DT12-142

NH PUBLIC

UTILITIES COMMISSION

REDACTED



May 29, 2012

ATTORNEYS AT LAW

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BY HAND DELIVERY

Debra A. Howland, Executive Director & Secretary New Hampshire Public Utilities Commission 21 S. Fruit Street, Suite 10 Concord, NH 03301

Merrimack County Telephone Company and Wilton Telephone Company; Re:

Request to Overturn Decision of the North American Numbering Plan

Administrator

Dear Ms. Howland:

On behalf of Merrimack County Telephone Company and Wilton Telephone Company ("TDS"), we are requesting that the Commission overturn a recent decision of the North American Numbering Plan Administrator ("NANPA") denying TDS' request for assignment of two additional central office codes ("NXXs"). The respective NANPA Pooling Administrator Part 3 forms are attached.



In its Order No. 25,210 in Docket No. DT 10-211, dated April 4, 2011, the Commission referenced the Staff Recommendation that 52 percent of telephone numbers in the 603 area code were not in use, and that the projected life of the 603 area code would be extended for 11 years following the number reclamation imposed by the Order.





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Rule 52.15(g)(4) of the Federal Communications Commission provides, in part, that "[t]he state commission also may overturn the NANPA's decision to withhold numbering resources from the carrier based on its determination that the carrier has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies." 47 C.F.R. § 52.15(g)(4). TDS has demonstrated such a need, for which there are no other available remedies.

In addition, it will not contribute to waste or exhaust of numbering resources, based on current projections. As such, good cause exists for the Commission to overrule the NANPA and direct the assignment of the requested codes.

Please note that certain portions of this document are confidential. A request for confidential treatment is being filed concurrently.

A compact disk containing this document is also enclosed.

Very/truly yours,

Harry N. Malone

HNM:kaa

Enclosures