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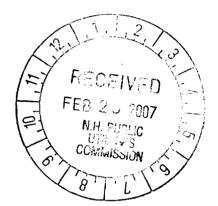
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## Please Respond to the Exeter Office

February 23, 2007



## VIA REGULAR MAIL AND E-MAIL

Debra Howland, Executive Director New Hampshire Public Utilities Commission 21 South Fruit St., Suite 10 Concord, NH 03301-2429

DM 07-011 / In the Matter of Verizon New England and Fair Point Communications

Dear Ms. Howland:

Re:

Enclosed please find an original and seven (7) copies of a Supplement to Petition to Intervene in the above-captioned matter on behalf of the City of Keene, New Hampshire. As we discussed, this Supplement would add an additional municipality to the five who filed the initial Petition to Intervene.

We have also enclosed an additional copy of this letter and the Supplement to Petition to Intervene. Please date-stamp this document to evidence your receipt and return the date-stamped copy to us in the enclosed return envelope.

A copy of the foregoing has been forwarded this date to the persons listed on the service list attached to the Supplement to Petition.

Very truly yours,

DONAHUE, TUCKER & CIANDELLA, PLLC

Katherine B. Miller kmiller@dtclawyers.com

RDC/dlc Enclosures

cc:

City of Keene

Service List

S:\PO-PZ\PUC Pole Investigation\Verizon Sale to FairPoint\ltr to PUC re keene supp 022307.doc

STATE OF NEW HAMPSHIRE

BEFORE THE

PUBLIC UTILITIES COMMISSION

DM 07-011

Verizon New England, et al, and FairPoint Communications, Inc.

## Supplement to Petition of Municipalities to Intervene

NOW COMES the City of Keene, by and through its attorneys,
DONAHUE, TUCKER & CIANDELLA, PLLC, and moves the Commission to
grant it intervenor status, without limitation, pursuant to RSA
541-A:32 and N.H. Administrative Rule, PUC 203.02, along with
the municipalities of Hanover, Newmarket, Raymond, Salem and
Seabrook ("Municipalities"), which had previously filed a
Petition to Intervene with the Commission, on February 22, 2007.
In support of this motion, the City of Keene states:

- The City of Keene is a municipal corporation duly organized pursuant to New Hampshire state law.
- 2. The City of Keene incorporates by reference, and without reduplication, paragraphs 2-13 the Petition to Intervene filed by the Municipalities in this Docket on February 22, 2007 as if fully set forth herein.
- 3. By way of further Petition, the City of Keene states that its City officials met on February 22, 2007 to authorize

this intervention, but not in time to be included in the initial filing of the Petition to Intervene by the other Municipalities. The City's intervention will not delay the proceeding for this docket nor prejudice the rights of any parties thereto.

WHEREFORE, the City of Keene respectfully moves the Commission to:

- A. Accept its petition to intervene; and
- B. Grant such other relief as is just and reasonable.

Respectfully submitted,

THE CITY OF KEENE By its attorneys,

DONAHUE, TUCKER & CIANDELLA, PLLC

Date: 2/23/07

Bv:

Katherine B. Miller Robert D. Ciandella 225 Water Street Exeter, NH 03833 (603) 778-0686

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Petition to Intervene has this day been forwarded via e-mail and/or first class mail to the service list attached hereto.

Katherine B. Miller, Esq.

 $S:\PO-PZ\PUC\ Pole\ Investigation\Verizon\ Sale\ to\ FairPoint\City\ of\ Keene\ supplement\ to\ motion\ to\ intervene\ 022307.doc$