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## VIA OVERNIGHT DELIVERY

November 1, 2012

Ms. Debra Howland Executive Director and Secretary New Hampshire Public Utilities Commission 21 South Fruit Street Concord, NH 03301



Re: DM 12-276 (Objections of Northern New England Telephone Operations LLC and Enhanced Communications of Northern New England Inc.)

Dear Ms. Howland:

I write on behalf of nine incumbent local exchange carriers who are members of the New Hampshire Telephone Association (the "Nine NHTA ILECs")<sup>1</sup> to express their joint support for the objections raised by Northern New England Telephone Operations LLC and Enhanced Communications of Northern New England Inc. (the two foregoing, together, "FairPoint") under RSA 363-A:4. The Nine NHTA ILECs have reviewed the Order of Notice issued by the Commission on October 5, 2012, and do not anticipate seeking to intervene in this matter.

The Nine NHTA ILECs concur with FairPoint's objections to annual assessments for activities and services that fall outside the respective jurisdictions of the Commission and the Office of Consumer Advocate ("OCA"). Specifically, the Nine NHTA ILECs do not believe the Commission should levy assessments, under Chapter 363-A, for revenues derived from interstate telecommunications services; nor do the Nine NHTA ILECs believe that an "Excepted Local Exchange Carrier" ("ELEC") can be assessed for

<sup>&</sup>lt;sup>1</sup> The Nine NHTA ILECs are: Bretton Woods Telephone Company, Inc., Dixville Telephone Company; Dunbarton Telephone Company, Inc.; Granite State Communications, TDS Telecom/Hollis Telephone Company, Inc.; TDS Telecom/Kearsarge Telephone Company; TDS Telecom/Merrimack County Telephone Company; TDS Telecom/Union Telephone Company, Inc.; and TDS Telecom/Wilton Telephone Company, Inc.

expenses relating to the OCA, as ELECs are exempted from the OCA's scope of authority under RSA 363:28-a,V(b) (eff. Aug. 10, 2012).

For these reasons, the Nine NHTA ILECs urge the Commission to resolve this matter promptly in FairPoint's favor.

Thank you for your attention to this matter. Please let me know if you have any questions.

Sincerely,

Paul J. Phillips

cc: Attached Service List, Docket No. DM 12-276 (copies e-mailed where shown)
Nine NHTA ILECs

## SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED

Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.

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## **FILING INSTRUCTIONS:**

a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:

DEBRA A HOWLAND

EXECUTIVE DIRECTOR NHPUC 21 S. FRUIT ST, SUITE 10 CONCORD NH 03301-2429

- b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.
- c) Serve a written copy on each person on the service list not able to receive electronic mail.