



DT09-079

CONFIDENTIAL
MATERIAL
IN COMM FILE

April 23, 2009

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



RE: Waiver Request to Obtain Growth Numbering Resources in Hillsboro, NH

Dear Ms. Howland:

The purpose of this letter is to seek a waiver of NeuStar's decision to deny Merrimack County Telephone Company/TDS Telecom's request for one one-thousand block. We require the block to fulfill strong customer demand for Primary Rate Interface ("PRI") service in our Hillsboro exchange.

Currently the Hillsboro switch is not equipped with PRI capability, but we can provide the service from our Contoocook switch. We plan to create a Hillsboro rate center in the Contoocook switch. To facilitate this arrangement we need a LRN and a block of numbers. To obtain a LRN, we need to request an entire code. At this time, however, we do not meet the required utilization threshold. In this instance we would keep the "0" block and pool the remaining numbers.

It has been suggested that we could achieve the same result by providing FX Service. Providing the service via FX from Contoocook will not meet the needs of our customers. For example, SAU #34 needs PRI service (see attached letter) with local service. With an FX PRI, parents and community members would incur long distance charges to call the school, as would the school to contact parents.

PRI service would be provided to these customers via tariffed rates with no additional facilities required.

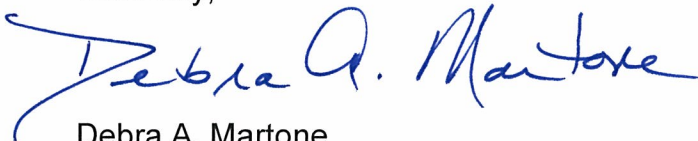
Enclosed is Neustar documentation for your review. Documentation from our customers is proprietary and confidential and is being furnished by Merrimack County in accordance with the provisions of RSA 378:43. The information has been marked CONFIDENTIAL and is enclosed in a separate sealed envelope.

In accordance with RSA 378:43, II, Merrimack County hereby certifies with respect to such CONFIDENTIAL information:

11 KEARSARGE AVENUE
P.O. BOX 337
CONTOOCCOOK, NH 03229-0337

1. That such information is not general public knowledge or published elsewhere;
2. That measures have been taken by Merrimack County to prevent dissemination of such information in the ordinary course of business; and
3. That such information:
 - a. Embodies trade secrets that required significant effort and cost to produce, or other confidential research, development, financial or commercial information including customer, geographic, market, vendor or product-specific data such as pricing, usage, costing, forecasting, revenue, earnings or technology information not reflected in tariffs of general application; or
 - b. Pertains to the provision of competitive service.

Sincerely,



Debra A. Martone
Manager, State Government Affairs