

October 31, 2006

FREDERICK J. COOLBROTH 603.410.1703 FCOOLBROTH@DEVINEMILLIMET.COM

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

Re:

DT 06-067 Freedom Ring Communications LLC d/b/a BayRing Communications Complaint Against Verizon New Hampshire Regarding Access Charges

Enclosed for filing in the above-docketed matter are an original and seven (7) copies of New Hampshire Telephone Association's Petition to Intervene.

A diskette containing the Petition is also enclosed.

Very truly yours,

Dear Ms. Howland:

Frederick J. Coolbroth

FJC:kaa

Enclosures

cc: Service List

STATE OF NEW HAMPSHIRE

BEFORE THE

PUBLIC UTILITIES COMMISSION

DT 06-067

Freedom Ring Communications LLC d/b/a BayRing Communications Complaint Against Verizon New Hampshire Regarding Access Charges

Petition of New Hampshire Telephone Association to Intervene

Pursuant to RSA 541-A:32 and N.H. Admin. Rules Puc 203.17, New Hampshire Telephone Association, a New Hampshire voluntary corporation having its principal office at 600 South Stark Highway, Weare, New Hampshire ("NHTA") hereby petitions to intervene in the above-docketed proceeding, and in support of its Petition, states as follows:

- 1. NHTA is an association of small incumbent local exchange carriers operating in New Hampshire. NHTA's members include Merrimack County Telephone Company, Granite State Telephone, Inc., Kearsarge Telephone Company, Inc., Wilton Telephone Company, Inc., Hollis Telephone Company, Dunbarton Telephone Company, Inc., Northland Telephone Company of Maine, Inc., Bretton Woods Telephone Company, Inc., and Dixville Telephone Company.
- 2. As incumbent local exchange carriers (ILECs), each of the NHTA member companies provides switched access services to interexchange carriers.
- 3. Each of the NHTA companies interacts on an ongoing basis with Verizon New England, Inc., d/b/a Verizon New Hampshire ("Verizon") in the provision of exchange access services.

- 4. Although the issues initially raised in this Docket involved traffic between customers of competitive local exchange carriers (CLECs) and customers of wireless carriers, the scope of the proceeding has been expanded to include calls originated by or terminated to customers of the NHTA member companies.
- 5. According to the Supplemental Order of Notice dated October 23, 2006, the Commission intends to investigate the Verizon access charge rate elements applicable to various kinds of interexchange calls, including calls for which NHTA member companies provide access services.
- 6. NHTA has an interest in monitoring this Docket to ensure that calls involving NHTA member companies are accurately depicted during the course of the investigation. NHTA further has an interest to the extent that any issues studied involve or relate to the access services provided by the NHTA member companies.
- 7. NHTA believes, and therefore avers, that the rights, duties, privileges, immunities and other substantial interests of the NHTA member companies may be affected by this proceeding.
- 8. NHTA's participation in this proceeding is in the interest of justice and will enhance the orderly and prompt conduct of this proceeding.

WHEREFORE, NHTA respectfully requests that the Commission grant this Petition to

Intervene.

Respectfully submitted,

NEW HAMPSHIRE TELEPHONE ASSOCIATION

By Its Attorneys,

DEVINE, MILLIMET & BRANCH, PROFESSIONAL ASSOCIATION

Dated: October 31, 2006

Frederick J. Coolbroth 49 North Main Street

Concord, NH 03301 (603) 226-1000

fjcoolbroth@devinemillimet.com