

**STATE OF NEW HAMPSHIRE**

**BEFORE THE PUBLIC UTILITIES COMMISSION**

**DT-09-048**

**MOTION TO DISMISS PROCEEDING OR IN THE ALTERNATE STAY THE  
PROCEEDING UNTIL SEVERAL RELATED ISSUES ARE SETTLED**

Pursuant to Section 203 of the New Hampshire Code of Administrative Rules, Union Telephone Company ("Union") files this Motion and respectfully requests that the Commission dismiss the above captioned proceeding. In the alternate, as further described below, Union asks that the Commission stay the proceeding pending resolution of several related issues now pending before the New Hampshire Public Utilities Commission ("Commission") and the New Hampshire Supreme Court. Finally, Union requests postponement of the May 7, 2009 pre-hearing conference for one month or until such time as the issues identified herein have been resolved.

**I. IDT's Initial Demand Letter Was Invalid and the Proceeding Relates to  
Interconnection Because IDT Was Not a Public Utility**

This proceeding relates to an improper demand letter dated October 8, 2008 sent by America Corp. ("IDT") to Union seeking interconnection. IDT's demand letter was invalid because at the time IDT sought interconnection IDT did not hold authority to provide telecommunications services in Union's territory. Indeed, IDT did not receive authority to provide service in Union territory until March 6, 2009. In response to a February 11, 2009 letter from IDT, Union advised IDT of the deficiency and IDT has not and cannot accurately assert

that appropriate authority was in place at the time that the request for interconnection was made. In fact, IDT hurried to remedy their deficiency by immediately applying for certification in Union's service area.

Under the plain meaning of both Section 251 of the Federal Telecommunications Act and the New Hampshire Administrative Code, it is well settled that only telecommunications carriers authorized to operate in the territory of Union are entitled to demand interconnection from Union. Specifically, Section 251(a) states in relevant part that "Each telecommunications carrier has the duty-- (1) to interconnect directly or indirectly with the facilities and equipment of other telecommunications carriers". (emphasis added).<sup>1</sup> Because IDT was not a telecommunication carrier in Union territory at the time that the demand letter was sent, IDT had no right to demand interconnection with Union and Union had no obligation to interconnect with IDT.<sup>2</sup>

Were the Commission to extend interconnection rights to non-carriers (as IDT implicitly requests through the captioned proceeding), it would drastically change the entire interconnection regime, impose significant new burdens on carriers of all types and create substantial new administrative obligations on Staff. At the time that IDT made its request, as an entity unable to operate in Union territory, IDT was no different than any other large end user. Extension of interconnection rights to IDT would therefore essentially extend the ability to require interconnection rights – including the right to seek arbitration before the Commission, to any entity or individual that seeks it. Such rights are well beyond what was intended or exists under existing law.

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<sup>1</sup> 47 U.S.C. §251 ("Section 251"); N.H. Code Admin. R. Ann. 59 PUC §421.01.

<sup>2</sup> Union has previously advised the Commission of the status of IDT's demand letter through its April 7, 2009 filing in this docket

## **II. The Captioned Proceeding Is Unnecessary Because IDT Filed a Formal Pending Request for Interconnection After its Certification.**

In an apparent admission that its previous demand letter was invalid (due to IDT's lack of certification), by letter dated April 24, 2009, IDT recently sent another formal demand letter to Union seeking interconnection. Although IDT knew a hearing on its arbitration was scheduled, they filed a letter after their certification approval by the NHPUC as required, however Union has separately protested the grant of IDT's authority.<sup>3</sup>

Given that IDT has recently sent a new demand letter, and implicitly accepted the timeframes that accompany that request<sup>4</sup>, this interconnection negotiation is not ripe for Commission arbitration and the Commission should not require Union and IDT to conduct interconnection negotiations and proceedings on two tracks simultaneously. Doing so would constitute a gross waste of the parties' resources, as well as the time and effort required by Staff.

Furthermore, in addition to being legally proper, the new negotiation schedule is practically superior. To date, and for the reasons set forth above, no negotiations have taken place. Therefore the parties have not had time to define and narrow which issues, if any, will require arbitration. Therefore, were the Commission to commence arbitration proceedings through this docket, the scope of the arbitration would be unnecessarily broad, encompassing any number of unidentified issues, unnecessarily requiring the expenditure of significant scarce Commission resources to resolve. Accordingly, because IDT has now properly begun the interconnection negotiation process with Union, this proceeding has become unnecessary and redundant and should be dismissed.

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<sup>3</sup> On April 2, 2009, Union filed a Motion with the Commission to rescind IDT's expanded authority and a Motion for rehearing ("April 2<sup>nd</sup> Motion")(Exhibit A). To date, the Commission has not acted on that Motion.

<sup>4</sup> This assumes that the Section 252(b) timeframes apply. As discussed in Union's April 7, 2009 filing in this docket, Union continues to maintain that the timeframes contained in Section 252(b) are inapplicable since interconnection was not sought under Section 251(c).

### **III. Motion for a Stay in the Proceeding**

In the alternative, should the Commission decide not to dismiss this proceeding, Union respectfully submits that the Commission stay the proceeding until certain threshold issues are resolved. Union is willing to negotiate with IDT on interconnection, however that process is currently complicated by a number of factors extraneous to this proceeding. Because those issues will have a direct bearing on IDT's request for interconnection, Union respectfully requests that this proceeding be held in abeyance pending the resolution of the following issues:<sup>5</sup>

#### **A) The Validity of IDT's Expanded Certificate.**

Union respectfully renews its request that the Commission act on Union's April 2<sup>nd</sup> Motion to rescind IDT's expanded authority and for rehearing.<sup>6</sup> The question of whether IDT holds a valid certificate is a threshold issue upon which IDT's right to demand interconnection depends -- IDT is only entitled to demand interconnection with Union if it holds authority to operate as a telecommunications carrier in Union territory.

Section 431.01 of the Telecommunications Rules concerns the registration of CLECs in the territories of "non-exempt ILECs." Although that Rule permits prospective carriers to obtain authority to provide competitive local exchange services, as currently in force, Section 431.01 does not permit the grant of competitive local exchange authority in exempt incumbent local exchange territories. Accordingly, as written, Section 431.01 cannot be used to obtain authority in Union's service territory. Union is aware that the Commission had sought to expand Section 431.01 to encompass certification in exempt incumbent local exchange company territories (including Union's). Recently, however, by letter on April 15, 2009, Thomas Getz of the Commission has rescinded that request "due to questions arising concerning whether the

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<sup>5</sup> This list of issues are not inclusive of all issues raised by Union in its April 2, 2009 Motion.

<sup>6</sup> The Motion is attached as Exhibit A.

proposed form of Puc 431.01 is consistent with RSA 374:22-g".<sup>7</sup> Union asserts that these rules must be developed consistent with state law and properly approved to eliminate questions in the CLEC approval process.

In light of the foregoing, Union respectfully submits that interconnection arbitration proceedings are not timely. Specifically, IDT obtained operating authority within Union territory through Section 431.01 registration. Because Section 431.01 cannot be used to obtain such authority, Union believes that a substantial likelihood exists that IDT's registration in Union territory will be found improper and therefore invalid. In such event, IDT would not be entitled to interconnection with Union and the resources required to conduct the arbitrations could be wasted.

**B) IDT Status as a Common Carrier or a Private Carrier.**

Union's April 2<sup>nd</sup> Motion also asked for clarification as to whether IDT is operating in Union's territory as a common carrier or private carrier. To date, IDT has not confirmed that it intends to operate in Union territory as a common carrier. Private carriers are not entitled to interconnection under Section 251 of the Telecommunications Act. Accordingly, Union respectfully requests that the Commission require IDT to confirm that it will operate as a common carrier in Union's territory prior to initiate proceedings in this docket.

**C) The Validity of the Commission's Granting Expanded Certificates into Union's Service Territory.**

Recently in Docket No. 2009-0168, the Supreme Court of New Hampshire agreed to examine whether the Commission violated its procedural rules when it issued an expanded certificate to MetroCast Cablevision of New Hampshire, LLC ("MetroCast").<sup>8</sup> In doing so, the

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<sup>7</sup> See Exhibit B.

<sup>8</sup> See Supreme Court Docket No. 2009-0168.



Court is expected to resolve numerous salient questions that bear directly on IDT's request for interconnection, including:

1. Was the Grant of Authority in error because the PUC failed to make findings specific to the criteria that RSA 374:22-g requires the PUC to address in providing authority -- particularly the criteria involving consideration of the incumbent telephone utility, Union?

2. Was the Grant of Authority in error due the failure to provide notice and an opportunity for hearing to interested parties and municipalities regarding the MetroCast request for authority?

3. Was the PUC's Grant of Authority in error due to the failure to issue a final order which included findings of fact based upon substantial evidence and conclusions of law regarding the public good?

4. Was the Order on Rehearing in error because it made findings based upon material that was not in the record and for which the PUC had not taken administrative notice?

5. Was the Order on Rehearing in error in finding that no hearing is required in connection with granting authority to operate as a competitive telecommunications utility?

6. Was the Grant of Authority and Order on Rehearing in error in providing MetroCast authority in Union's service territory even though that territory is not territory of a "non-exempt ILEC" (as that term is defined in PUC rules)?

Because IDT received certification in a manner virtually identical to that used by MetroCast, the Supreme Court's resolution of these issues will directly affect the validity of IDT's authority to operate in Union territory.

If the Supreme Court rules that the Commission acted inappropriately and revokes the authority of MetroCast, such a ruling would establish precedent that would invalidate IDT's expanded authority. In that event, there is no reason to have an interconnection agreement between IDT and Union unless IDT has authority to operate in Union territory. Union therefore submits that it is premature for the Commission to take any action that would force an arbitrated agreement upon the parties because such an agreement stands a high probability of being invalidated.

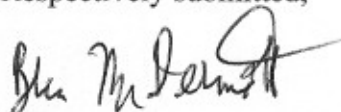
**IV. Motion to Postpone Pre-Hearing Conference**

Finally, pursuant to Section 203.13, Union asks that the Commission postpone the pre-hearing conference now scheduled for May 7, 2009 for one month or until such a point as the issues identified above have been resolved. Union and IDT could not come to an agreement delaying in the pre-hearing conference. As the foregoing makes clear, in numerous instances, numerous threshold legal and procedural issues remain unresolved. Union submits that pushing forward with this proceeding at this time would be counterproductive and a waste of the Commission's resources as well as those of the parties.

**V. Conclusion**

In light of the foregoing, Union respectfully asks the Commission to dismiss the captioned proceeding or, in the alternative, to hold this proceeding, including the hearing now scheduled for May 7, 2009 in abeyance.

Respectively submitted,



Brian McDermott  
Edward S. Quill, Jr.

Counsel for  
Union Telephone Company

Dated: April 30, 2009

Exhibit A



**STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION**

<b>APPLICATION OF IDT AMERICA, CORP.</b>	)	
<b>FOR CERTIFICATION AND ISSUANCE</b>	)	<b>not docketed</b>
<b>DATED March 6, 2009</b>	)	
	)	

**MOTION OF UNION TELEPHONE COMPANY  
TO RESCIND AUTHORITY ISSUANCE, FOR PROCEDURES CONSISTENT  
WITH LAW, AND FOR REHEARING**

Union Telephone Company d/b/a Union Communications ("Union") hereby moves that the authority issued to IDT America, Corp. ("IDT") dated March 6, 2009 be rescinded due to:

1. the failure of the Commission to provide notice to interested parties and municipalities, and to provide an opportunity for hearing, findings of fact and conclusions of law, pursuant to RSA 374:26, 374:22-g 374:22-e, 541-A:31, 541-A:35, and 541-A:39, prior to issuing or authorizing the issuance of such authority; and
2. the failure of the Commission to comply with RSA 363:17-b and RSA 541-A:35 which require the issuance of a final order by the Commission, which order is required to include the parties, their positions, findings of fact, conclusions of law, and an indication of the action of each Commissioner who participated in the matter; and
3. for the other reasons detailed herein.

Union also moves that, to the extent the Commission addresses the IDT application for authority after rescinding the issuance of March 6, 2009, that it follow the legal

requirements for considering such authority, including the requirements listed above and as detailed herein.

To the extent the foregoing is not granted, Union moves for rehearing of the Commission's authority issuance of March 6, 2009 due to the Commission's failure to comply with the legal requirements as detailed above and herein. Failure to comply with such statutes, the Commission's own rules and other errors of law detailed herein deprives Union of its due process rights under those statutes, rules and the US and New Hampshire Constitutions and of equal protection under the laws as guaranteed under the US and New Hampshire Constitutions.

In support hereof, Union states the following:

#### **FACTS**

1. Union is a New Hampshire Corporation and is a public utility as defined in RSA 362:2 that is regulated by the Commission. Union provides telecommunications services to residential and business customers and access services to utilities. Union has less than 7000 access lines. Union is a rural telephone company as that term is defined at 47 USC §153 (37) and as that term is used in 47 U.S.C. § 251 (f)(1). Union has not waived the exemption provided to rural telephone companies under that section of the federal statutes. Union is the incumbent telephone utility serving a territory that includes all or portions of: Alton, Barnstead, Center Barnstead, Farmington, Gilmanton, New Durham, and Strafford, New Hampshire.

2. IDT filed a CLEC application for registration dated February 19, 2009, which was marked amended February 23, 2009. Said application is attached hereto as exhibit 1.

3. On March 6, 2009, the Commission issued a certificate which purports to authorize IDT to provide local exchange service in the geographic areas served by Union. Said certificate is attached hereto as exhibit 2.

4. The Commission did not provide Union with, nor did it issue or require any notice of the application or provide notice of any opportunity for hearing. To the best of Union's knowledge, there was no hearing or opportunity for hearing. The Commission's March 6, 2009 issuance does not contain any findings of fact or conclusions of law. The issuance also contains no finding of public good.

5. The grant of such authority in Union's territory may have an impact upon "the incumbent utilities opportunity to realize a reasonable return on its investments", may have an impact on universal service and may have an impact on meeting carrier of last resort obligations in the Union service territory. Union's rights and privileges are directly impacted by a grant of authority to IDT to provide telecommunications service in the Union service territory.

6. No order was issued by the Commissioners granting authority to IDT in Union's service territory.

7. To the best of Union's knowledge, the municipalities that Union provides service in were not provided notice of the IDT application or approval.

## ANALYSIS AND ARGUMENT

### **I. THE AUTHORITY IS INVALIDLY AND UNLAWFULLY ISSUED AS THE COMMISSION MUST PROVIDE NOTICE TO INTERESTED PARTIES, A HEARING AND FINDINGS OF FACT AND CONCLUSIONS BASED UPON CONSIDERATION OF PARTICULAR FACTORS AS A BASIS FOR ISSUING SUCH AUTHORITY**

The authority issuance of March 6, 2009 involves errors of law because under RSA 374:26, 374: 22-g, 374:22-e, 541-A:31 and other applicable law, the Commission is required to provide for a hearing, make findings based upon evidence before it which address particular factors in those statutes and to make conclusions based on those findings on whether granting IDT application is in the public good. Such evidence findings and conclusions must be specific to the service territory, application and applicant involved in a request for authority.

Actions by administrative agencies that involve the legal rights and privileges of parties, such as the rights of the IDT and the Union (the incumbent telephone utility in this matter), are contested cases as defined by the New Hampshire Administrative Procedure Act. RSA 541-A:1(IV). New Hampshire statutes require adjudicatory procedures which require notice and hearing in such situations. RSA 541-A:1(I), 541-A:31 through 541-A:38. RSA 374:22-e also requires notice to interested parties in actions involving authorizations for more than one telephone utility in a service territory.

RSA 374:22-g explicitly requires the PUC to address the impact of the grant of authority on several criteria, including criteria that involve the incumbent utility (in this case Union), including:

- “carrier of last resort obligations”;

- “the incumbent utility’s opportunity to realize a reasonable return on its investment”; and
- “the recovery from competitive providers of expenses incurred by the incumbent utility to benefit competitive providers.”

Administrative agencies, such as the Commission, must act within their delegated powers. *Appeal of Concord Natural Gas Corp*, 121 N.H. 685, 689 (1981); *Kimball v. N.H. Board of Accountancy*, 118 N.H. 567, 568 (1978). Rules and orders adopted by state agencies may not add to, detract from or in any way modify the statutory law. See *Kimball, supra*. Thus, the Commission’s rules do not in any way limit the legal requirements discussed above as required by RSA 374:26, 374: 22-g, 374:22-e and other applicable law or limit the rights of Union or any other party pursuant to the US and New Hampshire Constitutions.

In docket DT 08-013, *RE: Comcast Phone of New Hampshire, LLC Request for Authority*, ORDER GRANTING HEARING (August 18, 2008), the Commission provided an opportunity for hearing, after previously noticing said matter. In so ruling it stated “[w]e will schedule a hearing pursuant to RSA 374:26, which requires a hearing if all interested parties are not in agreement, to consider evidence by Comcast and other parties concerning whether a grant of franchise authority to Comcast in the KTC, MCT and WTC service territories is for the public good.” Consistent therewith, the New Hampshire Supreme Court has ruled that RSA 374:22-g is an example of the legislature adding conditions to RSA 374:26 – not superseding its requirements. *Appeal Of Public Service Company Of New Hampshire*, 141 N.H. 13, 24-

25 (1996). The recent change in that statute does not relate to the statutes basic requirements and thus this holding remains valid.

In the case at hand, the Commission conducted no inquiry to see if parties were in agreement, and provided no notice to interested parties (such as Union), no procedure to request a hearing and no opportunity for hearing. The treatment provided to Union and others who may be interested in this case is without basis in law and denies Union and other interested parties in this case their due process rights and equal protection of the laws as guaranteed by the statutes discussed above, as well as the US and New Hampshire Constitutions.

**II. THE AUTHORITY IS INVALIDLY AND UNLAWFULLY ISSUED AS THE COMMISSION FAILED TO COMPLY WITH THE REQUIREMENT TO ISSUE A FINAL ORDER**

The application for authority by IDT is a request for authority to operate as a public utility as defined by RSA 362:2 and is governed by RSA 374:26, 374:22- g and 374:22-e. RSA 363:17-b requires the issuance of a final order by the Commission on *all* matters presented to it. That statute requires that such orders reflect, among other things, the parties, the position of the parties and the concurrence or dissent of each commissioner participating in the matter.

Similarly, RSA 541-A:35 requires the Commission to issue final orders in contested cases such as this one which include findings of fact and conclusions of law. In fact, there is no evidence in the issuance that any Commissioner even participated in the issuance of the March 6, 2009 issuance. Thus, the Commission should rescind the issuance of March 6, 2009 issuance.



**III. THE COMMISSION ERRED IN NOT NOTIFYING MUNICIPALITIES OF THE IDT APPLICATION FOR AUTHORITY IN THE MATTER**

RSA 541-A:39 requires that the Commission:

[s]hall give notice to and afford all affected municipalities reasonable opportunity to submit data, views, or comments with respect to the issuance of a permit, license, or any action within its boundaries that directly affects the municipalities. Such action shall include those which may have an effect on land use, land development, or transportation; those which would result in the operation of a business....

Under this provision, the Commission was required to provide notice to municipalities of the IDT application. To the best of Union's knowledge, it did not. This is an additional reason the March 6, 2009 issuance should be rescinded.

**IV. THE AUTHORITY IS INVALIDLY AND UNLAWFULLY ISSUED BECAUSE:THE APPLICATION WAS FILED UNDER COMMISSION RULES 431.01 WHICH DOES NOT APPLY TO UNION'S TERRITORY; AND, IN THE ALTERNATIVE, IF THE RULES DO APPLY, THE APPLICATION FAILED TO COMPLY WITH SUCH RULES.**

The explicit language of Commission rule Puc 431.01<sup>1</sup> and 431.02 provide that the application process in those rules applied only in the territories of non-exempt ILECs, which Union is not. Thus, the application to provide authority in Union's Territory under that rule did not comply with Commission rules and cannot be the lawful basis for an authority application. A lawful application for Petitioner should have been a petition under Commission rules Puc 203.05 and 203.06.

In the alternative, if despite the forgoing, an application under 431.01 was appropriate, the application requirements were not complied with. Commission rule Puc

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<sup>1</sup> At the time of the Commission action and this filing, to the best of Union's knowledge, a potential change to Commission rule Puc 431.01 was pending, but no change is effective under the provisions of RSA 541-A:13. At this time of filing, Union understands that the action of the Commission on this matter is under review in the Joint Legislative Committee on Administrative Rules.

449.07 govern the details of such applications and includes a requirement that “the applicant shall list 3 primary telecommunications services the applicant will offer in New Hampshire.” Commission rule Puc 449.07 (d). The application does not comply with said rule because it only lists one such service.

Thus, the application did not comply with the rules and no waiver was sought or issued related to non-compliance with such rules. Thus, the Commission erred and the application as filed cannot be a lawful basis for the March 6, 2009 authority issuance. Thus, for these reasons, in addition to the reasons provided in sections I through III above, the authority should be rescinded.

**V. THE FORGOING ERRORS OF FACT AND LAW ARE ALSO THE BASIS OF UNION’S MOTION FOR REHEARING PURSUANT TO RSA 541:3**

Union’s motion is also a motion for rehearing pursuant to RSA 541:3. As detailed above, the Commission erred as a matter of law in authorizing the March 6, 2009 issuance. Thus, the issuance should be rescinded and procedures consistent with law, as described above, followed.

**VI. SUBSTANTIAL ISSUES WOULD BE ADDRESSED IN ANY REHEARING**

If the required notice and hearing procedures were followed, Union would inquire into, and submits that the Commission is obliged to inquire into, whether IDT meets the requirements to receive authority as a utility in Union’s territory. In addition to whether the criteria of 374:22-g are met, as discussed above, it is unclear at this point to Union whether IDT will be offering, in Union’ territory, service to the public -- as required in RSA 362:2 – or solely services to one carrier. These are areas of inquiry that Union sees

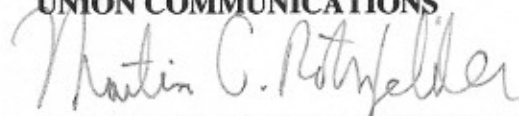
as appropriate. Perhaps other areas of inquiry will arise if the Commission grants rehearing and provides the required opportunity for hearing.

**CONCLUSION**

For the foregoing reasons, the Commission should rescind the authority related issuance of March 6, 2009 involving IDT and rehear the mater in a manner consistent with the legal requirements that apply, as described herein.

Respectfully submitted,

**UNION TELEPHONE COMPANY d/b/a  
UNION COMMUNICATIONS**



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April 2, 2009

**Exhibit B**

April 15, 2009

Scott F. Eaton, Director  
Administrative Rules Division  
Office of Legislative Services  
State House Annex, Room 219  
25 Capitol Street  
Concord, New Hampshire 03301

Re: Notice No. 2008-219  
Puc 402.49 and 431.01, Rules for Telecommunications  
Commission Docket No. 08-126  
Final Proposal Conditional Approval Request

Dear Mr. Eaton:

This letter is to advise you that the Commission intends to ask JLCAR for a conditional approval of this final proposal with the condition that Puc 431.01 not be readopted with amendment as originally requested in the final proposal, but rather remain as it is now. The Commission is withdrawing this proposed readoption with amendment due to questions arising concerning whether the proposed form of Puc 431.01 is consistent with RSA 374:22-g.

Please advise JLCAR that the Commission will make this request at the next scheduled JLCAR hearing on the final proposal on April 17, 2009. We request that the final proposal concerning Puc 402.49 be approved and that no action be taken on Puc 431.01 at this time due to the withdrawal of the amendment.

Please let me know if you have any questions.

Sincerely,

Thomas B. Getz  
Chairman

Enclosures

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