## STATE OF NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

PETITION BY CERTAIN RURAL TELEPHONE COMPANIES REGARDING CLEC REGISTRATIONS WITHIN THEIR EXCHANGES

DT 10-183

## Petition to Intervene of New England Cable and Telecommunications Association

Pursuant to New Hampshire Revised Statutes Annotated 541-A:32, New Hampshire Administrative Rules, Puc 203.17, and the August 5, 2010 Order of Notice issued by the Public Utilities Commission ("Commission"), the New England Cable and Telecommunications Association, Inc. ("NECTA") petitions to intervene as a party in the above-captioned docket. As set forth herein, NECTA's legal rights, duties, privileges, immunities and special interests will be directly affected by the Commission's final decision in this proceeding.

- 1. NECTA is a non-profit corporation and trade association that represents the interests of most cable television companies and their voice and Internet affiliates in the six state New England region, including New Hampshire.
- 2. NECTA has offices located at 10 Forbes Road, Suite 440W, Braintree, MA 02184.
- 3. NECTA has on many occasions represented the interests of its members in proceedings conducted by the Commission as a party.

4. Many NECTA member companies or affiliates are engaged in offering voice communications services in New Hampshire and in other New England states, and they serve or may seek to serve customers located in New Hampshire territories served by rural incumbent local exchange carriers ("RLECs"). As such, the legal rights, duties and privileges of NECTA and its members are substantially and specifically affected by the instant investigation into whether barriers limiting competitive telecommunications entry into the territories of RLECs are preempted by federal law, specifically at 47 U.S.C. § 253.

5. NECTA anticipates attending the September 2, 2010 public hearing and procedural conference and further participating in this docket consistent with its party status. NECTA reserves the right to conduct discovery, present evidence, crossexamine witnesses and present written pleadings and briefs to the extent appropriate.

6. To the extent that NECTA member companies elect to intervene separately in this docket, NECTA will coordinate its participation with such companies to minimize duplication of evidence, examination or argument.

7. Copies of all pleadings and other materials should be provided to the following:

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## Conclusion

Accordingly, for the above described reasons, the Commission should grant NECTA's Petition to Intervene.

Respectfully submitted,

NEW ENGLAND CABLE AND TELECOMMUNICATIONS ASSOCIATION, INC.

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Dated: August 30, 2010