THE STATE OF NEW HAMPSHIRE

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MHPLIC 22JAN/16px4:10

January 22, 2016

Patrick Phipps
Director – Regulatory Affairs
Peerless Network of New Hampshire, LLC
222 South Riverside Plaza, Suite 2730
Chicago, IL 60606

Re: DT 15-530: Peerless Network of New Hampshire, LLC Tariff for Switched Access Service Dear Mr. Phipps:

On December 30, 2015, Peerless Network of New Hampshire, LLC (Peerless) submitted a filing described as an "NHPUC Tariff No. 3 – Switched Access Service."

I am reviewing the proposed tariff and have questions about two rate elements, which may be higher than allowed. (The other rate elements look fine to me.) I believe that Federal Communications Commission (FCC) rules cap competitive carrier rates at the current level of our price-cap carrier, Northern New England Telephone Operations LLC (FairPoint).

Section 5.12 of the proposed tariff lists a rate of \$ 0.001600 for *Tandem Switching*, *Originating*. FairPoint's current rate for this rate element is \$ 0.000503. Section 5.12 also lists a rate of \$ 0.001595 for *Common Trunk Port*, *Originating*. FairPoint's rate for the equivalent rate element is \$ 0.001145.

Please reply to me with either a revision to the proposed tariff that brings these rates below the FairPoint level, or with an explanation of why you believe the rates are allowed under FCC rules.

Sincerely,

Michael C. Ladam

Director, Regulatory Innovation and Strategy

cc:

Service List Docket file

SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED

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 #: 15-530-1 Printed: January 22, 2016

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

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.