

THE STATE OF NEW HAMPSHIRE

SUPREME COURT

Docket No. 2008-0645

**Verizon New England Inc.
d/b/a Verizon New Hampshire
Northern New England Telephone Operations, LLC
d/b/a FairPoint Communications-NNE**

**Appeal By Petition Pursuant to RSA 541:6
From Final Order of The New Hampshire Public Utilities Commission**

MOTION OF BAYRING AND ONE COMMUNICATIONS

FOR PERMISSION TO FILE A REPLY

**Susan S. Geiger
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**Counsel for Appellees
Freedom Ring
Communications, LLC
d/b/a BayRing Communications**

And

**Choice One of New Hampshire,
Inc., Conversent Communications
of New Hampshire, LLC, CTC
Communications Corp. and
Lightship Telecom, LLC, all d/b/a
One Communications**

May 29, 2009

THE STATE OF NEW HAMPSHIRE

SUPREME COURT

No. 2008-0645

**Appeal of Verizon New England, Inc. d/b/a
Verizon New Hampshire & a.**

MOTION OF BAYRING AND ONE COMMUNICATIONS

FOR PERMISSION TO FILE A REPLY

NOW COME Freedom Ring Communications, LLC d/b/a BayRing Communications (“BayRing”) and One Communications (“One”) (collectively, “Appellees”), by and through their undersigned attorneys, and, pursuant to Supr.Ct.R. 22 (3-A), respectfully move this honorable Court for permission to file a Reply to the Objection to Motions for Rehearing or Reconsideration filed on May 28, 2009 by Verizon New England Inc. d/b/a Verizon New Hampshire and Northern New England Telephone Operations LLC d/b/a FairPoint Communications-NNE. In support of this Motion, the Appellees state as follows:

1. This case involves a complicated telecommunications tariff which was carefully considered below by the New Hampshire Public Utilities Commission (“the Commission”) in a fully litigated proceeding for over two years. This honorable Court swiftly reversed the Commission just one month after oral argument. Because the outcome of this case involves millions of dollars, impacts numerous competitive telecommunications carriers (in addition to the Appellees), and will have serious consequences for the competitive telecommunications market in New Hampshire, the

issues raised in the Motions for Rehearing or Reconsideration warrant additional consideration by the Court.

2. In view of the foregoing, the Appellees respectfully submit that they should be given an opportunity to file a Reply to the Objection.

3. If the Court grants the within Motion, the Appellees intend to file their Reply no later than 5 business days from the date of receiving the Court's order.

WHEREFORE, the Appellees respectfully request that this honorable Court:

A. Issue an order allowing the Appellees to file a Reply to the Objection to Motions for Rehearing or Reconsideration within 5 business days of receipt of said order; and

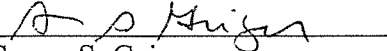
B. Grant such further relief as it deems appropriate.

Respectfully submitted,

FREEDOM RING
COMMUNICATIONS, LLC
D/B/A BAYRING
COMMUNICATIONS and
ONE COMMUNICATIONS
By Their Attorneys,

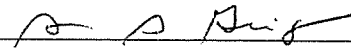
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Date: May 29, 2009

By: 
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CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of May, 2009, copies of the within Motion have been sent by first class mail, postage prepaid to the parties of record, the Executive Director and Secretary of the New Hampshire Public Utilities Commission and to the New Hampshire Attorney General.



Susan S. Geiger

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