

June 12, 2010

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**VIA U.S. MAIL**

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



Re: DT 10-137; FairPoint Communications - NNE Petition for Authority to Disconnect Service to Global NAPS, Inc.

Dear Ms. Howland:

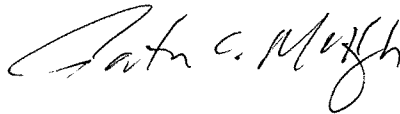
On June 11, 2010 (at approximately 2:25 PM), Global NAPS, Inc. ("Global NAPS") filed its self-labeled Motion of Global NAPS Pursuant to the Commission's June 9, 2010 Order (the "Motion"). Northern New England Telephone Operations LLC d/b/a FairPoint Communications-NNE ("FairPoint") objects to the Motion for several reasons. First, the Motion requests that FairPoint produce certain information within an unreasonable and unjustified time frame, and it is effectively a premature series of data requests. Furthermore, most of the requests relate to Voice over IP and/or Internet traffic, an issue which FairPoint has not raised in its petition. As such, it is FairPoint's position that these requests are not relevant to the issues in the above captioned docket and are nothing more than another attempt to waste Commission resources and time.

The Motion, a total of 82 pages with attachments, also demands that FairPoint provide responses to the data requests/requests for information within seven (7) calendar days. Yet it is well known that Puc 203.07(e) provides that objections to motions shall be filed within ten (10) days of the date a motion is filed. Given also that the Commission has yet to hold a Prehearing Conference or Technical Session in this proceeding, let alone establish a procedural schedule, the Motion is not proper.

FairPoint intends to file its formal objection to the Motion within the time frame permitted by the Commission's administrative rules. Global NAPS provided absolutely no justification within the Motion as why FairPoint's rights under Puc. 203.07 must be limited and why responses to data requests must be provided within seven (7) calendar days. Therefore, FairPoint respectfully requests that the Commission disregard the Motion pending receipt of FairPoint's formal objection.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Patrick C. McHugh". The signature is fluid and cursive, with the first name "Patrick" being more prominent than the last name "McHugh".

Patrick C. McHugh

PCM;kaa

cc: Electronic Service List