



Susan S. Geiger
sgeiger@orr-reno.com
Direct Dial 603.223.9154
Direct Fax 603.223.9054
Admitted in NH and MA

NHPUC AUG07'13 PM 3:10

August 7, 2013

Via Hand Delivery and Electronic Mail

Ms. Debra A. Howland, Executive Director
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301

Re: IR 13-038 – Stakeholder Review of Utility Assessment Practices

Dear Ms. Howland:

This letter is submitted on behalf of New England Cable and Telecommunications Association (“NECTA”) and its members in response to Commission Staff’s Second Revised Straw Proposal for Recommendations to the Commission dated July 30, 2013.

As stated in prior filings made by NECTA in this docket, NECTA supports assessing telecommunications companies based upon 33% of their intrastate revenues. The reasons for NECTA’s position on not including interstate revenues in the assessment calculus are stated in its letter filed February 15, 2013 in this docket, and NECTA expressly incorporates said letter herein by reference. Notwithstanding this position, NECTA remains open to considering Staff’s proposal that telecommunications companies’ assessments be based upon 33% of gross utility revenues, *i.e.* interstate and intrastate revenues. NECTA takes no position with respect to the remaining recommendations contained in Staff’s Second Revised Straw Proposal dated July 30, 2103.

NECTA appreciates the opportunity to provide the foregoing comments and looks forward to working collaboratively with the Commission, its Staff and other stakeholders to develop appropriate modifications to the current assessment system.

Very truly yours,

Susan S. Geiger

cc: Service List (electronic mail only)
1046670_1