

June 21, 2012

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BY HAND DELIVERY

Debra A. Howland, Executive Director & Secretary New Hampshire Public Utilities Commission 21 S. Fruit Street, Suite 10 Concord, NH 03301 RECEIVED

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NH PUBLIC

UTILITIES

COMMISSION

Re:

DT 12-142; Merrimack County Telephone Company and Wilton Telephone Company; Request to Overturn Decision of the North American Numbering Plan Administrator

Dear Ms. Howland:

On behalf of Merrimack County Telephone Company and Wilton Telephone Company ("TDS"), we respectfully request that the Commission expedite its review of the subject "safety valve" request, which was submitted on May 29, 2012 and acknowledged by the Commission on May 31, 2012.

In its Third Report and Order and Second Order on Reconsideration in the *Numbering Resource Optimization* proceeding, the Federal Communications Commission stated that:

we recognize that in many instances, the failure to address a request for additional numbering resources can impair a carrier's ability to stay in or expand business. We therefore direct states to act on carrier requests for a safety valve as *expeditiously as possible*. Although we do not establish a specific time limit for states to act on these requests, *we believe that, in most instances, 10 business days from receipt of a request* that the state determines to be sufficiently detailed and complete will be sufficient time to review and act upon safety valve requests. If a state does not reach a decision on a safety valve request within a reasonable timeframe, carriers may submit such requests to the Commission for resolution.¹

¹ *Numbering Resource Optimization*, CC Docket No. 99-200, Third Report and Order and Second Order on Reconsideration, 17 FCC Rcd 252 ¶ 66 (2001) (emphasis supplied).

It has now been 17 business days since our request was submitted to the Commission, during which time TDS's plans have been suspended. As we described in our initial request, it appears that at least half of the telephone numbers in the 603 area code are not in use, and the projected life of the 603 area code is expected to be another ten years. Given that number exhaust is not an issue, and TDS is only requesting two codes, we respectfully submit that that there is no impediment to the expedient grant of TDS's request.

Thank you for your attention to this matter. Please feel free to contact me if you, the Commission, or Staff have any questions or believe that there are further issues to address.

A compact disk containing this document is also enclosed.

Very truly yours,

Iarry N. Malone

HNM:ljm