

**STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION**

RE: Hollis, Kearsarge, Merrimack County, and Wilton Telephone
Companies' Petitions for Authority to Block the Termination
of All Traffic Carried by Global Naps, Inc. to TDS Exchanges

Docket No. DT 08-028

**UNION TELEPHONE COMPANY
PETITION TO INTERVENE**

Union Telephone Company d/b/a Union Communications (Union) hereby respectfully moves that the New Hampshire Public Utilities Commission (Commission) grant Union permission to intervene as a party in the above-captioned proceeding pursuant to Commission rule Puc 203.02(a) and RSA 541-A:32 (I). As set forth more fully below, the Commission should grant Union's request to intervene because the Company may be substantially and directly affected by the Commission's actions in this proceeding.

In support of this Motion, Union states the following:

1. Union is a New Hampshire Corporation that is a public utility as defined in RSA 362:2 and is regulated by the Commission. Union provides telecommunications services to residential and business customers and access services to utilities as defined in RSA 362:2 pursuant to authority granted by the Commission.

2. As a telecommunications provider, Union's rights, duties, and other interests may be affected by this proceeding. The issues raised in the Order of Notice in this proceeding could be significant to Union's future operations and Union has interest in determining that decisions or policies from this docket do not adversely impact Union or its customers.

