

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

ELECTRIC AND TELEPHONE UTILITIES
REVIEW OF UTILITY POLE ISSUES

DT 12-246

OBJECTION OF USNH TO NECTA'S MOTION TO STAY

The University System of New Hampshire ("USNH") hereby objects to the Motion to Stay filed by New England Cable & Telecommunications Association, Inc. ("NECTA") dated October 24, 2012. NECTA's Motion to Stay is founded on the assumption that the rulemaking process recommended by the Commission's Director of Telecommunications will proceed more efficiently if the Commission waits until the existing disputes between New Hampshire Optical Systems ("NHOS") and others that are the subject of Docket DT 12-107 have been resolved. Although USNH agrees that *identification* of the concerns that have been raised by NHOS in DT 12-107 will aid the Commission in understanding where gaps exist in its existing pole attachment rules, *resolution* of the specific disputes between NHOS and other attaching parties or pole owners is not necessary for this proceeding to go forward. Waiting for a resolution of those issues will simply delay the much-needed rulemaking process being recommended by the Commission's staff.

USNH recognizes that a rulemaking process relating to pole attachments may take an extended period of time, and therefore believes it is particularly important that the Commission commence such a process as soon as possible. Delaying the rulemaking further will not be in the

public interest and, USNH believes, may unnecessarily result in the Commission having to resolve an increasing number of disputes that could have been avoided.

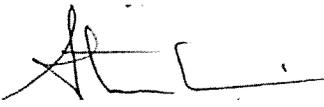
For the foregoing reasons, USNH respectfully requests that the Commission reject NECTA's Motion to Stay and proceed with the rulemaking process as recommended by the Commission's Director of Telecommunications..

UNIVERSITY SYSTEM OF NEW HAMPSHIRE

By its Attorneys,

McLANE, GRAF, RAULERSON & MIDDLETON,
PROFESSIONAL ASSOCIATION

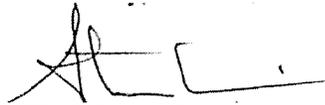
Date: November 1, 2012

By:  _____

Steven V. Camerino
11 South Main Street, Suite 500
Concord, NH 03301
Telephone: (603) 226-0400
Email: steven.camerino@mclane.com

Certificate of Service

I hereby certify that a copy of this Objection has been served on the parties identified on the service list in this case.

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Steven V. Camerino