

State of New Hampshire
Public Utilities Commission

DT 11-151
Merrimack County Telephone Company
Petition For An Alternative Form Of Regulation

Petition For Late Intervention On Behalf Of Daniel Bailey

Petitioner, Daniel Bailey, moves for late intervention in this proceeding, pursuant to Rule Puc 203.17 and RSA 541-A:32, II, and states as follows:

1. Petitioner, Daniel Bailey, resides in Contoocook, New Hampshire.
2. Petitioner is a low income residential customer of Merrimack County Telephone Company (MCTC), a wholly-owned subsidiary of TDS Telecommunications Corporation (TDS Telecom).
3. Petitioner has an interest in this proceeding as a residential customer of MCTC.
4. Petitioner was a full party intervenor in DT 07-027, Petitions For An Alternative Form Of Regulation, filed by MCTC and other TDS telephone companies.
5. Petitioner seeks to assure universal access to affordable stand-alone basic telephone service.
6. The rights, duties, privileges, and other substantial interest of Petitioner may be affected by this proceeding.
7. Petitioner seeks to intervene as a full party intervenor in this proceeding.
8. Petitioner agrees to be bound by all protective orders with respect to treatment of confidential information and documents.
9. Petitioner is aware that this petition is being filed after the July 22, 2011 deadline for filing for intervention as set forth in the Order of Notice dated July 7, 2011.


10. Petitioner agrees to abide by the procedural schedule set by the Commission for this proceeding.

11. The granting of this petition is in the interest of justice, will not impair the orderly and prompt conduct of this proceeding, will not result in delay, and will not prejudice the interest of any party.

12. On July 26, 2011 counsel for Petitioner notified the parties by email that a petition for late intervention was being filed on this date in this proceeding.

WHEREFORE, Petitioner, Daniel Bailey, requests that the Commission grant him leave to intervene as a full party intervenor in this proceeding.

Respectfully submitted
Daniel Bailey, Petitioner
By His Attorneys

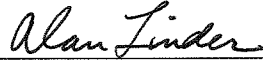


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7/26/11
Date

Certification of Service

I certify that on this date I emailed a copy of the within Petition to the Commission and the parties to this proceeding.



Alan Linder
Attorney for Daniel Bailey

Date: 7/26/11