## STATE OF NEW HAMPSHIRE

## BEFORE THE

## PUBLIC UTILTIES COMMISSION

#### DT 08-028

HOLLIS, KEARSARGE, MERRIMACK COUNTY, AND WILTON TELEPHONE COMPANIES' PETITIONS FOR AUTHORITY TO BLOCK THE TERMINATION OF ALL TRAFFIC CARRIED BY GLOBAL NAPS, INC. TO TDS EXCHANGES

# PETITION FOR INTERVENTION

NOW COMES Freedom Ring Communications, LLC. d/b/a BayRing Communications (BayRing), through the undersigned, and respectfully petitions the New Hampshire Public Utilities Commission (Commission) for leave to intervene in the above-captioned proceeding under Rule Puc 203.02 and Rule Puc 203.17 (and RSA 541-A:32). In support of the Petition, BayRing states as follows:

- 1. BayRing is a competitive local exchange carrier (CLEC) headquartered in Portsmouth, New Hampshire. BayRing provides service to business and residential customers in Verizon service areas in New Hampshire and access services to other telecommunication providers. As a CLEC, BayRing has a substantial interest in monitoring this proceeding for the purpose of determining how the substantive and procedural issues in this case may affect the future operations of BayRing.
- 2. Specifically, BayRing has an interest in monitoring this proceeding for the purpose of determining how the issues in this case may affect BayRing's ability to bill and/or collect access revenues. In addition, Global Naps, Inc. has not paid BayRing for previously billed terminating access. BayRing's rights, duties, privileges or substantial interests may be affected by this proceeding.
- 3. This Petition is timely filed in accordance with the Commission's Order of Notice in this docket, and granting intervention to BayRing would not impair the orderly and prompt conduct of the proceedings and would be in the interests of justice.

WHEREFORE, BayRing respectfully requests that the Commission grant it intervenor status in this proceeding, along with any reasonable conditions as the Commission deems appropriate.

# Respectfully submitted

Freedom Ring Communications, LLC. d/b/a BayRing Communications
Benjamin Thayer
President
359 Corporate Drive
Portsmouth, NH 03801
Telephone: (603) 766-1000

By;

Benjamin Thayer

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