DEM 12-036

CANNE

CLEC Association of Northern New England

NHPUC 29JAN'14PM12:17

January 27, 2014

Debra Howland, Executive Director
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, N.H. 03301-2429

Re: CANNE Request for Partial Waiver of NH Code of Administrative Rules Puc 433.06, 434.02, 434.03, 434.04 and 449.04 with Respect to CLECs and Puc 454.02, 454.03, 454.04 and 469.04 with Respect to CTPs

Dear Ms. Howland:

I am writing on behalf of the CLEC Association of Northern New England (CANNE) and its members who file annual reports with the Commission.

CANNE and its members have participated in Commission Docket DR 12-036 regarding the promulgation of new rules for telecommunications, and CANNE is aware that JLCAR recently filed a preliminary objection.

One impact of the new rules is that many reports defined in the current rules will no longer be required, for numerous reasons, including that the reports are burdensome for CLECs to assemble, the Commission no longer regulates the services being reported on, the information is not being used by Commission, and/or the information requested is no longer relevant. It appears, however, that new rules may not take effect before the deadline for filing reports nor before our members begin their preparation. Our members do not want to spend time compiling unnecessary reports, and we believe the Staff and the Commission would prefer not to receive and file such reports.

For all the foregoing reasons, CANNE respectfully requests a waiver of the attached list of rules. The Staff, Commission and industry are in agreement that reporting must be reduced and those sections of the proposed rules that revise reporting requirements have not been controversial.

Accordingly, CANNE requests that the Commission grant our request.

Sincerely,

Kath Mullholand
President, CLEC Association of Northern New England

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