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February 6, 2014

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**BY HAND DELIVERY AND  
ELECTRONIC MAIL**

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

NHPUC FEB06'14 PM 1:07

Re: Request for Waiver of Certain ILEC Reporting Rules

Dear Ms. Howland:

On behalf of Dunbarton Telephone Company, Inc. and Granite State Telephone, Inc. (the "ILECS"), and in accordance with rules Puc 201.05 and Puc 202.01(d), we respectfully request that the Commission waive the annual reporting requirements in Rules Puc 415.03(b)(3)-(5) and approve the alternative described herein.

In proceeding DRM 12-036, the Commission has generated a revised Chapter 400 - Rules for Telephone Service, which it submitted to the Joint Legislative Committee on Administrative Rules as Final Proposal #2013-51 on December 12, 2013. In its Final Proposal, the Commission has proposed to eliminate Rules Puc 415.03(b)(3)-(5), among others. These rules require the ILECs to file, by March 31st of every year, the Form ILEC-3 Annual Report, the Form ILEC-4 Quality of Service Report, and the Form ILEC-5 Quality of Service Report Card. In their place, the Commission has proposed new rules Puc 411.08 and Puc 412.01, which provide for a new Form ILEC-1 Annual Report with reduced reporting requirements. The proposed alteration of these reporting rules has proved uncontroversial, and no party has objected to them. Consequently, it appears highly likely that the elimination of these reporting rules will be approved and that they will go into effect. Accordingly, the ILECs request that the Commission waive rules Puc 415.03(b)(3)-(5) and, in the alternative, permit the ILECs to file reports that conform to the requirements of Form ILEC-1 in proposed rule 412.01.

Rule Puc 201.05 provides that the Commission may waive the provisions of any of its rules if (1) the waiver serves the public interest and (2) the waiver will not disrupt the orderly and efficient resolution of matters before the commission. Rule Puc 201.05 provides further that, in determining the "public interest," the Commission may find a waiver request to be in the public interest if "[c]ompliance with the rule would be onerous or inapplicable given the circumstances of the affected person" and "[t]he purpose of the rule would be satisfied by an alternative method proposed." The ILECs submit that, given the circumstances of the current rulemaking, it would

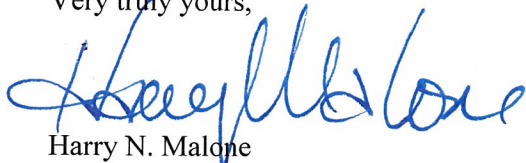
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be unduly burdensome for them to commit resources to compiling voluminous reports that the Commission has deemed no longer to be necessary or applicable, under rules that may soon be eliminated. (The current Form ILEC-3 runs to over 70 pages.) Furthermore, the ILECs have proposed an alternative that conforms with the Commission's proposed rules. Finally, not only will the grant of this waiver not disrupt the orderly and efficient resolution of matters before the Commission, it will in fact enhance the Commission's operations by relieving the Commission Staff of having to review unnecessary information.

Accordingly, the ILECs respectfully request that the Commission waive the annual reporting requirements in Rules Puc 415.03(b)(3)-(5) and instead accept the information required by proposed Form ILEC-1 as described in proposed rule Puc 412.01.

Very truly yours,



Harry N. Malone  
Counsel to the ILECs

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