS Telecom
State of New Hampshire
NHPUC DT 08-028**

Respondent: Thomas M. McCabe
Title: Manager, State Gov't Affairs
Date of Response: June 6, 2008

Request By: NHPUC Staff

Request Date: May 23, 2008

Request: Staff-TDS-1-3

Based on TDS Telecoms' toll data records, were there any GNAPs customer-originated calls that terminated with an ISP served by TDS Telecom?

Response:

No. To the best of TDS Telecom's knowledge there are no access records indicating that any of the traffic at issue here terminated with an Internet Service Srovider ("ISP") served by TDS Telecom in New Hampshire. As indicated in the Response to Staff-TDS-1-4, there are only two ISPs presently served by TDS Telecom in New Hampshire: TDS.net and IamNet, Inc. TDS.net is the dial-up ISP operated by the Joint Petitioners' parent company, TDS Telecom. TDS.net is offered only to customers of each Joint Petitioner within such Joint Petitioner's service area, so that end-user customers can reach TDS.net by means of a local (7-digit) number.

IamNet, Inc. (www.iamnow.net) is a small, independent ISP operating in the Bradford and Henniker exchanges of Merrimack County Telephone Company. From the data attached to the Response to Staff-TDS-1-2, there is no indication that any of the traffic terminated to the local (7-digit) numbers that customers use to access IamNet's service.

**TDS Telecom
State of New Hampshire
NHPUC DT 08-028**

Respondent: Thomas M. McCabe
Title: Manager, State Gov't Affairs
Date of Response: June 6, 2008

Request By: NHPUC Staff

Request Date: May 23, 2008

Request: Staff-TDS-1-4

Please list all TDS Telecom customers that are ISP providers.

Response:

1. TDS.net
2. IamNet, Inc. (www.iamnow.net)

**TDS Telecom
State of New Hampshire
NHPUC DT 08-028**

Respondent: Thomas M. McCabe
Title: Manager, State Gov't Affairs
Date of Response: June 6, 2008

Request By: NHPUC Staff

Request Date: May 23, 2008

Request: Staff-TDS-1-5

Please submit all correspondences between GNAPs and TDS Telecom, including emails, letter, faxes, and otherwise, regarding TDS Telecoms' collection efforts to recover terminating intrastate access charges at issue in the instant docket.

Response:

Please see the "Attachment to Staff-TDS-1-5," attached hereto and made a part hereof.

In addition to the monthly invoices sent by each Joint Petitioner to GNAPs (not included here) and telephone calls made from time to time between employees of TDS Telecom and employees of GNAPs, the attached documents represent, to the best of TDS Telecom's knowledge, the documentary record of TDS Telecom's efforts to recover the charges at issue in this proceeding. TDS Telecom reserves the right to supplement the present Response as additional documents are located.

Exhibit TDS-4

State of New Hampshire
Before the New Hampshire Public Utilities Commission

DT 08-028

Joint Petition of Hollis Telephone Company, Inc., Kearsarge Telephone Company, Merrimack County Telephone Company, and Wilton Telephone Company, Inc., for Authority to Block the Termination of Traffic from Global NAPS, Inc., to Exchanges of the Joint Petitioners in the Public Switched Telephone Network

GLOBAL NAPS, INC.'S RESPONSES TO
INDEPENDENT'S FIRST SET OF INTERROGATORIES
FROM THE NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION STAFF

Global NAPS, Inc. ("Global") by counsel submits the following responses and objections to Interrogatories propounded by Staff of the New Hampshire Public Utilities Commission.

GENERAL OBJECTIONS APPLICABLE TO ALL REQUESTS

1. Global objects to these Requests to the extent that they purport to call for the production, identification or disclosure of information or documents protected by the attorney-client or other privileges, information or documents protected by the work-product doctrine, or information or documents protected as trial preparation material.
2. Global objects to these Requests to the extent that the definitions and instructions used by GNAPS in its Requests do not comply with the applicable Federal Rules and/or the Discovery Order issued in this docket.

SPECIFIC OBJECTIONS

1. Global objects to these Requests to the extent they appear to call for the production of confidential, company proprietary, customer proprietary information or other competitively sensitive information. Global may consider production of confidential material if the parties can agree on an appropriate confidentiality stipulation or order.
2. Global objects to these Requests to the extent that they call for the production of documents beyond the requirements of the applicable New Hampshire Law/Rules, or for documents not within the possession, custody or control of Global NAPs, Inc.
3. Global objects to these Requests to the extent that they call for Global to produce information or documents that are either publicly available or that are already in the possession, custody or control of the Commission.
4. Global objects to these Requests to the extent that they are overly broad and unduly burdensome.
5. Global objects to these Requests to the extent that they seek information not relevant to the dispute between the parties and not reasonably calculated to lead to the discovery of admissible evidence.
6. Global objects to these Requests to the extent that they seek to have Global create documents not in existence at the time of the Requests.
7. Global objects to these Requests to the extent they are not limited in geographical scope to New Hampshire.

8. Global objects to these Requests to the extent they request information regarding entities, namely affiliates that are neither a party to this proceeding nor regulated by this Commission.

9. Global objects to these Requests to the extent they are not limited in temporal scope.

Data Requests

1. For the following two scenarios, please prepare a diagram and describe how a call is routed from the customer of a VoIP carrier originating a call (where the VoIP carrier is a customer of GNAPs) and terminating to a TDS Telecom's end user. In your response, please identify the format of the call at each segment of the path (for example, internet protocol (IP) or time division multiplex (TDM) and identify the points where the format of the call is converted.
 - a. Call originating with a VoIP customer in Pensacola, Florida and terminating to a Merrimack County Telephone customer.
 - b. Call originating with a VoIP customer in Manchester, NH and terminating to a Merrimack County Telephone customer.

Response:

A diagram was provided at the prior hearing. Because the origin of the call for Global is from the Internet cloud, *i.e.*, from its ESP customers, the point of origin would not alter the diagram of scenario a compared to scenario b.

The format of the call is also reflected on such diagram. The call is translated to ATM for transport by Global on Global's network but is then forced to be translated to TDM by the ILEC, in this instance Fairpoint (fka Verizon).

2. Please explain why the rating and routing of New Hampshire NXXs does not apply to GNAPs. Please provide any and all relevant decisions or other authority supporting your explanation.

Response:

The question is vague. However, it should be clear from the decisions distributed previously that access charges are not assessed on ESP traffic (Vonage NE); that the FCC retains jurisdiction over this interstate traffic (Vonage 8th Cir.); that it would be impossible to determine an appropriate measurement upon which to assess access (Vonage NE); Global's traffic is ESP and majority nomadic (NY TVC); and, that the correlation of geographic rate centers to Internet-enabled traffic/ESP traffic, and especially to nomadic traffic, is meaningless for determining rates.

3. Does GNAPs provide VoIP telephony service to end users, or does GNAPs only carry VoIP-based traffic for VoIP providers?

Response:

GNAPs does not provide end-user VoIP services to customers other than ESPs.

4. Please provide usage data, billing information, SS7 data, or other evidence that supports each of the statements listed below, made by GNAPs in its March 14 Answer to Joint Petition, at paragraph 14.
 - a. "Global exchanges traffic which is exclusively interstate in nature."
 - b. "Traffic originating from TDS companies is in-bound ISP traffic..."
 - c. "...traffic terminating to TDS is Enhanced Service Provider traffic."

Response:

Because GNAPs does not render bills based on minutes of use, its usage data and billing information is limited. However, upon execution of a confidentiality agreement, GNAPs will provide Staff with a customer list which will indicate that all our customers are either ISPs or ESPs.

5. GNAPs made the following statement in its March 14 Answer to Joint Petition, at paragraph 20:

"...To the best of my knowledge and understanding, no traffic has been delivered to a TDS company by Global NAPs, Inc."

It appears that this conflicts with GNAPs' statement at paragraph 14:
"...traffic terminating to TDS is Enhanced Service Provider traffic."

Please reconcile the two statements.

Response:

GNAPs is not interconnected with any TDS company in New Hampshire. All traffic that it delivers to Fairpoint is Enhanced Service Provider traffic.

6. Does GNAPs deliver IP-based VoIP traffic to the Fairpoint tandem and if not, explain why?

Response:

Yes, see response to number 5.

- 7. Please identify the location of GNAPs' equipment used to convert its customers' IP-based VoIP traffic from IP format to TDM format before delivering the traffic to the Fairpoint tandem nearest to GNAPs' New Hampshire location**

Response:

GNAPs converts customer traffic at its Quincy, Mass location before delivering same to Fairpoint.

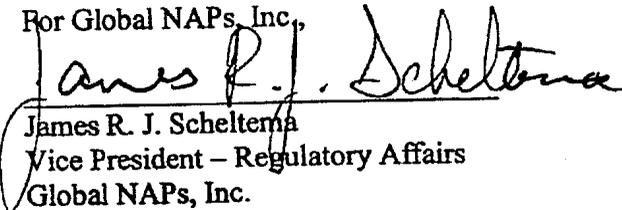
- 8. Please identify whether the traffic GNAPs hands-off at the Fairpoint tandem for termination to a TDS end user is data or voice traffic.**

Response:

Global does not perform such analysis. It merely carries the traffic over its packet-switched network.

June 6, 2008

For Global NAPs, Inc.


James R. J. Scheltema
Vice President – Regulatory Affairs
Global NAPs, Inc.
4475 Woodbine Road
Suite 7
Pace, FL 32571

DT 08-028

Joint Petition of Hollis Telephone Company, Inc., Kearsarge Telephone Company, Merrimack County Telephone Company, and Wilton Telephone Company, Inc., for Authority to Block the Termination of Traffic from Global NAPs, Inc., to Exchanges of the Joint Petitioners in the Public Switched Telephone Network

Global NAPs, Inc. ("Global") by counsel submits the following responses and objections to Interrogatories ("Interrogatories") propounded by Hollis Telephone Company, Inc, Kearsarge Telephone Company, Merrimack County Telephone Company, and Wilton Telephone Company, Inc. ("TDS" or the "Independents").

GENERAL OBJECTIONS APPLICABLE TO ALL INTERROGATORIES

1. Global objects to these Interrogatories to the extent that they purport to call for the production, identification or disclosure of information or documents protected by the attorney-client or other privileges, information or documents protected by the work-product doctrine, or information or documents protected as trial preparation material.
2. Global objects to these Interrogatories to the extent that the definitions and instructions used by GNAPs in its Interrogatories do not comply with the applicable Federal Rules and/or the Discovery Order issued in this docket.

SPECIFIC OBJECTIONS

1. Global objects to these Interrogatories to the extent they appear to call for the production of confidential, company proprietary, customer proprietary information or other competitively sensitive information. Global may consider production of confidential material if the parties can agree on an appropriate confidentiality stipulation or order.
2. Global objects to these Interrogatories to the extent that they call for the production of documents beyond the requirements of the applicable New Hampshire Law/Rules, or for documents not within the possession, custody or control of Global NAPs, Inc.
3. Global objects to these Interrogatories to the extent that they call for Global to produce information or documents that are either publicly available or that are already in the possession, custody or control of the Commission.
4. Global objects to these Interrogatories to the extent that they are overly broad and unduly burdensome.
5. Global objects to these Interrogatories to the extent that they seek information not relevant to the dispute between the parties and not reasonably calculated to lead to the discovery of admissible evidence.
6. Global objects to these Interrogatories to the extent that they seek to have Global create documents not in existence at the time of the Interrogatories.
7. Global objects to these Interrogatories to the extent they are not limited in geographical scope to New Hampshire.

8. Global objects to these Interrogatories to the extent they request information regarding entities, namely affiliates that are neither a party to this proceeding nor regulated by this Commission.

9. Global objects to these Interrogatories to the extent they are not limited in temporal scope.

INTERROGATORIES

- TDS:Global-1:** With reference to the diagram attached hereto as Exhibit TDS-1 (originally circulated by counsel for GNAPs at the NHPUC Technical Session held on May 15, 2008), please define the term "Enhanced Service Provider" ("ESP"), as that term is used on the diagram, and explain how each supposed "ESP [that] connects to GNAPs" (as that term is used on the diagram) satisfies such definition.
- Reply:** Each ESP customer is self-certified and has attested to its ESP status in a contract with Global NAPs, Inc. It is these same contracts, and same customers, which gave rise to the New York Public Service Commission's determination that Global's traffic was VoIP and substantially nomadic. Please refer to the case distributed previously at the Session of May 15, 2008.
- TDS:Global-2:** Please identify the facts and criteria that GNAPs relies upon to establish the status that an ESP is exempt from the payment of terminating access charges for traffic that originates in time division multiplexing ("TDM").
- Reply:** Global makes no such determination independently, nor could it because Global does not know the format in which traffic is originated. Instead it relies on its customers' affirmations regarding the traffic which is buttressed by court determinations such as that relating to Transcom.
- TDS:Global-3:** Please confirm whether all traffic that GNAPs receives from a GNAPs customer requires a broadband connection from the customer's end user to the GNAPs customer.
- Reply:** Global can not do so; the call path behind it's ESP customer(s) is opaque to Global. Notwithstanding, there is no particular requirement Global is aware of which determines that a broadband connection is required for traffic to be enhanced.
- TDS:Global-4:** Please confirm whether all end users sending traffic to a customer of GNAPs require specialized customer premises equipment ("CPE") (such as that required for converting communications to or from Internet Protocol) from the customer's end user location to the location of the GNAPs' customer.
- Reply:** Global can not do so; the call path behind it's ESP customer(s) is opaque to Global. Global provides gateways over which the traffic is exchanged and this may be, for example, in ATM or Internet Protocol.
- TDS:Global-5:** Please confirm whether all customers of GNAPs sending traffic to GNAPs require specialized customer premises equipment ("CPE") (such as that

required for converting communications to or from Internet Protocol) from the customer's location to the location where the customer delivers traffic to GNAPs'.

Reply: Global's switch can accept traffic delivered to it in any of the more commonly recognized formats. As such, the type of equipment that it deploys is an independent choice of the ESP and not dependent on Global's network architecture.

TDS:Global-6: Please identify all carriers, by type (including, without limitation, interexchange carriers (IXCs), incumbent local exchange carriers (ILECs), competitive local exchange carriers (CLECs), and commercial mobile radio service providers (CMRS)), that have sent or currently send traffic to GNAPs that GNAPs delivers over local interconnection trunks and/or any other type of interconnection arrangement (such as, without limitation, Primary Rate Interface (PRI) circuits) to the FairPoint (formerly Verizon) tandem.

Reply: Global objects to the vagueness of the question with respect to the time period at issue. Notwithstanding, Global currently only provides terminating services exclusively to enhanced service providers – not to IXCs, ILECs, CLECs, or CMRS.

TDS:Global-7: Please provide a diagram that illustrates and displays the complete corporate structure of Global NAPs, Inc. and its relation to any and all affiliates and subsidiaries; **OR**, if no such diagram is available, please provide a narrative description of the aforesaid corporate structure that includes, without limitation, an explanation of the relationship of each affiliate and subsidiary to Global NAPs, Inc.

Reply: Global objects on the basis of relevancy. Neither its corporate organization nor that of TDS is relevant to the issue of whether or not traffic is subject to access charges.

TDS:Global-8: Please identify by tribunal or court name, case name, and docket number, any and all complaints, petitions for regulatory action or relief, lawsuits or other causes of action filed to-date in any state or federal court and/or with any state or federal administrative agency, alleging non-payment by Global NAPs, Inc., for any service.

Reply: Global objects on the basis of relevancy. Moreover, this request is burdensome. To the extent there is a proceeding, such would be a matter of public record, but without further definition, there is an insufficient tie between a non-identified proceeding to cause it to be relevant to the issue of whether or not traffic is subject to access charges.

TDS:Global-9: Please identify any and all judgments entered against GNAPs or any of its affiliates by any state or federal administrative agency or state or federal court, and state the mandate of such judgments, including, without limitation, the dollar amounts of any monetary awards and/or whether such judgments resulted in the limitation or revocation of the operating authority of GNAPs or any of its affiliates or the disconnection of services offered by GNAPs or any of its affiliates.

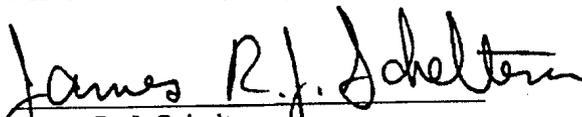
Reply: Global objects on the basis of relevancy. Neither its corporate organization nor that of TDS is relevant to the issue of whether or not traffic is subject to access charges. Notwithstanding, any orders and judgments would be a matter of public record.

TDS:Global-10: Please provide one copy each of the 2007 CLEC-2 Assessment Report and the 2007 CLEC-3 Annual Report as filed by GNAPs with the Commission in compliance with N.H. Admin. Rules Puc 431.09(a), Puc 431.10(a), Puc 434.03(b)(2) and Puc 434.03(b)(3).

Reply: Global objects on the basis of relevancy. Neither its corporate organization nor that of TDS is relevant to the issue of whether or not traffic is subject to access charges. Notwithstanding, any orders and judgments would be a matter of public record.

June 6, 2008

For Global NAPs, Inc.,



James R. J. Scheltema
Vice President – Regulatory Affairs
Global NAPs, Inc.
4475 Woodbine Road
Suite 7
Pace, FL 32571

State of New Hampshire
Before the New Hampshire Public Utilities Commission

DT 08-028

Joint Petition of Hollis Telephone Company, Inc., Kearsarge Telephone Company, Merrimack County Telephone Company, and Wilton Telephone Company, Inc., for Authority to Block the Termination of Traffic from Global NAPs, Inc., to Exchanges of the Joint Petitioners in the Public Switched Telephone Network

**GLOBAL NAPs, INC.'S RESPONSES TO
INDEPENDENT'S FIRST SET OF INTERROGATORIES**

Global NAPs, Inc. ("Global") by counsel submits the following responses and objections to Interrogatories ("Interrogatories") propounded by Hollis Telephone Company, Inc, Kearsarge Telephone Company, Merrimack County Telephone Company, and Wilton Telephone Company, Inc. ("TDS" or the "Independents").

GENERAL OBJECTIONS APPLICABLE TO ALL INTERROGATORIES

1. Global objects to these Interrogatories to the extent that they purport to call for the production, identification or disclosure of information or documents protected by the attorney-client or other privileges, information or documents protected by the work-product doctrine, or information or documents protected as trial preparation material.
2. Global objects to these Interrogatories to the extent that the definitions and instructions used by GNAPs in its Interrogatories do not comply with the applicable Federal Rules and/or the Discovery Order issued in this docket.

SPECIFIC OBJECTIONS

1. Global objects to these Interrogatories to the extent they appear to call for the production of confidential, company proprietary, customer proprietary information or other competitively sensitive information. Global may consider production of confidential material if the parties can agree on an appropriate confidentiality stipulation or order.
2. Global objects to these Interrogatories to the extent that they call for the production of documents beyond the requirements of the applicable New Hampshire Law/Rules, or for documents not within the possession, custody or control of Global NAPs, Inc.
3. Global objects to these Interrogatories to the extent that they call for Global to produce information or documents that are either publicly available or that are already in the possession, custody or control of the Commission.
4. Global objects to these Interrogatories to the extent that they are overly broad and unduly burdensome.
5. Global objects to these Interrogatories to the extent that they seek information not relevant to the dispute between the parties and not reasonably calculated to lead to the discovery of admissible evidence.
6. Global objects to these Interrogatories to the extent that they seek to have Global create documents not in existence at the time of the Interrogatories.
7. Global objects to these Interrogatories to the extent they are not limited in geographical scope to New Hampshire.

8. Global objects to these Interrogatories to the extent they request information regarding entities, namely affiliates that are neither a party to this proceeding nor regulated by this Commission.

9. Global objects to these Interrogatories to the extent they are not limited in temporal scope.

INTERROGATORIES

NHTA 1. Please provide a copy of the interconnection agreement that GNAPs has with Verizon New England, Inc. d/b/a Verizon-New Hampshire, as predecessor-in-interest to Northern New England Telephone Operations LLC, d/b/a FairPoint Communications-NNE ("FairPoint") or provide a copy of the interconnection agreement or other agreement that GNAPs has with FairPoint for the exchange of traffic in New Hampshire.

RESPONSE:

Please see the attached a copy of the Agreement by and between Global NAPs, Inc. and Verizon New England Inc., d/b/a Verizon New Hampshire, f/k/a New England Telephone and Telegraph Company, d/b/a Bell Atlantic - New Hampshire for the State of New Hampshire.

NHTA 2. At the point where traffic from GNAPs is converted to Time Division Multiplexing ("TDM") and handed off to FairPoint's switches in New Hampshire, please itemize each separate charge that GNAPs is invoiced for its use of the FairPoint network and state in each case whether or not GNAPs pays the invoiced charge.

RESPONSE:

Please see the attached spreadsheet indicating the charges being assessed against GNAPs.

NHTA 3. In Paragraph 1 of GNAPs' Answer to the Joint Petition, GNAPs states: "Global reserves the right to amend, add or delete portions of this Answer or affirmative defenses resulting from information provided by FDN through investigation and discovery." Please identify and define the term "FDN".

RESPONSE:

This was a typographical error. The sentence should have read TDS where it shows FDN. However, FDN refers to Florida Digital Networks, Inc. which filed a similar case which I have provided to counsel and the Commission and was referenced in Global's opening statement for the purpose of showing the Judge's ruling deferring a decision on applying intrastate access rates on Global's traffic until such time as the FCC makes further rulings.

June 6, 2008

For Global NAPs, Inc.,

James R. J. Scheltema

James R. J. Scheltema
Vice President – Regulatory Affairs
Global NAPs, Inc.
4475 Woodbine Road
Suite 7
Pace, FL 32571

AGREEMENT

by and between

GLOBAL NAPS, INC.

and

**VERIZON NEW ENGLAND INC., d/b/a VERIZON NEW HAMPSHIRE, f/k/a NEW ENGLAND
TELEPHONE AND TELEGRAPH COMPANY, d/b/a BELL ATLANTIC - NEW HAMPSHIRE**

FOR THE STATE OF

NEW HAMPSHIRE

7.3.8 Reciprocal Compensation shall not apply to Virtual Foreign Exchange Traffic (i.e., V/FX Traffic), defined for use in this Agreement as calls in which a GNAPs Customer is assigned a telephone number with an NXX Code (as set forth in the LERG) associated with an exchange that is different than the exchange (as set forth in the LERG) associated with the actual physical location of such Customer's station, except as provided in the next sentence. Pursuant to the Arbitration Order and the Final Order, Order No. 24,080, in DT 00-223 and 00-054 dated October 28, 2002 ("Generic Order") to the extent that the Generic Order remains Applicable Law, and for purposes of this Agreement only, Reciprocal Compensation shall apply (and access charges shall not apply to) to non-Internet traffic originated by Verizon to a GNAPs V/FX number if GNAPs is providing facilities-based local dial-tone service (as specified in the Arbitration and Generic Orders) to, and has certified to the Commission that it is providing such service to, at least one Customer physically located in the Verizon exchange in New Hampshire to which the called number is rated, as reflected in the LERG. For the avoidance of any doubt, and except as provided in the previous sentence, GNAPs shall pay Verizon's originating access charges for all V/FX Traffic originated by a Verizon Customer, and GNAPs shall pay Verizon's terminating access charges for all V/FX Traffic originated by a GNAPs Customer.

7.4 The Reciprocal Compensation rates (including, but not limited to, the Reciprocal Compensation per minute of use charges) billed by GNAPS to Verizon shall not exceed the Reciprocal Compensation rates (including, but not limited to, Reciprocal Compensation per minute of use charges) billed by Verizon to GNAPS.

8. Other Types of Traffic

- 8.1 Notwithstanding any other provision of this Agreement or any Tariff: (a) the Parties' rights and obligations with respect to any intercarrier compensation that may be due in connection with their exchange of Internet Traffic shall be governed by the terms of the FCC Internet Order and other applicable FCC orders and FCC Regulations; and, (b) a Party shall not be obligated to pay any intercarrier compensation for Internet Traffic that is in excess of the intercarrier compensation for Internet Traffic that such Party is required to pay under the FCC Internet Order and other applicable FCC orders and FCC Regulations.
- 8.2 Subject to Section 8.1 above, interstate and intrastate Exchange Access, information access, exchange services for Exchange Access or information access, and Toll Traffic, shall be governed by the applicable provisions of this Agreement and applicable Tariffs.
- 8.3 For any traffic originating with a third party carrier and delivered by GNAPS to Verizon, GNAPS shall pay Verizon the same amount that such third party carrier would have been obligated to pay Verizon for termination of that traffic at the location the traffic is delivered to Verizon by GNAPS.
- 8.4 Any traffic not specifically addressed in this Agreement shall be treated as required by the applicable Tariff of the Party transporting and/or terminating the traffic.