

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

In re: Intrastate Access Rate Reform

MOTION TO AMEND PROCEDURAL SCHEDULE

Northern New England Telephone Operations LLC d/b/a FairPoint Communications-NNE (“FairPoint”) hereby moves to amend the procedural schedule in the subject proceeding. In support of this motion, FairPoint states as follows:

1. On November 18, 2011, the Federal Communications Commission (“FCC”) released its Order in WC Docket No. 10-90 regarding, among other things, the Connect America Fund (“CAF Order”).¹ The CAF Order requires, in relevant part, that telecommunications carriers begin transitioning certain terminating intrastate switched access to a “bill-and keep” framework. Under the first step of this transition, carriers are to file tariff revisions with state commissions setting forth the rates that will apply to intrastate switched access services from July 1, 2012 to June 30, 2013.

2. In the Commission’s Secretarial Letter of April 23, 2012, it adopted a procedural schedule in which carriers are directed to file proposed changes to their intrastate switched access tariffs by June 1, 2012. Furthermore, to facilitate Staff review of the proposed changes, the Secretarial Letter directed carriers to file by May 15, 2012 an accounting of intrastate switched access revenue, by rate element and demand, for FY 2011 (October 1, 2010 through September 30, 2011); an account, by rate element, of revenue that would have been produced

¹ *Connect America Fund*, WC Docket No. 10-90, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663 (2011).

using interstate rate elements, interstate rates and corresponding FY 2011 intrastate demand; and, to the extent interstate rate elements are not identical to intrastate rate elements, an explanation of how the company addressed rate elements that did not match.

3. FairPoint has 30 local exchange affiliates that operate in 18 states, all of which must also file revised intrastate switched access tariffs in accordance with the FCC's new rules. The production of these tariffs and supporting documentation, including the tariff review plan required for the filing of FairPoint's federal access tariff, is an extensive undertaking requiring the compilation and analysis of significant amounts of data. Furthermore, it requires a consolidated effort by the single department within FairPoint's parent organization that produces these documents, an effort which does not lend itself to parallel efforts or advance review.

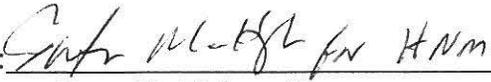
4. FairPoint anticipates that, even as fervently as it is working, it will not be in a position to produce the information that the Commission has requested, in the format it has requested, by the current deadline of May 15, 2012. Instead, FairPoint currently expects that it will need an additional two weeks.

5. Accordingly, FairPoint respectfully requests that the Commission extend this date to May 29, 2012. FairPoint will still submit its revised tariff on the deadline of June 1, 2012. Even with the requested extension, the Commission will still be afforded the 30 days' notice as specified in the relevant statutes and rules, *e.g.* RSA 378:3.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing motion was forwarded this day to the parties by electronic mail.

Dated: May 3, 2012

By:  for HNM
Harry N. Malone, Esq.