## STATE OF NEW HAMPSHIRE

**Inter-Department Communication** 

**DATE:** Sept. 23, 2014 **AT (OFFICE):** NHPUC

FROM: Michael Ladam, Assistant Director of Telecommunications

SUBJECT: Teleconnect Transfer of Customer Base; Request for waiver of Puc

405.03(a)(2)

TO: Debra Howland, Executive Director

Commissioners

Teleconnect Long Distance Services and Systems Co. (Teleconnect) and MCI Communications Services, Inc. d/b/a Verizon Business Services (MCI) are both ultimately owned and controlled by Verizon Communications, Inc. (Verizon). Teleconnect operates in many states and is a registered telephone utility in New Hampshire providing intrastate long distance service. As part of an internal reorganization, Verizon intends to transfer the customers of Teleconnect to MCI.

Teleconnect customers were notified of the transfer in writing on August 1, 2014. This notification provided proper detail regarding the effect of the change and of customer options. On September 22, 2014, MCI made a complete filing of a Transfer of Customer Base Report with the Commission. MCI had previously made an incomplete filing and worked with Staff to correct the deficiencies in its initial filing.

Under Puc 405.03(a)(2), MCI was required to file a form T-4, 30 days prior to the transfer date. The purpose of the form is to notify the commission of the transfer and to ensure customers have had adequate advance notice. MCI filed the form on September 22 and has requested that the Commission waive this rule to permit the transfer to take effect on October 10, 2014.

In light of the relatively small number of customer affected in New Hampshire, and especially in light of the early notice previously provided to customers, Staff believes that the concerns of the rule have been addressed, and that a waiver is therefore in the public interest and would facilitate the orderly and efficient implementation of the customer transfer. Accordingly, Staff recommends that the Commission grant the waiver request.