

STATE OF NEW HAMPSHIRE
Before the
PUBLIC UTILITIES COMMISSION

**In re Northern New England Telephone
Operations LLC, d/b/a FairPoint
Communications NNE — Performance
Assurance Plan and Carrier to Carrier Metrics**

DT 11-061

PETITION TO INTERVENE OF OTEL TELEKOM, INC.

Otel Telekom, Inc. (“Otel”) petitions to intervene in this proceeding.

Otel offers competitive local exchange services and other telecommunications services in New Hampshire. It does so in part by obtaining unbundled network elements, interconnection, collocation, and other wholesale services from Northern New England Telephone Operations LLC, d/b/a FairPoint Communications NNE (“FairPoint”).

Otel’s rights, duties, privileges, immunities or other substantial interests may be affected by this proceeding. Otel’s ability to offer services to its customers and the quality of the service it can provide is directly affected by the quality and nondiscriminatory nature of services it receives from FairPoint. FairPoint’s performance in providing unbundled network elements, interconnection, collocation, and other wholesale services is subject to the Carrier-to-Carrier (C2C) Metrics and Performance Assurance Plan (PAP). Otel has an interest in ensuring that the C2C Metrics and PAP adequately measure FairPoint’s performance and provide sufficient incentive for FairPoint to provide high quality, nondiscriminatory service to Otel.

The interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing Otel to intervene. The Commission has just opened this docket, and Otel is

filing this petition in accordance with the schedule that the Commission established in the Order of Notice.

For these reasons, Otel Telekom, Inc. requests that it be permitted to intervene.

Please include the following on the service list for this docket:

Gregory M. Kennan
Fagelbaum & Heller LLP
20 North Main St., Suite 125
P.O. Box 230
Sherborn, MA 01770
508-318-5611 Tel.
508-318-5612 Fax
gmk@fhllplaw.com
jgabor@fhllplaw.com (additional address for electronic copies only)

Mr. Gent Cav
Otel Telekom, Inc.
25 South Maple Street
Manchester, NH 03103
gent@otel.us

August 5, 2011

Respectfully Submitted,

A handwritten signature in black ink, reading "Gregory M. Kennan" followed by a stylized monogram "GK" in parentheses.

Gregory M. Kennan
Fagelbaum & Heller LLP
20 North Main St., Suite 125
P.O. Box 230
Sherborn, MA 01770
508-318-5611 Tel.
508-318-5612 Fax
gmk@fhllplaw.com