



New England Cable & Telecommunications Association, Inc.

*New England Cable & Telecommunications Association, Inc.*  
● 53 State Street ● 5<sup>th</sup> Floor ● Boston, MA 02109  
Tel: 781.843.3418

October 18, 2021

**Via Electronic Mail**

Sarah Davis  
5 Davis Farm Road  
Portland, ME 04013  
[sarah.davis@consolidated.com](mailto:sarah.davis@consolidated.com)

***Re: Consolidated Communications / New Hampshire / Pole Invoices Second Half 2021***

Dear Ms. Davis:

I am reaching out on behalf of the New England Cable and Telecommunications Association (NECTA) whose member companies Comcast, Charter Communications and Atlantic Broadband (collectively, the “NECTA Members”) are in receipt of invoices from Consolidated Communications (CCI) for pole attachments in New Hampshire covering July – December of 2021. The invoices reflect annual per attachment rates of \$11.67 on solely owned poles and \$6.84 for jointly owned poles. By this letter and on behalf of its members, NECTA hereby disputes these rates and the jointly owned rate for “JU” attachments for poles for which CCI has no ownership interest.

NECTA respectfully requests that CCI provide all supporting documentation for the rates in the referenced invoices including CCI’s calculation of the applicable rate under NH PUC Rule 1304.06(a)(5) and 47 C.F.R. §1.1409(b) in effect as of October 1, 2017. Please provide CCI’s ARMIS reports for New Hampshire for 2018, 2019 and 2020. In addition, please indicate whether, and if so when, CCI has adopted GAAP accounting in New Hampshire, and provide the calculation of the Implementation Rate Differential under 47 C.F.R. §1.1409(g).

The NECTA Members will process the referenced invoices, but payment is subject to refund or offset against further invoice amounts. NECTA and its members reserve the right to file a complaint at the NH PUC in the event agreement on a just and reasonable rate cannot be reached.

Please provide the above information at your earliest convenience. If you have provided this information to NECTA in NH PUC Docket DE 21-020, kindly direct us to that information. Thank you for your cooperation in this matter, and please feel free to contact me with any questions.

Sincerely,  
/s/ David Soutter  
David Soutter  
[dsoutter@necta.info](mailto:dsoutter@necta.info)