

Sprint Nextel
2001 Edmund Halley Dr.
Reston VA 20191-3436
Office: (703) 433-4248 Fax: (703) 433-4142

Garnet Goins
Director, State Regulatory Northeast
Region
Email: Garnet.goins@sprint.com

BY ELECTRONIC MAIL AND FEDERAL EXPRESS

January 5, 2007

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

RE: Docket 06-067 – Sprint Communications Company, L.P. and Sprint Spectrum, L.P. Petition for Intervention

Dear Executive Director Howland,

Please find enclosed for filing an original and nine (9) copies of Sprint Communications Company, L.P. and Sprint Spectrum L.P.'s Petition for Intervention in the above referenced docket.

Please return a filed-stamped copy of the Petition for Intervention to me in the enclosed self-addressed, postage-prepaid envelope. Thank you for your attention to this matter. If you have any questions concerning this request, please do not hesitate to contact me at (703) 433-4248.

Sincerely,

Garnet M. Goins

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

FREEDOM RING COMMUNICATIONS, LLC)	
d/b/a BAYRING COMMUNICATIONS)	
)	
Complaint Against Verizon, New Hampshire Re:)	DT 06-067
Access Charges)	
)	
)	

**SPRINT COMMUNICATIONS COMPANY, L.P. AND
SPRINT SPECTRUM L.P.'S
PETITION FOR INTERVENTION**

Pursuant to New Hampshire Code of Administrative Rules PUC 203.02 and 203.17, Sprint Communications Company, L.P. and Sprint Spectrum L.P., (collectively, "Sprint Nextel") respectfully requests that the New Hampshire Public Utilities Commission ("Commission" or "PUC") grant its Petition for Intervention in the above-referenced proceeding. As the basis for its request, Sprint Nextel states as follows:

1. Sprint Communications Company, L.P. operates as a competitive intraLATA toll provider in New Hampshire providing interstate and intrastate interexchange service.¹ Additionally, Sprint Nextel's subsidiary, Sprint Spectrum L.P. operates as a commercial mobile radio service ("CMRS") provider offering wireless services in the state.²

2. On November 29, 2006, the Commission entered a Procedural Order and directed parties that the scope of the above referenced proceeding would address: (i) whether calls made or received by end-users which do not employ a Verizon local loop

¹ U.S. Sprint Communications Company of New Hampshire, DE 90-127, Order No. 20,042 (January 29, 1991).

² By statute, the Commission does not have jurisdiction over wireless carriers. NH RSA 362:6.

involve Verizon switched access; and (ii) if so, whether Verizon's access tariff requires the payment of certain rate elements, including but not limited to CCL charges. Under the interests of judicial efficiency, the Commission bifurcated this proceeding into two separate phases: the first to address tariff interpretation, and the second to decide to what extent, if any, reparations are due.

3. As a provider of wireline and wireless service in New Hampshire, Sprint Nextel has recently learned that Verizon New Hampshire is imposing switched access charges, including carrier common line (CCL) access charges on calls that do not involve a Verizon end-user or a Verizon local loop. Verizon does not separately identify transit traffic on its invoices for its New Hampshire switched access billing to Sprint Nextel. Therefore, this issue was not immediately apparent to Sprint Nextel --- which reviews thousands of monthly invoices involving switched access --- until it performed a detailed audit of Verizon New Hampshire invoices. Based on this audit, Sprint Nextel learned that Verizon is also charging Sprint Nextel CCL charges for traffic that does not involve Verizon end-users or a Verizon local loop.

4. Sprint Nextel agrees with certain intervenors that CCL charges should not apply to such traffic. Accordingly, Sprint Nextel seeks to intervene in this proceeding since it is also impacted by Verizon's questioned application of Tariff No. 85 in New Hampshire.

5. This Petition for Intervention constitutes a request to intervene in both Phase I (interpretation of Tariff No. 85) and Phase II (reparations, if any are due) of this proceeding.


6. The interests of justice would be served by permitting this intervention. No other party can adequately represent Sprint Nextel's interests in this proceeding. No party will be unduly prejudiced by Sprint Nextel's intervention in this proceeding. Additionally, Sprint Nextel's intervention at this juncture should have no adverse impact on the conduct of the Commission's proceeding.

7. Sprint Nextel requests that all communications, correspondence, orders and other documentation relating to this proceeding be directed to the undersigned attorney. Sprint Nextel also requests that the undersigned attorney be placed on the official service list compiled for purposes of this proceeding.

WHEREFORE, Sprint Nextel respectfully requests that the Commission grant its Petition for Intervention in this proceeding.

Respectfully submitted,

Sprint Communications Company L.P. and Sprint
Spectrum, L.P.

A handwritten signature in dark ink, appearing to read "Garnet M. Goins", is written over a horizontal line.

Garnet M. Goins
2001 Edmund Halley Drive
Reston, VA 20191
(703) 433-4248
(703) 433-4142 (facsimile)
Garnet.Goins@sprint.com

Its Attorney

Dated: January 5, 2007

CERTIFICATE OF SERVICE

I, Mable L. Semple, certify that I have served a true copy of Sprint Communications Company, L.P., and Sprint Spectrum, L.P.'s foregoing document in Docket 06-067 upon the parties of record in this proceeding by First Class U.S. Mail, postage prepaid, and/or Federal Express Overnight Delivery.

Dated at Washington, DC January 5, 2007

ANNMARIE BERRY
FAIRPOINT NEW ENGLAND
155 GANNETT DR
SOUTH PORTLAND ME 04106-6942

JAY GRUBER
AT&T COMMUNICATIONS OF NE INC
99 BEDFORD ST ROOM 420
BOSTON MA 02111

STEPHEN NELSON
DUNBARTON TELEPHONE CO
2 STARK HIGHWAY SOUTH
DUNBARTON NH 03045

GENT CAV
OTEL TELEKOM INC
ONE SUNDIAL AVE STE 210
MANCHESTER NH 03103

NANCY HUBERT
BRETTON WOODS TELEPHONE CO
MT WASHINGTON PLACE
BRETTON WOODS NH 03575

PENN PFAUTZ
AT&T
200 S LAUREL AVE
RM E4-3A01
MIDDLETOWN NJ 07748

MICHELLE CONSALVO
AT&T
99 BEDFORD STREET
BOSTON MA 02110

NANCY JACOBSON
CONVERSENT COMMUNICATIONS
24 ALBION RD STE 230
LINCOLN RI 02865

CHRIS RAND
GRANITE STATE TELEPHONE
600 SOUTHSTARK HIGHWAY PO BOX 87
WEARE NH 03281

FREDERICK J COOLBROTH
DEVINE MILLIMET & BRANCH
49 N MAIN ST
PO BOX 3610
CONCORD NH 03302

JEREMY L KATZ
SEGTEL INC
PO BOX 369
ENFIELD NH 03748

MIKE REED
TDS TELECOM
24 DEPOT SQUARE
NORTHFIELD VT 05663

VICTOR D DEL VECCHIO
VERIZON NEW ENGLAND
185 FRANKLIN ST 13TH FL
BOSTON MA 02110-1585

GREGORY M KENNAN
ONE COMMUNICATIONS
24 ALBION RD STE 230
LINCOLN RI 02865

KEVIN M SHEA
VERIZON NEW HAMPSHIRE
900 ELM STREET
19TH FLOOR
MANCHESTER NH 03101

DOUGLAS S DENNY-BROWN
RNK INC D/B/A RNK TELECOM
333 ELM ST STE 310
DEDHAM MA 02026

MATTHEW T KINNEY
RNK INC
333 ELM ST STE 310
DEDHAM MA 02026

PETER L SHEPHERD
VERIZON NEW HAMPSHIRE
125 HIGH ST
BOSTON MA 02110

SUSAN GEIGER
ORR & RENO PC
ONE EAGLE SQUARE
PO BOX 3550
CONCORD NH 03302-3550

DEBRA A MARTONE
TDS TELECOM
PO BOX 337
11 KEARSARGE AVE
CONTOOCOOK NH 03229-0337

WILLIAM STAFFORD
GRANITE STATE TELEPHONE
600 SOUTH STARK HWY
PO BOX 87
WEARE NH 03281

SHELIA GORMAN
VERIZON
125 HIGH STREET
BOSTON MA 02110

DEBRA A MARTONE
TDS TELECOM
PO BOX 337
11 KEARSARGE AVE
CONTOOCOOK NH 03229-0337

BEN THAYER
BAYRING COMMUNICATIONS
359 CORPORATE DR
PORTSMOUTH NH 03801-2888

DEBRA A HOWLAND
EXEC DIRECTOR & SECRETARY
NHPUC
21 S. FRUIT ST, SUITE 10
CONCORD NH 03301-2429

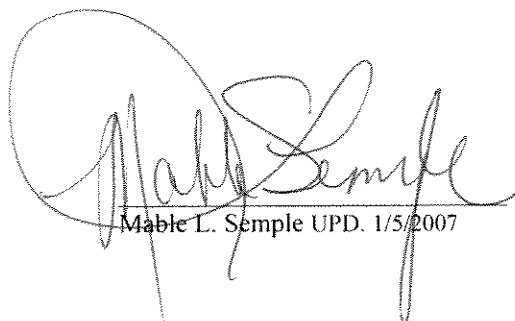
AMANDA NOONAN
CONSUMER AFFAIRS DIRECTOR
NHPUC
21 S. FRUIT ST, SUITE 10
CONCORD NH 03301-2429

LISA M THORNE
VERIZON NEW HAMPSHIRE
900 ELM ST FLR 19
MANCHESTER NH 03101

DARREN R WINSLOW
UNION COMMUNICATIONS
13 CENTRAL ST
FARMINGTON NH 03901

ANN WALSH
DIXVILLE TELEPHONE CO
ONE CRANBERRY HILL STE 105
LEXINGTON MA 02421

ROJEAN TULK
FAIRPOINT NEW ENGLAND
155 GANNETT DR
SOUTH PORTLAND ME 04106-6942



Mable L. Semple UPD. 1/5/2007