

July 14, 2006

Debra A. Howland
Executive Director & Secretary
New Hampshire Public Utilities Commission
21 S. Fruit St.
Suite 10
Concord, NH 03301-2429



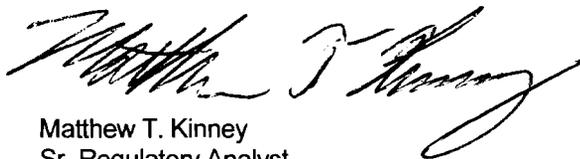
Re: DT 06-067, Petition of RNK Inc. d/b/a RNK Telecom for Leave to Intervene as a Party

Dear Secretary Howland:

Pursuant to the Order of Notice¹ issued in Docket DT 06-067, please find enclosed an original and seven (7) copies of RNK Inc. d/b/a RNK Telecom's Petition for Leave to Intervene as a Party ("Petition.") This filing is being made in accordance with N.H. Admin. Rule Puc 203.17 and RSA 541-A:32, I(b).

In addition, copies of the Petition will be served on Verizon-New Hampshire, BayRing, and the Office of Consumer Advocate.

Sincerely,



Matthew T. Kinney
Sr. Regulatory Analyst

¹ NH PUC Docket No. DT 06-067, *Order of Notice* (June 23, 2006).

**BEFORE THE STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

**Complaint of Freedom Ring)
Communications d/b/a BayRing)
Against Verizon)**

DT 06-067

**PETITION OF RNK INC. D/B/A RNK TELECOM FOR LEAVE TO INTERVENE AS A
PARTY**

RNK, Inc. d/b/a RNK Telecom (“RNK”), pursuant to PUC 203.17 and RSA 541-A:32(I), respectfully hereby petitions the New Hampshire Public Utilities Commission (“PUC”) for leave to intervene as a party in the above proceeding, stating in support thereof the following:

1. Petitioner, RNK Inc. d/b/a RNK Telecom is a corporation organized and existing under the laws of the Commonwealth of Massachusetts. Its principal place of business is located at 333 Elm St., Suite 310, Dedham, MA 02026

2. RNK is authorized by the PUC as a Competitive Toll Provider¹ and as a Competitive Local Exchange Carrier.²

3. RNK provides a variety of telecommunications and Internet Protocol (IP) enabled services in New Hampshire, including local exchange, retail and wholesale interstate, international, intrastate, and intraLATA toll, prepaid calling cards, and IP-enabled services.

¹ NH PUC, *Authorization to Provide IntraLATA Toll Service* (in accordance with Order No. 22,473). Authorization No. IXC-03-002-02 (March 20, 2002).

² NH PUC Docket No. DE 98-127, RNK Inc., *Petition for Authority to Provide Local Telecommunications Services, Order Nisi Granting Authorization*, Order No. 23,049 (October 28, 1998).

4. At the present time, a substantial portion of traffic originating and/or terminating to RNK's network (and customers) is originated on the networks of wireless carriers, independent incumbent LECs and/or CLECs. All of this third-party traffic, at present, originates or terminates to RNK via Verizon's tandem switches.

5. Resolution of the issues presented in the Order of Notice,³ including, but not limited to, the interpretation and application of Verizon's PUC Tariff No. 85 ("Access Tariff") and PUC Tariff No. 84 ("Tandem Transit Tariff")⁴ could detrimentally affect RNK's ability to provide innovative and low-cost services to New Hampshire consumers.

6. Moreover, because of RNK's position as a wholesaler to other service providers, RNK's pricing structure is particularly sensitive to changes (especially increases) in costs attributable to intercarrier compensation.

7. Finally, although RNK's footprint extends beyond New Hampshire to the rest of New England, New York, New Jersey, and Florida, RNK is relatively small, as compared to most of its competitors in its markets. It is generally inefficient and/or uneconomic for carriers, such as RNK, to interconnect directly with all wireless (and other) carriers.

8. Based on the foregoing, other party adequately represents the interests of RNK in this proceeding.

9. The intervention of RNK will not impair the orderly and prompt disposition of this proceeding.

³ NH PUC Docket No. DT 06-067, *Order of Notice* (June 23, 2006).

⁴ *Id.* at p. 2-3.

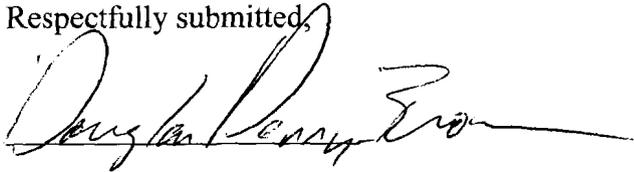
DT 06-067
July 12, 2006

Petition of RNK Inc. d/b/a RNK Telecom To Intervene

WHEREFORE, RNK requests that the PUC:

- A. Grant RNK party status in this proceedings and
- B. Grant such other relief as may be just and consistent with the foregoing.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Douglas S. Denny-Brown". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Douglas S. Denny-Brown, General Counsel/V.P. Regulatory Affairs

RNK, Inc. d/b/a RNK Telecom
333 Elm Street, Suite 310
Dedham, MA 02026
(781) 613-6100

DATED: July 14, 2006