

PRIMMER PIPER EGGLESTON & CRAMER PC
Attorneys at Law

PAUL J. PHILLIPS
pphillips@primmer.com

TEL: (603) 626-3300
FAX: (603) 626-0997

900 Elm St., 19th Floor | P.O. Box 3600 | Manchester, NH 03105-3600

ADMITTED IN NEW HAMPSHIRE AND VERMONT

VIA ELECTRONIC MAIL

NHPUC MAR02'17 AM 11:28

March 1, 2017

Ms. Debra Howland
Executive Director and Secretary
New Hampshire Public Utilities Commission
21 South Fruit Street
Concord, NH 03301

Re: DT 16-872 (Joint Petition for Findings in Furtherance of the Acquisition of FairPoint Communications, Inc. and its New Hampshire Operating Subsidiaries by Consolidated Communications Holdings, Inc.)

Dear Ms. Howland:

FairPoint Communications, Inc. ("FairPoint") is presently responding to the Set 1 Data Requests propounded by the Commission's Staff. In your Secretarial Letter of February 23, 2017, you extended the deadline for such Responses to the close of business today (March 1st). The number of Data Requests is quite voluminous and the time provided for responses is quite short. While FairPoint is making every effort to meet this deadline, FairPoint anticipates that it will not be able to respond to all of Staff's Data Requests in the time allotted and will likely need an extra day or two to assemble and provide the information that is responsive to several Data Requests.

I have communicated FairPoint's scheduling concerns to David Wiesner, Staff Attorney, who has indicated that Staff will not object to FairPoint taking an extra day or two to complete its Responses to Staff's Data Requests.

The Procedural Schedule in this matter calls for rolling discovery through March 10th. FairPoint does not believe that the additional time for responding to the Set 1 Data Requests will result in further changes to the Procedural Schedule. The parties will continue to discuss scheduling issues going forward and will advise the Commission if additional changes are needed.

Please let me know if you have any questions.

Sincerely,


Paul J. Phillips
Counsel for FairPoint Communications, Inc.

PJP:
cc: Electronic Service List, DT 16-872