

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

**RE: Docket No. DT 09-044**

New Hampshire Telephone Association Petition for an Investigation into the Regulatory Status of IP Enabled Voice Telecommunication Services

**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.

2. As a telecommunications provider, Union's rights, duties, and other interests may be affected by this proceeding. The issues raised in the Order of Notice in this proceeding could be significant to Union's future operations and Union has interest in determining that decisions or policies from this docket do not adversely impact Union or its customers. Specifically, IP Enabled Voice Telecommunications Service providers may be direct

competitors of Union, therefore Union may be directly impacted with the Commission decisions regarding the regulatory treatment of the IP service including inter-carrier compensation issues.

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

4. No other party represents Union's interests in this docket.

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

Darren Winslow  
Union Telephone Company  
7 Central Street  
PO Box 577  
Farmington, NH 03835  
Phone: (603)859-9304  
Fax: (603)859-9587  
Email: dwinslow@utel.com

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

By:   
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Dated: June 18, 2009