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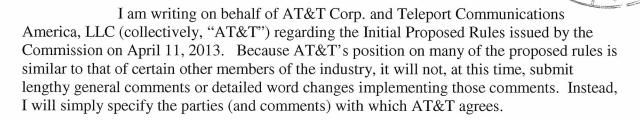
June 11, 2013

Via Electronic Mail and Overnight Delivery

Deborah Howland Executive Director and Secretary NH Public Utilities Commission 21 Fruit Street, Suite 10 Concord, NH 03301

RE: DRM 12-036, Rulemaking Puc 400, Rules for Telephone Service

Dear Secretary Howland:



Specifically, AT&T generally agrees with the comments of Verizon and the New England Cable and Telecommunications Association, Inc. ("NECTA"), arguing that most of the proposed rules would regulate, or have the effect of regulating, VoIP and IP-enabled services in contravention of the plain language of Senate Bill 48 and the Legislature's intent in adopting that bill. AT&T also agrees with the comments of NECTA and Verizon regarding the proposed rules on slamming and cramming (Rules 412.04 and 412.05, respectively). In addition, AT&T agrees with the statements on pages 4-5 of Verizon's comments regarding SB 48's removal of Commission authority over certain aspects of the operations of Excepted Local Exchange Carriers ("ELECs"), including regulation of the network operations procedures of ELECs.

AT&T does offer two changes to the proposed revisions to Puc 415.02 to correct what appear to be typographical errors:

in Puc 415.02(b), replace "Puc 411.06" with "Puc 411.07"; and
in Puc 415.02(e), replace "Puc 418.08" with "Puc 416.08."

Six additional copies of this letter are enclosed. Please let me know if you have questions, and thank you for your assistance.

Yours truly,

James A. Huttenhower

cc: Service List (electronic distribution only)

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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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Docket #: 12-036-1

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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

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.