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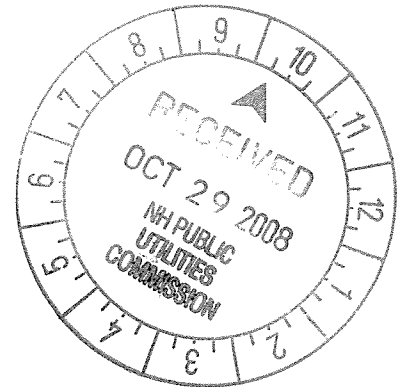
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October 27, 2008

BY VIA FIRST CLASS POSTAGE
CERTIFIED RETURN RECEIPT REQUESTED
AND FEDERAL EXPRESS

Debra A. Howland
Executive Director & Secretary
N.H. Public Utilities Commission
21 S. Fruit St., Suite 10
Concord, NH 03301-2429



Re: DT 08-028, TDS Telecom Companies
Petition for Authority to Block Termination of Traffic from Global NAPs

Dear Ms. Howland:

I am writing this letter in response to Order No. 24,907. That Order has three (3) ordering paragraphs requiring action by Global NAPs, Inc., as follows:

1. That Global NAPs file with the Commission and the parties to Docket No. DT 08-028 by close of business on October 27, 2008 **audited financial statements for Global NAPs, Inc. for the years 2004 through 2007, including balance sheets, income statements and footnotes;**
2. That Global NAPs resubmit to the Commission by close of business on October 27, 2008 its **2005, 2006 and 2007 complete annual reports with balance sheets and income statements conforming with Puc 449.04,**

including redacted, public versions, if confidential treatment is sought, and unredacted copies under protective agreement to the parties to Docket No. DT 08-028;

3. That Global NAPs submit by close of business on October 27, 2008 an annotated listing of each corporate entity related to Global NAPs' New Hampshire operations and services; such listing shall include full, official corporate names of each entity, names of all officers and any registered agents of each entity, corporate addresses of each entity, and meaningful descriptions of the relationship and function of each entity related to Global NAPs, Inc. and its operations in New Hampshire as depicted in the corporate family structure provided in Global NAPs' original (and re-submitted) response to TDS Data Request 22.

Separately, the Commission provided for a *hearing be scheduled on November 10, 2008 at 10:00 a.m. to hear arguments concerning Global NAPs' motion for confidential treatment* of its annual reports for 2005, 2006 and 2007 and, as appropriate, its audited financial statements for the years 2004 through 2007.

1. Audited Financial Statements

Global has responded previously to this requirement. As it's earlier response indicated, Global does not prepare audited financial reports – it is a privately held concern which has no need for, nor requirements for, audited financial reporting typically required of

publicly listed corporations. Indeed, Global does not even prepare separately stated income statements and balance sheets in the ordinary course of business.

Global is not unwilling to, but is unable to, currently provide the requested audited financial statements to the Commission. Nor does Global believe the Commission has the authority to require audited financial reports. *See* PUC 449.04(g). As was explained to staff counsel, reporting is generally made under tax-driven considerations intended to populate a consolidated income and balance sheet for consolidated income tax returns. Notwithstanding, Global is seeking to have its independent Certified Public Accountant, if he is able to, and if so, as soon as he is able to, provide income and balance sheets for the years requested, which will be forwarded to you as soon as possible.

2. Form CLEC-3 Annual Financial Report(s)

Global has now filed these on at least three separate occasions. It has done so via e-mail, via federal express and via first class mail, return receipt requested. However, to my knowledge, it has not done so in a “redacted” format. As such, attached to this correspondence is a copy of the Form CLEC-3 Annual Financial Report(s) for the years 2005, 2006 & 2007 in redacted form. Further, such reports have been sent to the service list of Docket No. 08-028, as requested in ordering paragraph 2.

3. Response to TDS – 22

The Commission has again requested a response to TDS-22. Global has responded to this request previously on several occasions as well. The following was Global’s first response to the Independents’ request:

TDS:Global-22: Provide provide a diagram of all corporate entities affiliated with Global NAPs, Inc., Global NAPs Realty, Inc., Global NAPs Networks, Inc., Global NAPs New Hampshire, Inc., and Ferrous Miner Holdings, Inc.

Objection: this is beyond the discovery discussed and exceeds that which would reasonably lead to admissible evidence.

FM

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GNI - GNR - GNN - GN-NH

The identities of these corporations was commonly understood, (GNI represents Global NAPs, Inc., GNR represents Global NAPs Realty, Inc., GNN represents Global NAPs Networks, Inc., GN-NH represents Global NAPs New Hampshire, Inc. & FM represents Ferrous Miner Holdings, Ltd.) The affiliations seem clear: each of the four subsidiary corporations is wholly owned by the parent corporation. There is one (1) parent corporation, which is Ferrous Miner Holdings, Ltd. The subsidiary corporations have no subsidiaries themselves. Nor do any of these corporations – or for that matter any person or entity – own any of their stock other than the parent corporation.

Notwithstanding both Global's objection that ownership of affiliate corporations was germane to the issues of the case, nor this response, the Commission is now seeking to enforce compliance with a data request well beyond the request itself!

Specifically, it is requesting "...an annotated listing of each corporate entity related to Global NAPs' New Hampshire operations and services; such listing shall include full, official corporate names of each entity, names of all officers and any registered agents of each entity, corporate addresses of each entity, and meaningful descriptions of the

relationship and function of each entity related to Global NAPs, Inc. and its operations in New Hampshire as depicted in the corporate family structure provided in Global NAPs' original (and re-submitted) response to TDS Data Request 22."

Irrespective of the fact that the response to TDS 22 was both objected to AND responded to fully and completely,

a. Full, official corporate names of each entity:

Global NAPs, Inc., Global NAPs Realty, Inc., Global NAPs Networks, Inc., Global NAPs New Hampshire, Inc., and Ferrous Miner Holdings, Ltd.

b. Names of all officers:

1. Global NAPs, Inc.

Frank T. Gangi, President & Treasurer
Michael Couture, Secretary

2. Global NAPs Realty, Inc.

Frank T. Gangi, President & Treasurer
Michael Couture, Secretary

3. Global NAPs Networks, Inc.

Frank T. Gangi, President & Treasurer
Michael Couture, Secretary

4. Global NAPs New Hampshire, Inc.

Frank T. Gangi, President & Treasurer
Michael Couture, Secretary

5. Ferrous Miner Holdings, Ltd.

Frank T. Gangi, President, Treasurer & Secretary

c. Any registered agents of each entity: (These responses presume the

Commission is asking for a New Hampshire registered agent.)

1. Global NAPs, Inc.

One Sundial Ave.
Suite 219
Manchester, NH 03103

2. Global NAPs Realty, Inc.

One Sundial Ave.
Suite 219
Manchester, NH 03103

3. Global NAPs Networks, Inc.

Global NAPs, Inc.
One Sundial Ave.
Suite 219
Manchester, NH 03103

4. Global NAPs New Hampshire, Inc.

Global NAPs, Inc.
One Sundial Ave.
Suite 219
Manchester, NH 03103

5. Ferrous Miner Holdings, Ltd.

No New Hampshire registered agent.

d. Corporate addresses of each entity:

1. Global NAPs, Inc.

10 Merrymount Road
Quincy, MA 02062

2. Global NAPs Realty, Inc.

10 Merrymount Road
Quincy, MA 02062

3. Global NAPs Networks, Inc.

10 Merrymount Road
Quincy, MA 02062

4. Global NAPs New Hampshire, Inc.

One Sundial Ave.
Suite 219
Manchester, NH 03103

5. Ferrous Miner Holdings, Ltd.

89 Access Road
Suite B
Norwood, MA 02062

e. Meaningful descriptions of the relationship and function of each entity related to Global NAPs, Inc. and its operations in New Hampshire:

Global NAPs, Inc. is the certificated carrier. It maintains an interconnection agreement and is poised to deliver local services when the competitive economic environment allows it to do so profitably. Global NAPs, Inc. provides a host of general and administrative services as well, such as billing, legal, sales, etc. Global NAPs Realty, Inc. is responsible for letting and obtaining space for network facilities within New Hampshire. Global NAPs Networks, Inc. provides the network facilities in New Hampshire that Global NAPs, Inc. uses to exchange communications. Global NAPs New Hampshire, Inc. provides centralized funding services for payroll and other expenses. Ferrous Miner Holdings, Ltd. is a holding company that owns the other entities discussed.

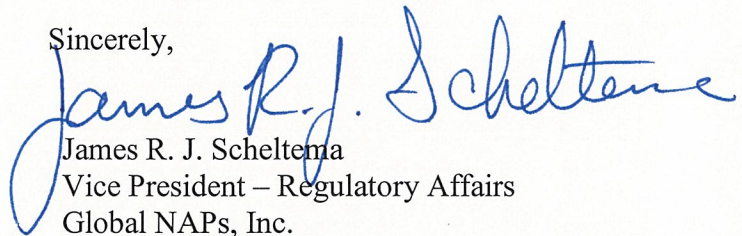
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Finally, with respect to the last paragraph of the Order, i.e., "...a hearing [is] scheduled on November 10, 2008 at 10:00 a.m. to hear arguments concerning Global NAPs' motion for confidential treatment of its annual reports for 2005, 2006 and 2007 and, as appropriate, its audited financial statements for the years 2004 through 2007", Global respectfully requests a deferral of this date. I have a scheduling conflict and, although I have been searching for appropriate counsel in New Hampshire, after contacting seven attorneys, have yet to discover one without a conflict which precludes representation of Global NAPs, Inc.

Thank you for your consideration.

Sincerely,



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Cf/jrs