

STATE OF NEW HAMPSHIRE
Before the
PUBLIC UTILITIES COMMISSION

Petition of FairPoint Communications)
for Approval of Simplified Metrics)
Plan and Wholesale Performance Plan)

Docket No. DT 11-061

PETITION FOR INTERVENOR STATUS

In accordance with the Commission's Rules of Practice, PUC 203.17, CRC Communications of Maine, Inc., d/b/a OTT Communications (OTT), hereby petitions the Commission for permission to participate in this proceeding as an intervening party.

OTT is a competitive local exchange carrier in New Hampshire that has interconnection arrangements with FairPoint Communications, Inc. (FairPoint). In order to serve its customers in New Hampshire, OTT utilizes unbundled access to certain wholesale facilities and services from FairPoint as the Incumbent Local Exchange Carrier in New Hampshire. To the extent that FairPoint's provision of these services falls below standards established in the Performance Assurance Plan ("PAP"), OTT receives penalty payments under the terms of the PAP. As such, OTT has interests in this proceeding and its business activities will likely be affected by the issues that will be decided by this proceeding.

For all these reasons, OTT requests that it be allowed to intervene as a party to these proceedings. Please include the following persons on the service list for this docket:

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Respectfully Submitted,



Trina M. Bragdon, Esq.
On the Behalf of
OTT Communications