STATE OF NEW HAMPSHIRE Before the PUBLIC UTILITIES COMMISSION

NORTHERN NEW ENGLAND TELEPHONE OPERATIONS, LLC d/b/a FAIRPOINT COMMUNICATIONS-NNE Tariff Filing to Implement Certain Provisions of the Order on Remand DT 12-337

CANNE'S PETITION TO INTERVENE

The CLEC Association of Northern New England, Inc. ("CANNE"), on behalf of itself and its members:

Biddeford Internet Corp., d/b/a Great Works Internet;

Choice One of New Hampshire, Inc., Conversent Communications of New Hampshire, LLC, CTC Communications Corp., and Lightship Telecom, LLC, all of which do business as EarthLink Business;

Freedom Ring Communications, LLC, d/b/a BayRing Communications;

G4 Telecom – NH, Inc., d/b/a Otel Telekom;

Mid Maine Telplus and CRC Communications of Maine, Inc., collectively doing business as OTT Communications;

National Mobile Communications Corp., d/b/a Sovernet Communications; and

segTEL, Inc.,

respectfully petitions to intervene in this proceeding pursuant to RSA 541-A:32 and New Hampshire Administrative Rules Puc 203.17. In support of its Petition, CANNE states:

- 1. CANNE is a not-for-profit association of facilities-based CLECs in Maine, New Hampshire and Vermont.
- 2. Each of the specified members of CANNE offers competitive local exchange services and other telecommunications services in New Hampshire. They do so in part by

obtaining unbundled network elements, including high capacity loops and transport and dark fiber transport, from Northern New England Telephone Operations, LLC, d/b/a FairPoint Communications-NNE ("FairPoint").

- 3. The purported reclassification of wire centers by FairPoint adversely affects the CANNE members' ability to obtain such unbundled elements, and the costs of such unbundled elements that are already in use, in affected wire centers, and, in turn, the members' ability to offer services to their customers and the cost of the services they can provide.
- 4. Therefore, FairPoint's purported wire center reclassifications may affect the rights, duties, privileges, immunities, or other substantial interests of CANNE and its members.
- 5. Granting this petition to intervene will not interfere with the prompt and orderly conduct of these proceedings.
- 6. Therefore, CANNE respectfully requests to intervene in this proceeding on behalf of itself and of its members named above.

November 26, 2012

Respectfully Submitted,

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