

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

DT 19-___

**Petition of Granite State Communications, Inc. to Modify
Service Territory Boundaries with Northern New England
Telephone Operations LLC d/b/a Consolidated Communications**

Pursuant to RSA 374:30, II, Granite State Telephone, Inc. (“GST”) hereby requests approval from the New Hampshire Public Utilities Commission (“Commission”) to modify certain service territories boundaries, described more fully below, in cooperation with Northern New England Telephone Operations LLC d/b/a Consolidated Communications (“Consolidated” and, with GST, the “Companies”), which supports GST’s request.

As grounds for its request, GST states as follows:

I. Background of the Companies

1. GST is an incumbent local exchange carrier operating as an excepted local exchange carrier whose basic franchise territory includes the Town of Washington and portions of the Town of Chester.

2. Consolidated is an incumbent local exchange carrier operating as an excepted local exchange carrier whose basic franchise territory includes the Town of Stoddard and portions of the Town of Chester.

II. Stoddard-Washington Boundary Modification

3. The first proposed boundary modification concerns customers living and working on the shores of Highland Lake, a body of water whose northern end is located in the Town of

Washington, in Sullivan County, and whose southern end is located in the Town of Stoddard, in Cheshire County.

4. As depicted in **Exhibit A**, the existing service territory boundary between GST and Consolidated (shown as a purple line) is the municipal and county border between the Towns of Washington and Stoddard. Along Highland Lake, GST's basic franchise territory includes customers in the Town of Washington, while Consolidated's basic franchise territory includes customers in the Town of Stoddard.

5. Notwithstanding this basic franchise boundary line, GST has been providing service to customers in the Town of Stoddard along the eastern and western shores of Highland Lake for several decades now.

6. GST's records indicate that, of the GST customers receiving service at locations along Highland Lake in Stoddard, GST has been serving its southernmost customer on the eastern shore of the lake since 1974 and has been serving its southernmost customer on the western shore of the lake since 1975. Service to customers at the other affected locations began even earlier.

7. At all times, Consolidated (and its predecessors) have consented to having GST serve the affected locations along Highland Lake in Stoddard.

8. The present petition seeks a boundary modification between GST and Consolidated so as to bring the affected locations within GST's basic franchise territory.

9. The petition proposes to revise the existing service territory boundary as follows:

Commencing at the municipal and county border between Washington and Stoddard at longitude 72°05'15"W and proceeding due south to latitude 43°07'18"N, then continuing due east to longitude 72°04'55"W, then continuing due south to latitude 43°07'04"N, then continuing due east to longitude 72°04'33"W, then continuing due

north to 43°07'45", an ending point at the municipal and county border between Washington and Stoddard.

Please see the proposed new boundary line identified in red on **Exhibit A**.

10. There are presently approximately 96 locations in the proposed transfer area.

Customers at these locations presently receive service from GST even though the area lies within Consolidated's basic franchise service territory.

11. GST has obtained Consolidated's consent to the proposed boundary modification.

12. Subject to the approval of the Commission, GST and Consolidated have agreed to the transfer of Consolidated's basic exchange franchise obligations in the transferred area. The service boundaries of the Companies would be modified to reflect this agreement and the Commission's approval. The proposed modification does not involve the conveyance of any utility assets between the Companies.

13. As an established local exchange carrier that has served customers in the affected area for more than four decades, GST has the technical, managerial and financial capability of maintaining the obligations of an incumbent local exchange carrier as set forth in RSA 362:8 and RSA 374:22-p.

III. Chester Boundary Modification

14. The second proposed boundary modification concerns a customer location off of Lane Road in the Town of Chester, in Rockingham County.

15. As depicted in **Exhibit B**, the existing service territory boundary between GST and Consolidated in the Town of Chester is located, in material part, at 42°59'45.47"N, 71°15'42.21"W and proceeding easterly to 42°59'43.54"N, 71°15'30.48"W. Please see the current boundary line shown on **Exhibit B**.

16. The subject customer location involves property that is presently bisected by the boundary line of GST and Consolidated, with the northern portion of the property included in Consolidated's franchise territory and the southern portion of the property included in GST's franchise territory. The customer's home, in the southern portion of the property, is served by GST.

17. In 2018, the customer constructed a second home on the property in the northern portion located in Consolidated's franchise territory. The customer requested service to the new location from GST. Consolidated consented to the request in light of the technical and economic efficiencies involved in using GST's existing facilities on the property.

18. The petition seeks a boundary modification between GST and Consolidated so as to bring the customer's new service location within GST's franchise territory.

19. The petition proposes to revise the existing service territory boundary by adding a section of new GST territory, defined as follows:

Commencing at a point on the current exchange boundary at 42°59'45.47"N, 71°15'42.21"W and proceeding north-northeasterly to a point along Lane Road in Chester at 42°59'56.04"N, 71°15'37.86"W and continuing along Lane Road easterly to 42°59'55.11"N, 71°15'32.71"W, then proceeding south-southwesterly to 42°59'51.65"N, 71°15'33.77"W and continuing southeasterly to a point along the current exchange boundary at 42°59'43.54"N, 71°15'30.48"W.

Please see the proposed new boundary line identified in red on **Exhibit B**.

20. There is one customer in the proposed transfer area.
21. GST has obtained Consolidated's consent to the proposed boundary modification.
22. Subject to the approval of the Commission, GST and Consolidated have agreed to the transfer of Consolidated's basic exchange franchise obligations in the transferred area. The service boundaries of the Companies would be modified to reflect this agreement and the

Commission's approval. The proposed modification does not involve the conveyance of any utility assets between the Companies.

23. As an established local exchange carrier, GST has the technical, managerial and financial capability of maintaining the obligations of an incumbent local exchange carrier as set forth in RSA 362:8 and RSA 374:22-p.

IV. Proposed Conditions

24. In furtherance of the aforesaid requests, GST proposes that the Commission grant the requested approval upon the conditions set forth below.

25. First, that GST and Consolidated will file properly annotated tariff pages with the Commission and will also each file two (2) copies of the relevant franchise maps in compliance with the Commission's approval order no later than thirty (30) days from the issuance of such order, as required by N.H. Admin. Rules Puc 1603.02.

26. Second, that GST will cause a copy of the Commission's approval order to be: (a) published once in a statewide newspaper of general circulation or of circulation in those portions of the State where the affected operations are conducted; (b) delivered to the Town Clerks of the Towns of Washington, Stoddard, and Chester, respectively; and (c) delivered to all customers located in the new franchise territory; such publication and service to be accomplished no later than fourteen (14) days from the date of the Commission's approval order and to be documented by affidavit filed with the Commission no later than fourteen (14) days from the date of publication and service.

27. Third, that the Commission shall provide an opportunity for any person interested in this petition to submit written comments and/or offer oral comments to the Commission within a reasonable time following the Commission's approval order.

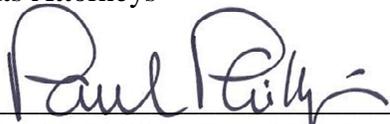
WHEREFORE, GST respectfully requests that the Commission:

- A. Approve the petition to transfer the relevant franchise obligations and modify the territory boundaries are described above, subject to the aforesaid conditions; and
- B. Grant such other relief as is just and appropriate.

Respectfully submitted,

GRANITE STATE TELEPHONE, INC.

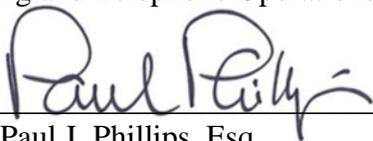
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Certificate of Service

I, Paul J. Phillips, Esq., hereby certify that on the date indicated below, I caused the attached to be served electronically, pursuant to N.H. Admin. Rule Puc 203.11(a)(1), to Staff counsel for the Public Utility Commission, to counsel for the Office of Consumer Advocate, and to an authorized representative of Northern New England Telephone Operations LLC d/b/a Consolidated Communications.

Dated: July 2, 2019


Paul J. Phillips, Esq.