

THE STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

DM 12-276

**Northern New England Telephone Operations LLC and Enhanced Communications of
Northern New England, Inc.**

Objection to Public Utility Assessments

PETITION OF AT&T FOR LATE INTERVENTION

AT&T Corp. and TCG New Jersey, Inc. (collectively “AT&T”), hereby request that the Commission allow them to intervene as parties, two days late, in the above-captioned matter, pursuant to RSA 541-A:32, Puc 203.17, and the October 5, 2012 Order of Notice issued by the Commission. The Commission should grant this request because AT&T’s rights, privileges and other interests may be substantially and directly affected by the Commission’s actions in this proceeding. In support of this petition, AT&T states as follows:

1. The Commission initiated this proceeding to address an Objection by Northern New England Telephone Operations LLC and Enhanced Communications of Northern New England, Inc. (collectively “FairPoint”), seeking substantial reductions in the amounts of two public utility assessment invoices issued pursuant to RSA Chapter 363-A. In particular, FairPoint contests whether it should continue to be required to fund expenses of the Office of Consumer Advocate, given the enactment of SB 48, and whether the Commission has statutory authority to levy assessments on FairPoint’s interstate revenues.

2. AT&T Corp. is both a competitive local exchange carrier and a competitive toll provider in New Hampshire and pays annual assessments under RSA Chapter 363-A. TCG New

Jersey, Inc. is a competitive local exchange carrier in New Hampshire and pays annual assessments under RSA Chapter 363-A. The Commission's resolution of FairPoint's Objection may also entitle both AT&T entities to a reduction in their assessments, or it may result in an increase in those assessments. As the Commission remarked in the Order of Notice, "[i]f the assessment of one public utility is reduced, it is possible that the assessments of the remaining public utilities will increase." Order of Notice at 2. Therefore, this proceeding may have a direct effect on AT&T's rights, privileges and interests.

3. AT&T acknowledges filing this petition two days beyond the October 31, 2012, date set in the Order of Notice. AT&T's counsel made a mistake when calendaring the filing deadline, which he did not notice until the evening of October 31. AT&T respectfully requests that this filing be accepted two days late. As this docket is just getting underway, no party should be prejudiced by such a short extension.

4. Given the obvious effect this proceeding could have on AT&T's interests and the lack of prejudice to other parties, AT&T asserts that the interests of justice would be supported, and not impaired, by allowing its intervention two days late.

5. Copies of all pleadings and other materials should be provided to the following:

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WHEREFORE, AT&T requests that the Commission grant its petition for late intervention in this proceeding.

Dated: November 1, 2012

Respectfully submitted,

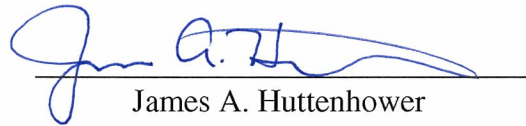
AT&T Corp. and TCG New Jersey, Inc.



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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of November, 2012, a copy of the foregoing Petition of AT&T for Late Intervention was sent by electronic mail to persons named on the service List of this docket.



James A. Huttenhower