

Patrick C. McHugh 770 Elm Street Manchester, NH 03101 603-591-5465 patrick.mchugh@consolidated.com

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July 12, 2019

Ms. Debra A. Howland Executive Director and Secretary New Hampshire Public Utilities Commission 21 South Fruit Street, Suite 10 Concord, New Hampshire 03301

Re: DT 19-141: Petition of Consolidated Communications of Northern New England Company, LLC for Approval of Modifications to the Wholesale Performance Plan

Dear Ms. Howland:

Enclosed, please find an original and six copies of Consolidated Communications' Reply Brief in connection with the above captioned docket. This brief is submitted pursuant to the New Hampshire Public Utilities Commission's Secretarial Letter issued June 10, 2019. In that Secretarial Letter, the Commission directed the parties to address a threshold question as follows: "Do the FCC Forbearance Orders constitute a change of law as contemplated by section K of the WPP?" An electronic copy of the complete filing will be submitted via email.

Respectfully submitted,

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Patrick C. McHugh, Esq. On behalf of Consolidated Communications

Cc: DT 19-141 Service List