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BY:

December 15, 2009

Debra Howland
Executive Director & Secretary
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH MD 03301-2429

Re: Docket No. DT 08-028 (Joint Petition of Hollis Telephone Company, Inc. et al).

Dear Ms. Howland,

As the Commission is aware, Global has both offered to interconnect with each of the TDS Petitioners at industry-wide rates and has requested a fact hearing to explore the bills and services it received and the nature of the traffic it forwarded. TDS has complained that it would be injured by the delay caused by considering either of these options, as it would have to terminate Global's traffic with no recompense.

In order to assuage that concern, Global has decided to offer to post with the Commission an amount of money equal to the access charges it would owe to the TDS companies under the standard industry VoIP-completion rate, \$.00045 per MOU, as evidenced in Verizon's contracts with AT&T, and Verizon's testimony in Global's recent New York and Pennsylvania cases that this rate is its "unitary" rate for VoIP. It is a requirement of such interconnection agreements rates that they not exceed the cost of performing the services at issue. Thus, if they receive a bond at this rate, the TDS firms would recapture at least their costs of completion during negotiation or further examination of past disputes.

As the attached affidavit of David Shaw attests, application of the Verizon rate to the traffic levels in New Hampshire during an estimated six month period leads to a figure of \$6,000. If this form of bond is accepted by the Commission, Global will provide a check in that amount within three days.

Thank you in advance for your consideration of this proposal.

Sincerely yours,


Joel Davidow

SMG:bas
Enclosure

cc: Electronic Service List

State of New Hampshire
Before the New Hampshire Public Utilities Commission

DT 08-028

Joint Petition of Hollis Telephone Company, Inc., Kearsarge Telephone Company, Merrimack County Telephone Company, and Wilton Telephone Company, Inc., for Authority to Block the Termination of Traffic from Global NAPs, Inc. to Exchanges of the Joint Petitioners in the Public Switched Telephone Network

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