

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

RE: Comcast Phone of New Hampshire, LLC Request for Authority  
To Provide Local Telecommunications Services

Docket No. DT 08-013

**UNION TELEPHONE COMPANY  
PETITION TO INTERVENE**

Union Telephone Company d/b/a Union Communications (Union) hereby respectfully moves that the New Hampshire Public Utilities Commission (Commission) grant Union permission to intervene as a party in the above-captioned proceeding pursuant to Commission rule Puc 203.02(a) and RSA 541-A:32 (I). As set forth more fully below, the Commission should grant Union's request to intervene because the Company may be substantially and directly affected by the Commission's actions in this proceeding.

In support of this Motion, Union states the following:

1. Union is a New Hampshire Corporation that is a public utility as defined in RSA 362:2 and is regulated by the Commission. Union provides telecommunications services to residential and business customers and access services to utilities as defined in RSA 362:2 pursuant to authority granted by the Commission and has less than 25,000 access lines. Union is also a rural telephone company as that term is used in 47 U.S.C. § 251 (f)(1)(A) and has not waived the exemption provided to rural telephone companies under that section.
2. As a public utility as described above, Union's rights, duties, and other interests may be affected by this proceeding. The Commission's handling of authority of an area served by a company with less than 25,000 access lines – areas the New Hampshire state

statutes direct this commission to treat differently than other portions of the state -- as well as areas served by carriers with the exemption provided by 47 U.S.C. § 251 (f)(1)(A), are among the issues that the notice raises. These are issues of first impression at this Commission. Union has a substantial interest in monitoring and potentially participating in this proceeding for the purpose of addressing these issues for the decisions on these issues may impact the future operations of Union.

4. It would serve the interests of justice for the Commission to grant this intervention.

5. Union requests that the following individual be placed on the service list and be provided with all communications in this proceeding.

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WHEREFORE, Union respectfully requests that the Commission grant it intervention and thus, status as a party in the above referenced docket.

Respectfully submitted:  
Union Telephone Company

Dated: May 15, 2008

By:

A handwritten signature in cursive script, reading "Martin C. Rothfelder", written over a horizontal line.

Martin C. Rothfelder  
Rothfelder Stern, L.L.C.  
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**STATE OF NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION  
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DOCKET NO. DT 08-013**

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