BEFORE THE STATE OF NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

In Re:

North American Numbering Plan)	
Administrator Petition for Relief)	DT 10-211
Of the 603 Numbering Plan Area)	

PETITION OF T-MOBILE FOR LEAVE TO INTERVENE

COMES NOW T-Mobile Northeast LLC, d/b/a T-Mobile (hereinafter T-Mobile), and hereby requests the New Hampshire Public Utilities Commission ("Commission") allow T-Mobile to intervene and participate fully as a party of record in the above reference matter pursuant to New Hampshire Code of Administrative Rules, PUC 203.17, RSA 541-A:32 and the Commission Notice dated October 15, 2010. In support of its Application, T-Mobile respectfully states as follows:

1. On October 15, 2010, the Commission initiated this proceeding in order to address a Petition filed by the North American Numbering Plan Administrator which seeks to address necessary area code relief of the 603 Numbering Plan Area in advance of the current projected exhaustion date of third quarter of 2012.

2. T-Mobile is a facilities-based wireless provider, operating in the State of New Hampshire pursuant to licenses and spectrum issued by and purchased from the Federal Communications Commission.

3. T-Mobile offers commercial wireless products and services to consumers within the State of New Hampshire and thereby relies upon timely access to an ample supply of numbering resources in order to serve our customers and compete in the competitive marketplace.

2

4. T-Mobile will be required to make necessary operational adjustments in our network in order to support any implementation of area code relief for the 603 Numbering Plan Area.

5. Accordingly, T-Mobile's interest in this proceeding may be substantially affected by the Commission's determinations in this proceeding. T-Mobile's rights and interests cannot be adequately addressed or represented by any other party to this proceeding.

6. T-Mobile asks that it be copied on all filings made by any party, intervenor, staff or party at interest, as well as be provided notices of hearing, opportunities to plead and other steps in this proceeding.

7. All communications and correspondence for this proceeding should be directed to the following individuals:

Ms. Michele K. Thomas T-Mobile USA Inc. 4 Campus Drive Parsippany, NJ 07054 (973)451-8399 e-mail: <u>Michele.Thomas@T-Mobile.com</u> Ms. Natalie McNamer T-Mobile USA Inc. 2001 Butterfield Road Downers Grove, IL 60515 (630)290-0021 email:<u>Natalie.McNamer@T-Mobile.com</u>

WHEREFORE, in recognition of the foregoing, T-Mobile requests that the Commission grant its

Application to intervene, and that T-Mobile be allowed to participate fully as a party of record in

this docket.

Respectfully submitted

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Michele K. Thomas Principal Corporate Counsel T-Mobile USA Inc. 4 Campus Drive Parsippany, NJ 07054

Dated: October 22, 2010