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March 26, 2019

VIA Electronic and US MAIL

Debra A. Howland
Executive Director
New Hampshire Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord, NH 03301-2429

RE: Request for a Waiver from N.H. Admin. Rules, Puc 804.01 (a) through (e)

Dear Director Howland:

On behalf of the CenturyLink affiliates Broadwing Communications, LLC, CenturyLink Communications, LLC, Global Crossing Local Services, Inc., Global Crossing Telecommunications, Inc., Level 3 Communications, LLC, Level 3 Telecom Data Services, LLC, and WilTel Communications, LLC, ("CenturyLink"), I hereby request a waiver of Commission Rule 804.01. Pursuant to the requirements set forth in Puc 202.01(d), this letter serves as my request for a waiver.

As required by N.H. Admin. Rules, Puc 804.01 Reporting Requirements for Operators of Underground Facilities, each operator must file a monthly report of probable violations of the underground utility damage prevention program and/or damages to underground facilities. Reports are required to be filed even in months where there are no violations or damages to report. Form E-26 affirmatively requires a "negative report" that "No probable violation of underground utility regulations or damage to underground facilities occurred since the date this company last filed a report as required by Puc 804.01."

CenturyLink has less than 2 miles of underground network in New Hampshire, and has had no damage to those facilities. Submission of a monthly form showing no violation or damage results is onerous considering that less than 2 miles of underground network is at issue. CenturyLink proposes, instead, to file reports in PUC 804.01(a) if damage has occurred and to maintain records of existing underground facility locations pursuant to subsection (f).

Puc 201.05 permits a waiver to be granted when it serves the public interest taking into account that compliance with the rule would be onerous or inapplicable given the circumstances or the purpose is satisfied by an alternative method. As set forth above, the public interest will be served by granting a waiver of Puc 804.01(a) through (e). The existing rule is onerous given the

limited facilities at issue and CenturyLink has proposed an alternative, less burdensome method, committing to file a report if there are violations to report and to maintain records.

If you have any questions, please do not hesitate to contact me at (317)713-8977.

Sincerely,

/s/ Pamela H. Hollick

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