

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION
DT 11-061

**FAIRPOINT COMMUNICATIONS' PETITION FOR APPROVAL OF
SIMPLIFIED METRICS PLAN AND WHOLESALE PERFORMANCE PLAN**
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 203.17 (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 FairPoint Communications (FairPoint) 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 and its customers.
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 obtain quality wholesale services from FairPoint. BayRing utilizes wholesale services from FairPoint to serve its customers, thus FairPoint's performance measurements connected to these services directly impacts BayRing and its customers.
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.
4. BayRing requests the following individuals to be added to the service list:

Benjamin Thayer	bthayer@bayring.com
Darren Winslow	dwinslow@bayring.com

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
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By: 

Darren Winslow

August 4, 2011