### THE STATE OF NEW HAMPSHIRE

#### BEFORE THE

### **PUBLIC UTILITIES COMMISSION**

DT 12-

# PETITION OF COMCAST OF MAINE/NEW HAMPSHIRE, INC. et al. FOR GENERAL LICENSE TO CROSS OVER PUBLIC WATERS

NOW COME Comcast of Maine/New Hampshire, Inc. and its affiliates, Comcast of Connecticut/Georgia/Massachusetts/New Hampshire/New York/North

Carolina/Virginia/Vermont, LLC, Comcast of Massachusetts/New Hampshire, LLC and

Comcast of New Hampshire, Inc. ("Comcast"), the owners of a cable network located in approximately 100 cities and towns within the State of New Hampshire, and, pursuant to RSA 371:17, respectfully request that the New Hampshire Public Utilities Commission

("the Commission") issue a general license to permit Comcast to maintain its existing cables and other wires over and across certain of the public waters of the State of New Hampshire. In support of this Petition, Comcast states as follows:

## Background/Procedural History

1. By Order No. 25, 175 issued November 30, 2010 in Docket DT 10-239, the Commission directed Comcast of Maine/New Hampshire, Inc. to review all of its existing water crossings in New Hampshire to determine whether each crossing requires a license pursuant to RSA 371:17. In addition, the Order directed that "to the extent unlicensed crossings of public waters are discovered, Comcast is expected to comply with RSA 371:17 no later than July 1, 2011."

- 2. Pursuant to Order No. 25, 175, Comcast coordinated with Commission Staff to determine the public water bodies over which Comcast's facilities cross. In December 2010, Staff provided to Comcast a list of all New Hampshire waterways ("Waterway List") in a format compatible with Comcast's Geographical Information System ("GIS") facilities mapping system.
- 3. Led by Mr. Glenn Fiore, Comcast undertook a lengthy and comprehensive evaluation of the more than 600 locations named in the Waterway List. This manually intensive effort began in early March 2011 and was completed on June 24, 2011. In total, approximately 2,500 hours were directed toward this initiative. Comcast summarized its work in a memo provided to Commission Staff on September 23, 2011. Comcast's comprehensive water crossing investigation included the following steps:
- Comcast utilized its internal GIS mapping database that is used to document Comcast's plant and facilities within its cable-franchised footprint in New Hampshire.

  Comcast also engaged a GIS mapping expert consultant to assist in the review.
- Comcast's internal "desktop review" consisted of using its GIS mapping and plant data information in conjunction with a second GIS Source ("Google Maps") to locate each waterway on the Waterway List within Comcast's New Hampshire cable-franchised service area.
- A town-by-town investigation determined where Comcast infrastructure or facilities came within close proximity to any waterway by tracing out each waterway to its extremities. This was a manual process that required review by Comcast of the various GIS screen shots and reference information. The manual desktop review

ultimately identified 465 potential waterway crossings within Comcast's New Hampshire cable-franchised areas which were flagged for further field survey review.

- Comprehensive on-site field surveys were performed at each of the 465 flagged locations. These surveys confirmed whether Comcast facilities crossed waterways in the flagged locations, inventoried the types of cables Comcast has in place over each crossing, and noted whether Comcast's facilities were aerial attachments to utility poles or placed in conduit on bridges. The field surveyors took measurements at every pole, noting clearance distances over the waterway, and the general health of the facilities to insure they were in compliance with all relevant codes. Field surveyors also took digital photographs of each location.
- The field surveys revealed that Comcast has a total of 380 crossings over 174 different bodies of water identified on the Waterway List. A list of these crossings was provided on a confidential basis to Commission Staff at a meeting held on August 18, 2011; sample field survey sketches were provided to Commission Staff with Comcast's September 23, 2011 memorandum.
- 4. On July 1, 2011, Comcast filed a Response and Motion for Enlargement of Time seeking an extension of the deadline established in Order No. 25, 175 so that Comcast and Commission Staff could explore the following issues raised in the Response and Motion:

A. Comcast's current foot print in New Hampshire was created by predecessor companies (Continental Cablevision, MediaOne and AT&T Broadband) and is the result of the acquisition of numerous unrelated cable companies over time, including but not limited to Adelphia, Colony Communications, Harron Communications, Mountain Cable,

American Cablesystems, Community TV Corporation, Time Warner Cable and others. Because the bulk of Comcast's New Hampshire cable network was intially constructed over thirty to forty years ago by these predecessors, it is not clear whether or when petitions for licenses relative to these facilities were filed with the Commission under RSA 371:17.

B. Comcast's (and its predecessors') cable systems in New Hampshire were built many years ago pursuant to an existing framework of federal law, which established a system of franchising for cable systems. All of Comcast's facilities in New Hampshire public ways are constructed, owned and maintained pursuant to its franchise agreements with municipalities. Federal law clearly establishes authority for franchised cable operators to occupy public rights of way and easements dedicated for compatible uses, and to deploy cable plant using existing utility poles, conduit and rights of way. *See* 47 U.S.C. § 541(a)<sup>1</sup>; 47 U.S.C. § 224. State or local requirements that are inconsistent with this federal regime are preempted.<sup>3</sup>

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<sup>&</sup>lt;sup>1</sup> Specifically, Section 621 of the Cable Act, 47 U.S.C. § 541, provides for a system of local franchising. Under the statute, a "franchise" is "an initial authorization, or renewal thereof," issued by a franchising authority to construct or operate a cable system. 47 U.S.C. §522(9). Section 621(a)(2) provides that cable franchises "shall be construed to authorize construction of a cable system over public rights-of-way, and through easements, which is [sic] within the area to be served by the cable system and which have been dedicated for compatible uses."

<sup>&</sup>lt;sup>2</sup> Section 224 of the Cable Act establishes a legal framework for cable operators' use of existing utility poles, conduits and rights of way. Section 224(f) requires electric and telephone utilities give telecommunications carriers access to "any pole, duct, conduit, or right-of-way owned or controlled" by them. Until recently, pole attachments in New Hampshire were governed by federal laws, which dictated the rates, terms and conditions of attachment. The State of New Hampshire certified to regulate poles in 2010 and now the rates, terms and conditions of pole attachments are governed by state laws. See RSA 374:34-a; PUC Rules 1300 et seq. PUC rules include a similar obligation of non-discriminatory access to utility poles, ducts and rights of way. See PUC Rule 1303.01.

See Office of Consumer Counsel and New England Cable and Telecommunications Association, Inc. v. Southern New England Telephone Company d/b/a AT&T Connecticut, Inc. and Department of Public Utility Control of the State of Connecticut, 514 F. Supp. 2d 345 (D. Conn. 2007); Qwest Broadband Services, Inc. v. City of Boulder, 151 F. Supp. 2d 1236 (D. Colo. 2001) (finding statutory scheme that placed franchise approval process in hands of voting electorate to be preempted, and recognizing that "in establishing regulatory guidelines, Congress was concerned both with relieving the cable industry from

C. New Hampshire law authorizes municipalities to award cable television franchises. *See* N.H. RSA 53-C:3. Such municipal franchising authority includes the authority to construct or operate a cable system. *See* RSA 53-C:1, III. In 1974, all existing licenses, permits and other authorizations for a cable system in operation as of April 2, 1974 were deemed to be a franchise. *See* RSA 53-C:5.

D. Cable system plant in New Hampshire was largely built using existing pole infrastructure and the large majority of Comcast's water crossings are constructed aerially using existing poles owned by New Hampshire public utilities. Comcast has license agreements with utility pole owners that govern all of its pole attachments in New Hampshire, requiring all facilities to be built in compliance with specifications of the latest editions of the Bellcore Bluebook of Construction Practices, the National Electric Safety Code (NESC) and the National Electric Code (NEC). Upon information and belief, all of the utilities with whom Comcast has license agreements have been authorized by the Commission for their water crossings. In these circumstances, Comcast believes that all of its water crossings using the poles of New Hampshire public utilities comply with RSA 371:17.

E. In addition to its pole attachment agreements, Comcast holds franchises to serve all of the New Hampshire communities in which it has cable system facilities and in which its water crossings are located. Comcast's franchises in New Hampshire generally authorize Comcast to construct, operate and maintain facilities in "Public Ways," which are defined as public waterways, bridges and public waters located within

unnecessary, burdensome regulation, and with ensuring that cable systems remained responsive to the needs of the public.")

the franchise area. Accordingly, Comcast believes that these franchises and pole attachment agreements provide the requisite authority to cross public waterways.

- 5. The Commission issued a Secretarial letter on August 5, 2011 directing Comcast and Staff to collaborate on the issues filed in the Response and Motion and to provide a status report to the Commission no later than October 1, 2011. On August 18, 2011, representatives of Comcast met with Staff to discuss the issues set forth above. At that time, Comcast provided Staff with the list of 380 locations that Comcast had initially identified as those where its facilities crossed over water bodies named in the Waterway List provided by Staff in December 2010.
- 6. Staff and Comcast filed a status report on September 30, 2011, noting that Comcast had provided Staff with a list of 380 existing water crossing locations along with a written summary of the method Comcast used to undertake a comprehensive review and survey of all of these crossing locations within its New Hampshire cable-franchised territories. The report also indicated that Comcast and Staff agreed to the following: 1) Comcast will supplement its water crossing list with more detailed information about each crossing; 2) instead of litigating the issue of whether RSA 371:17 applied to Comcast's water crossings, Comcast will seek a general license applicable to all existing water crossings included in the above-referenced list; 3) Staff and Comcast will collaborate on developing an appropriate process for the filing and review of a petition for general license; 4) that such petition will be filed without Comcast conceding that that the Commission has authority to require such a filing and without prejudicing Comcast's right to seek a declaratory ruling in the future of the legal issue of whether the Commission has authority under RSA 371:17 over a cable provider; and 5) Comcast and

Staff will continue to discuss these issues with the intention of reaching a settlement agreement that will be filed with the Commission prior to December 31, 2011.

- 7. Comcast continued to collaborate with Staff to refine the initial list of 380 water crossings to include only those that Staff believed were subject to the Commission's review, i.e. crossings over water bodies classified at and above the 4<sup>th</sup> Order River level as set forth in the Official List of Public Waters compiled by the New Hampshire Department of Environmental Services. Comcast and Staff also agreed that Comcast would file with the Commission a petition for general licensure for these crossings, supported by documentation consisting of by survey documents prepared by Precision Valley Communications which include a waterways survey field sketch, location maps, and photographs for each eligible crossing. Comcast and Staff further agreed that such filing by Comcast would be made without conceding the Commission's authority to require such a filing for future crossings and without prejudicing Comcast's right to seek a declaratory ruling in the future on the legal issue of whether the Commission has authority under RSA 371:17 over a cable provider.
- 8. On December 27, 2011, Staff Attorney Lynn Fabrizio filed a letter with the Commission indicating that during the course of Comcast's further discussions with Staff, the parties realized there was a need to refine Comcast's initial list of 380 crossings, as a number of them did not appear to meet the critieria established by the Commission in prior orders for licenses issued under RSA 371:17. In addition, the December 27<sup>th</sup> letter stated that Comcast and Staff have agreed that: 1) Comcast will file a petition no later than February 29, 2012 for a general license covering all existing Comcast crossings in New Hampshire meeting criteria specified in prior Commission

orders, and that are classified at and above the 4<sup>th</sup> Order River level as set forth in the Official List of Public Waters compiled by the New Hampshire Department of Environmental Services; 2) the petition will be supported by survey documents prepared by Precision Valley Communications which include a waterways survey field sketch, location maps, and photographs for each eligible crossing; and 3) the petition will be made without conceding the Commission's authority to require such a filing for future crossings and without prejudicing Comcast's right to seek a declaratory ruling in the future on the legal issue of whether the Commission has authority under RSA 371:17 over a cable provider. The December 27<sup>th</sup> letter also indicated that given the need to refine Comcast's water crossing list, Staff and Comcast propose that they be granted additional time to work on finalizing that list for filing with a general petition by no later than February 29, 2012.

9. By secretarial letter dated January 3, 2012, the Commission extended the deadline to February 29, 2012 for filing the petition for general license as described in Staff December 27, 2011 letter.

# Request for General License

10. In accordance with the above-described agreement with Staff, Comcast submits this Petition for a General License for all of the water crossings identified in Appendix A, submitted herewith. This filing is intended to resolve the issues raised in Order No. 25,175 without conceding the Commission's authority to require this filing, and without prejudice to Comcast's ability to assert in a future proceeding its position concerning the inapplicability of RSA 371:17 to Comcast's facilities.

- 11. In order to meet the reasonable requirements for service to their customers, Comcast and its predecessors, since the 1970's, have installed facilities (e.g. cables and wires) crossing public waters of the state. These facilities were installed within New Hampshire municipalities that have granted Comcast a franchise to construct and operate its cable facilities, and have been placed on the poles of New Hampshire public utilities pursuant to licenses granted by those utilities to Comcast, or within conduit or on bridges pursuant to authority granted by public utilities, municipalities or the New Hampshire Department of Transportation.
- 12. Pursuant to Order No. 25, 175, Comcast has worked with Commission Staff to determine the public water bodies that Staff has determined require the Commission's permission for crossing. As detailed above, Comcast worked diligently to identify its facilities that cross over those public water bodies. A list of the crossing locations for which Comcast seeks approval in this Petition is contained in Appendix A.
- 13. Because the Commission has not promulgated rules to implement the provisions of RSA 371:17, there are no regulatory requirements concerning the type of information needed by the Commission for its review of Comcast's water crossings. Accordingly, in the absence of regulations, Comcast has worked with Commission Staff to determine the information to be submitted with this Petition. Pursuant to its agreement with Staff, Comcast submits herewith, along with a motion for protective order and confidential treatment, two unredacted paper copies and one flash drive containing the following information for each of the water crossings listed in Appendix A: 1) a dated cover page identifying the municipality, water body, water body "order" or level, and street name; 2) Precision Valley Communications waterways field survey report (which

includes pole numbers, a description plant structure and a field survey sketch); 3) a map of the crossing location; and 4) a photograph of the crossing. Also submitted herewith is a third/public copy of the above-described documents containing redactions of very limited information on each Precision Valley Communications report.

- 14. Facilities at each of the crossings listed in Appendix A were constructed by Comcast or its predecessors and will be maintained and operated by Comcast, its affiliates and contractors.
- 15. Comcast submits that the requested license may be exercised without substantially affecting the rights, use of enjoyment of the public in the public water bodies identified in connection with each of the crossings listed in Appendix A. Minimum safe line clearances above the water surfaces and affected shorelines will be maintained at all times. In addition, Comcast is not aware that any party has objected to the water crossings listed in Appendix A. In these circumstances, the Commission may grant this petition without a hearing. *See* RSA 371:20.
- 16. Due to the number of documents submitted with this filing, Comcast respectfully requests, pursuant to N.H. Code of Admin. Rules Puc 201.05, that the Commission waive the requirements Rule Puc 203.02 (a)(1) and allow Comcast to submit one redacted and two unredacted paper copies of the supporting documents. This waiver serves the public interest as compliance with the rule requiring seven copies of the filed documents would be onerous given the unique circumstances presented by the instant proceeding. In addition, the waiver will not disrupt the orderly and efficient resolution of matters before the Commission and may actually promote orderly and efficient resolution

by not inundating the Commission with excessive and duplicative documents.

Commission Staff Attorney Lynn Fabrizio has consented to this waiver request.

WHEREFORE, Comcast respectfully requests that the Commission:

- A. Grant to Comcast a license authorizing Comcast to maintain its existing facilities identified in Appendix A over the corresponding public water bodies identified in said Appendix.
- B. Find that said license may be exercised without substantially affecting the public's rights in the public waters that are the subject of this petition;
- C. Issue an Order *Nisi* and orders for its publication; and
- D. Grant a waiver of N.H. Code Admin. Rules Puc 203.02 (a)(1) as requested herein; and
- E. Grant such further relief as it deems appropriate.

Dated: February 29, 2012

Respectfully submitted,

Comcast of Maine/New Hampshire, Inc. et al.
By their attorneys,
ORR & RENO, P.A.

Ву:

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# Certificate of Service

I hereby certify that on this 29<sup>th</sup> day of February, 2012, a copy of the foregoing petition was sent by electronic mail to Attorney Lynn Fabrizio and the Office of Consumer Advocate.

Susan S. Geiger

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**Comcast**, New Hampshire Waterway Crossings

Comodis	- ITCW Halli	Janie Waterway Cros	Crossing Aerial/	Compact Man		121 4th Order	47 5th Order	21 6th Order	10	14
Town	Region	River / Stream Name	Crossing Aeriai/ UG	Number	Desktop Review Comments	Waterway	Waterway	Waterway	7th Order Waterway	Crossing over Lake or Pond
Allenstown	Greater Boston	Catamount Pond	Aerial	532-509	Comcast Crossing located over Pond	waterway	vvaterway	vvaterway	waterway	X
Amherst	Greater Boston	Baboosic Brook	Aerial	482-492	Crossing is located over 4th Order of Baboosic Brook	Х				
Amherst	Greater Boston	Souhegan River 2 Designated Segment	Aerial/UG	468-491	Crossing(s) located over 4th Order of Souhegan River	Х				
Andover	Western New England	Blackwater River1	Aerial	585-470	Crossing located over 5th Order of Blackwater River		Х			
Andover	Western New England	Blackwater River2	Aerial	585-470	Crossing located over 5th Order of Blackwater River		Х			
Andover	Western New England	Blackwater River3	Aerial	585-470	Crossing located over 5th Order of Blackwater River		Х			1
Andover	Western New England	Cascade Brook 1	Aerial	584-469	Crossing located over 4th Order of Cascade Brook	X				
Andover	Western New England	Cascade Brook (Frazier Brook)	Aerial	588-469	Crossing located over 4th Order of Frazier Brook	X				
Antrim	Greater Boston	Contoocook River - Designated Segment	Aerial	518-465	Crossing located over 6th Order of Contoocook River	V		X		
Antrim	Greater Boston	Great Brook 1	Aerial Aerial	511-461 510-462	Crossing located over 4th Order of Great Brook	X				
Antrim Antrim	Greater Boston Greater Boston	Great Brook 2 Great Brook 3	Aerial	510-462	Crossing located over 4th Order of Great Brook Crossing located over 4th Order of Great Brook	X				
Antrim	Greater Boston	Great Brook 5	Aerial	508-463	Crossing located over 4th Order of Great Brook  Crossing located over 4th Order of Great Brook	X				
Antrim	Greater Boston	Great Brook 7	Aerial	508-463	Crossing located over 4th Order of Great Brook  Crossing located over 4th Order of Great Brook	X				
Auburn	Greater Boston	Massabesic Lake 4 (Dam)	Aerial	498-509	Comcast Crossing is over Massabesic Lake					Х
Auburn	Greater Boston	Massabesic Lake 5 (Dam)	Aerial	498-509	Comcast Crossing is over Massabesic Lake					Х
Auburn	Greater Boston	Massabesic Lake 6 (Dam)	Aerial	498-509	Comcast Crossing is over Massabesic Lake					Х
Auburn	Greater Boston	Sucker Brook 1	Aerial	502-512	Crossing located over 4th Order of Sucker Brook	Х				
Auburn	Greater Boston	Sucker Brook 2	Aerial	501-512	Crossing located over 4th Order of Sucker Brook	Х				
Bennington	Greater Boston	Contoocook River 1	Aerial	505-463	Crossing located over 6th Order of Contoocook River			Х		
Bennington	Greater Boston	Contoocook River 2	Aerial	503-464	Crossing located over 6th Order of Contoocook River			X		
Bow	Greater Boston	Turkey River 1	Aerial	534-497	Crossing located over 4th Order of Turkey River	X				
Bow	Greater Boston	Turkey River 2	Aerial	534-498	Crossing located over 4th Order of Turkey River	X				
Brentwood	Greater Boston	Dudley Brook 2	Aerial	498-539	Crossing located over 4th Order of Dudley Brook	X				
Brentwood Brentwood	Greater Boston Greater Boston	Dudley Brook 2  Exeter River 1	Aerial Aerial	496-540 496-538	Crossing located over 4th Order of Dudley Brook Crossing located over 4th Order of Exeter River	X				
Brentwood	Greater Boston	Exeter River 1  Exeter River 2	Aerial	495-535	Crossing located over 4th Order of Exeter River  Crossing located over 4th Order of Exeter River	, A				
Brentwood	Greater Boston	Exeter River 3	Aerial	495-535	Crossing located over 4th Order of Exeter River	X				
Brentwood	Greater Boston	Exeter River 4	Aerial		Crossing located over 4th Order of Exeter River	X				
Brentwood	Greater Boston	Exeter River 6	Aerial	493-534	Crossing located over 4th Order of Exeter River	X				
Canaan	Western New England	Goose Pond Brook	Aerial	633-452	Crossing located over 4th Order of Goose Pond Brook	Х				
Canaan	Western New England	Mascoma River 2	Aerial	628-455	Comcast Crossing is over 4th Order of Mascoma River	Х				
Canaan	Western New England	Mascoma River 3	Aerial	629-452	Comcast Crossing is over 5th Order of Mascoma River		Х			
Canaan	Western New England	Mascoma River 4	Aerial	627-451	Comcast Crossing is over 5th Order of Mascoma River		Х			
Canterbury	Greater Boston	Merrimack River 1 Designated Segment	Aerial	563-490	Comcast Crossing is over 6th Order of Merrimack River			Х		
Charlestown	Western New England	Connecticut River 1 4th Order	Aerial	556-423	Comcast Crossing is over 7th Order of Connecticut River				Х	
Charlestown	Western New England	Jabes Hackett Brook 3	Aerial	540-421	Comcast Crossing is over 4th Order of Jabes Hackett Brook	X				
Chester	Greater Boston	Exeter River 1	Aerial	494-525	Comcast Crossing is over 4th Order of Exeter River	X				
Claremont	Western New England	Sugar River 1	Aerial	577-431 579-430	Comcast Crossing is over 6th Order of Sugar River			X		
Claremont Concord	Western New England Greater Boston	Sugar River 3  Contoocook River 1	Aerial Aerial	556-492	Comcast Crossing is over 6th Order of Sugar River Comcast Crossing located over 7th Order of Contoocook River				v	
Concord	Greater Boston	Contoocook River 3	Aerial	549-490	Comcast Crossing located over 7th Order of Contoocook River				X	
Concord	Greater Boston	Soucook River 1	Aerial	536-500	Comcast Crossing is over 4th Order of Soucook River	X			^	
Concord	Greater Boston	Soucook River 2	Aerial	539-501	Comcast Crossing is over 4th Order of Soucook River	X				
Concord	Greater Boston	Soucook River 3	Aerial	542-502	Comcast Crossing is over 4th Order of Soucook River	X				
Concord	Greater Boston	Soucook River 4	Aerial	547-503	Comcast Crossing is over 4th Order of Soucook River	Х				
Concord	Greater Boston	Turkey (Turee) Pond	Aerial	534-493	Comcast Crossing is over 4th Order of Sturee Brook	X				
Concord	Greater Boston	Turkey River 2	Aerial	537-495	Comcast Crossing is over 4th Order of Turkey River	Х				
Concord	Greater Boston	Turkey River 3	Aerial	538-494	Comcast Crossing is over 4th Order of Turkey River	Х				
Cornish	Western New England	Connecticut River 1	Aerial	595-427	Comcast Crossing is over 4th Order of Mill Brook	X				
Cornish	Western New England	Mill Brook 2	Aerial	594-428	Comcast Crossing is over 4th Order of Mill Brook	X				
Cornish	Western New England	Mill Brook 3	Aerial	594-429	Comcast Crossing is over 4th Order of Mill Brook	X				
Derry	Greater Boston	Beaver Brook 5	Aerial	476-513	Comcast Crossing is over 4th Order	X	V			
Durham	Greater Boston	Cocheco River 2	Aerial	538-550	Comcast Crossing is over 5th Order of Lamprov Piver		X	V		
Durham Durham	Greater Boston Greater Boston	Lamprey River 1 Lamprey River 2	Aerial Aerial	519-545 519-544	Comcast Crossing is over 6th Order of Lamprey River Comcast Crossing is over 6th Order of Lamprey River			V		
Durham	Greater Boston Greater Boston	Oyster River	Aerial	519-544	Comcast Crossing is over 4th Order of Oyster River	X		^		
Enfield	Western New England	Baltic Mills Dam 1	Aerial	627-448	Comcast Crossing is over 4th Order of Oyster River  Comcast Crossing is over 5th Order of Mascoma River	, A	X			
Enfield	Western New England	Baltic Mills Dam 3	Aerial	627-448	Comcast Crossing is over 5th Order of Mascoma River		X			
Epping	Greater Boston	Pawtuckaway River	Aerial	508-530	Comcast Crossing is over 4th Order of Pawtuckaway River	Х				
Epping	Greater Boston	Lamprey River 1	Aerial		Comcast Crossing is over 5th Order of Lamprey River		Х			
Epping	Greater Boston	Lamprey River 2	Aerial	506-535	Comcast Crossing is over 5th Order of Lamprey River		Х			
Epping	Greater Boston	Lamprey River 4	Aerial	507-535	Comcast Crossing is over 5th Order of Lamprey River		Х			
Epping	Greater Boston	Piscassic River 1	Aerial	505-537	Comcast Crossing is over 4th Order of Picassic River	Х				
Epping	Greater Boston	Piscassic River 2	Aerial	504-535	Comcast Crossing is over 4th Order of Picassic River	Х				
Exeter	Greater Boston	Colcord Pond	Aerial	496-543	Comcast Crossing is over Colcord Pond					Х
Exeter	Greater Boston	Dudley Brook	Aerial	497-541	Comcast Crossing is over 4th Order of Dudley Brook	Х				
Exeter	Greater Boston	Exeter River 2	Aerial	493-542	Comcast Crossing is over 4th Order of Exeter River	X				
Exeter	Greater Boston	Exeter River 3	Aerial	492-544	Comcast Crossing is over 4th Order of Exeter River	X				
Exeter	Greater Boston	Exeter River 4	Aerial	492-545	Comcast Crossing is over 4th Order of Exeter River	X				1

Exeter	Greater Boston	Exeter River 5	Aerial	495-546	Comcast Crossing is over the 5th order of the Squamscott River		Y			
Exeter	Greater Boston	Exeter River 5 (Little River)	Aerial	493-340	Comcast Crossing is over the 5th order of Little River	X	, A			
Exeter	Greater Boston	Little River	Aerial	497-543	Comcast Crossing is over 4th Order of Little River	Х				
Francestown	Greater Boston	South Branch 4 Piscataquog River	Aerial	495-477	Comcast Crossing is over 4th Order of South Branch Piscataquog River	Х				
Francestown	Greater Boston	South Branch 5 Piscataquog River	Aerial	495-477	Comcast Crossing is over 4th Order of South Branch Piscataquog River	X				
Fremont	Greater Boston Greater Boston	Exeter River 1 Exeter River 2	Aerial Aerial	493-531 495-530	Comcast Crossing is over 4th Order of Exeter River  Comcast Crossing is over 4th Order of Exeter River	X				
Fremont Fremont	Greater Boston	Exeter River 4	Aerial	493-530	Comcast Crossing is over 4th Order of Exeter River	X				
Gilsum	Western New England	Ashuelot River - 4th Order 1	Aerial	514-436	Comcast Crossing is over 5th Order of Ashuelot River River	^	Х			
Goffstown	Greater Boston	Black Brook 1	Aerial	509-497	Comcast Crossing is over 4th Order of Black Brook	Х				
Goffstown	Greater Boston	Black Brook 3	Aerial	508-498	Comcast Crossing is over 4th Order of Black Brook	Х				
Goffstown	Greater Boston	Bog Brook 1	Aerial	505-490	Comcast Crossing is over 4th Order of Bog Brook	X				
Goffstown	Greater Boston	Bog Brook 2	Aerial	503-490	Comcast Crossing is over 4th Order of Bog Brook	X	.,			
Goffstown Goffstown	Greater Boston Greater Boston	Piscataquog River 1 Piscataquog River 1A	Aerial Aerial	504-495 504-495	Comcast Crossing is over 5th Order of Piscataquog River  Comcast Crossing is over 5th Order of Piscataquog River		×			
Goffstown	Greater Boston	Piscataquog River 2	Aerial	503-498	Comcast Crossing is over 5th Order of Piscataquog River		X			
Goffstown	Greater Boston	Piscataquog River 4	Aerial	502-498	Comcast Crossing is over 5th Order of Piscataquog River		X			
Goffstown	Greater Boston	Uncanoonuc Lake I (Dam) 1	Aerial	499-493	Comcast Crossing is over Uncanoonuc Dam Pond?					Х
Greenville	Greater Boston	Souhegan River 1	Aerial	458-472	Comcast Crossing is over 4th Order of Souhegan River	X				
Hampstead	Greater Boston	Island Pond 1	Aerial	475-524	Comcast Crossing is over Pond					Х
Hampton	Greater Boston	Hampton River 1	Aerial	484-553	Comcast Crossing is over 4th Order of Taylor River River	X				
Hillsborough Hillsborough	Greater Boston Greater Boston	Beard Brook 2  Contoocook River 1	Aerial Aerial	524-465 525-467	Comcast Crossing is over 5th Order of North Branch River  Comcast Crossing is over 7th Order of Contoocook River		X		Y	
Hillsborough	Greater Boston	Contoocook River 2	Aerial	525-467	Same crossing as Contoocook River #1 (multiple spans)				X	
Hillsborough	Greater Boston	Gould Pond 1	Aerial	531-467	Comcast Crossing is over Gould Pond					Х
Hillsborough	Greater Boston	North Branch River	Aerial	525-463	Comcast Crossing is over 5th Order of North Branch River		Х			
Hinsdale	Western New England	Ashuelot River - 4th Order 2	Aerial	465-416	Comcast Crossing is over 6th Order of Ashuelot River			Х		
Hinsdale	Western New England	Ashuelot River - 4th Order 3	Aerial	465-416	Comcast Crossing is over 6th Order of Ashuelot River			Х		
Hooksett	Greater Boston	Merrimack River Blackwater River	Aerial Aerial	519-503 549-484	Comcast Crossing is over 7th Order of Merrimack River  Comcast Crossing is over 5th Order of Blackwater River				X	
Hopkinton Hopkinton	Greater Boston Greater Boston	Contoocook River 1	Aerial	549-484	Comcast Crossing is over 5th Order of Blackwater River  Comcast Crossing is over 7th Order of Contoocook River				×	
Hopkinton	Greater Boston	Contoocook River 2	Aerial	545-482	Comcast Crossing is over 7th Order of Contoocook River				X	
Hopkinton	Greater Boston	Contoocook River 3	Aerial	539-479	Comcast Crossing is over 7th Order of Contoocook River				Х	
Hudson	Greater Boston	Robinson Pond	Aerial	461-508	Comcast Crossing is over Robinson Pond					Х
Jaffrey	Greater Boston	Cheshire Pond 1	Aerial	468-456	Comcast Crossing is over 4th Order of Contoocook River	X				
Jaffrey	Greater Boston	Cheshire Pond 3	Aerial	469-455	Comcast Crossing is over 4th Order of Contoocook River	X				
Kensington	Greater Boston Greater Boston	Great Brook 1 Country Pond 1	Aerial Aerial	490-544 479-536	Comcast Crossing is over 4th Order of Great Brook  Comcast Crossing is over Country Pond	X				V
Kingston Kingston	Greater Boston	Powwow River 1	Aerial	483-537	Comcast Crossing is over 4th Order of Powwow River	X				
Lebanon	Western New England	Mascoma River 1	Aerial	629-445	Comcast Crossing is over 5th Order of Mascoma River		Х			
Lebanon	Western New England	Mascoma River 2	Aerial	627-442	Comcast Crossing is over 5th Order of Mascoma River		Х			
Lebanon	Western New England	Mascoma River 3	Aerial	628-440	Comcast Crossing is over 5th Order of Mascoma River		Х			
Lebanon	Western New England	Mascoma River 4	Aerial	628-439	Comcast Crossing is over 5th Order of Mascoma River		Х			
Lebanon	Western New England	Mascoma River 5	Aerial	627-439	Comcast Crossing is over 4th Order of Great Brook	X	V			
Lebanon Lebanon	Western New England Western New England	Mascoma River 6  Mascoma River 7	Aerial Aerial	627-437 627-438	Comcast Crossing is over 5th Order of Mascoma River  Comcast Crossing is over 5th Order of Mascoma River		<u>х</u>			
Lebanon	Western New England	Mascoma River 8	Aerial	627-436	Comcast Crossing is over 5th Order of Mascoma River		X			
Lebanon	Western New England	Mascoma River 9	Aerial	627-434	Comcast Crossing is over 5th Order of Mascoma River		X			
Lee	Greater Boston	Lamprey River 1	Aerial	521-541	Comcast Crossing is over 6th Order of Lamprey River			Х		
Lee	Greater Boston	Oyster River 1	Aerial	530-544	Comcast Crossing is over 4th Order of Oyster River	X				
Loudon	Greater Boston	Academy Brook 4	Aerial	570-505	Comcast Crossing is over 4th Order of Academy Brook	X				
Loudon Loudon	Greater Boston Greater Boston	Bumfagon Brook 2  Bumfagon Brook 3	Aerial Aerial	568-504 567-503	Comcast Crossing is over 4th Order of Bumfagon Brook Comcast Crossing is over 4th Order of Soucook River	X				
Loudon	Greater Boston	Soucook River 2	Aerial	556-503	Comcast Crossing is over 4th Order of Soucook River  Comcast Crossing is over 4th Order of Soucook River	X				
Loudon	Greater Boston	Soucook River 3	Aerial	553-503	Comcast Crossing is over 4th Order of Soucook River	X				
Loudon	Greater Boston	Soucook River 4	Aerial	550-504	Comcast Crossing is over 4th Order of Soucook River	Х				
Manchester	Greater Boston	Black Brook 1	Aerial	506-499	Comcast Crossing is over 4th Order of Black Brook	X				
Manchester	Greater Boston	Piscataquog River	Aerial	497-501	Comcast Crossing is over 5th Order of Piscataquog River		X			
Merrimack Merrimack	Greater Boston	Baboosic Brook 4	Aerial	480-499	Comcast Crossing is over 4th Order of Baboosic Brook	X				
Merrimack Merrimack	Greater Boston Greater Boston	Baboosic Brook 2  Baboosic Brook 3	Aerial Aerial	481-498 482-498	Comcast Crossing is over 4th Order of Baboosic Brook  Comcast Crossing is over 4th Order of Baboosic Brook	X				
Merrimack	Greater Boston	Baboosic Brook 5	Aerial	477-499	Comcast Crossing is over 4th Order of Baboosic Brook	X				
Merrimack	Greater Boston	Merrimack River - Designated Segment	Aerial	468-500	Comcast Crossing over 7th order of the Merrimack River				Х	
Merrimack	Greater Boston	Souhegan River 1	Aerial	470-497	Comcast Crossing is over the 5th order of the Souhegan River		Х			
Merrimack	Greater Boston	Souhegan River 2	Aerial	474-497	Comcast Crossing is over the 5th order of the Souhegan River		X			
Merrimack	Greater Boston	Souhegan River 3	Aerial	474-499	Comcast Crossing is over the 5th order of the Souhegan River		X			
Milford Milford	Greater Boston Greater Boston	Souhegan River 1 Souhegan River 3	Aerial Aerial	472-481 472-480	Comcast Crossing is over the 5th order of the Souhegan River  Comcast Crossing is over the 5th order of the Souhegan River		X			
Milford	Greater Boston Greater Boston	Souhegan River 3 Souhegan River Dam	Aerial	472-480	Comcast Crossing is over the 5th order of the Souhegan River  Comcast Crossing is over the 5th order of the Souhegan River		X			
Nashua	Greater Boston	Salmon Brook 3	Aerial	450-501	Comcast Crossing is over the Stir order of the Sourcest River  Comcast Crossing over 4th Order of Salmon Brook	Х	A			
		Nashua River	Aerial	456-501	Comcast Crossing is over the 6th order of the Nashua River			х		
Nashua	Greater Boston	INASITUA NIVEI	Aeriai	430-301	Comeast crossing is over the oth order of the Mashda Miver					
Nashua	Greater Boston	Salmon Brook 4	Aerial	448-500	Comcast Crossing is over 4th Order of Salmon Brook	Х				
					-	X X		<i>x</i>		

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New Boston	Greater Boston	Middle Branch 4	Aerial	506-483	Comcast Crossing is over 4th order of Middle Branch Piscataguog River	X				
New Boston	Greater Boston	Piscataquog River 1	Aerial	491-480	Comcast Crossing is over 4th order of South Branch Piscataguog River	X				
New Boston	Greater Boston	Piscataguag River 2	Aerial Aerial	492-481 494-482	Comcast Crossing is over 4th order of South Branch Piscataguog River	X				
New Boston New Boston	Greater Boston Greater Boston	Piscataquog River 3 Piscataquog River 4	Aerial	494-482	Comcast Crossing is over 4th order of South Branch Piscataguog River Comcast Crossing is over 4th order of South Branch Piscataguog River	X Y				
New Boston	Greater Boston	Piscataquog River 5	Aerial	498-483	Comcast Crossing is over 4th order of South Branch Piscataguog River	Y				
New Boston	Greater Boston	Piscataquog River 7	Aerial	505-487	Comcast Crossing is over 5th order of South Branch Piscataguog River	^	х			
New Ipswich	Greater Boston	Site 14 (Furnace Brook Dam)	Aerial	455-471	Comcast Crossing is over the 4th order of the Souhegan River	Х				
New London	Western New England	Otter Pond 2	Aerial	587-454	Comcast Crossing is over the 4th order of Otter Pond Outlet	X				
Newport	Western New England	Sugar River 4	Aerial	574-444	Comcast Crossing is over 4th order of Sugar River	Х				
Newport	Western New England	Sugar River 5	Aerial	574-444	Comcast Crossing is over 5th order South Branch Sugar River		Х			
Newport	Western New England	Sugar River 6	Aerial	574-444	Comcast Crossing is over 5th order of Sugar River		Х			
Newport	Western New England	Sugar River 7	Aerial	576-444	Comcast Crossing is over 5th order of Sugar River		Х			
Newport	Western New England	Sugar River 8	Aerial	579-442	Comcast Crossing is over 6th order of Sugar River			Х		
North Hampton	Greater Boston	Little River 1	Aerial	492-558	Comcast Crossing is over 4th order of Little River	Х				
North Hampton	Greater Boston	Little River 2	Aerial	492-558	Comcast Crossing is over 4th order of Little River	X				
North Hampton	Greater Boston	Little River 3	Aerial	490-559	Comcast Crossing is over 4th order of Little River	X				
Nottingham	Greater Boston	Bean River 2	Aerial	522-534	Comcast Crossing over 5th Order of North River	.,	Х			
Pelham	Greater Boston	Beaver Brook 1	Aerial	456-511	Comcast Crossing is over 4th order of Beaver Brook	X				
Pelham	Greater Boston	Beaver Brook 2	Aerial	451-513	Comcast Crossing is over 4th order of Beaver Brook	X				
Pelham	Greater Boston	Beaver Brook 3	Aerial	448-513	Comcast Crossing is over 4th order of Beaver Brook	X				
Pembroke Pembroke	Greater Boston Greater Boston	Suncook River 1 Suncook River 2	Aerial Aerial	526-504 531-507	Comcast Crossing is over 5th order of Suncook River Comcast Crossing is over 5th order of Suncook River		X			
Pembroke	Greater Boston Greater Boston	Suncook River 3	Aerial	531-507	Comcast Crossing is over 5th order of Suncook River  Comcast Crossing is over 5th order of Suncook River		X			
Peterborough	Greater Boston	Nubanusit Brook 3	Aerial	481-459	Comcast Crossing is over 5th order of Suncook River  Comcast Crossing located over 5th order of Nubanusit Brook		X			
Peterborough	Greater Boston	Contoocook River 1	Aerial	481-459	Comcast Crossing is over 6th order of Contoocook River			X		
Peterborough	Greater Boston	Contoocook River 2	Aerial	480-461	Comcast Crossing is over 6th order of Contoocook River			X		
Peterborough	Greater Boston	Contoocook River 3	Aerial	477-461	Comcast Crossing is over 6th order of Contoocook River			Х		
Peterborough	Greater Boston	Contoocook River 4	Aerial	476-450	Comcast Crossing is over 6th order of Contoocook River			Х		
Raymond	Greater Boston	Dead Pond	Aerial	505-527	Comcast Crossing over 4th Order of Lamprey River	Х				
Raymond	Greater Boston	Exeter River	Aerial	499-526	Comcast Crossing is over 4th order of Exeter River	Х				
Raymond	Greater Boston	Lamprey River 1	Aerial	512-522	Comcast Crossing over 4th Order of Lamprey River	Х				
Raymond	Greater Boston	Lamprey River 2	Aerial	508-524	Comcast Crossing over 4th Order of Lamprey River	Х				
Raymond	Greater Boston	Lamprey River 3	Aerial	507-526	Comcast Crossing over 4th Order of Lamprey River	Х				
Raymond	Greater Boston	Lamprey River 4	Aerial	507-527	Comcast Crossing over 4th Order of Lamprey River	Х				
Raymond	Greater Boston	Lamprey River 5	Aerial	504-528	Comcast Crossing over 4th Order of Lamprey River	X				
Salem	Greater Boston	Unnamed 1 Stream/River	Aerial	471-523	Comcast Crossing over 4th Order of unnammed stream	Х				
Salisbury (Andover)	Western New England	The Bay	Aerial	583-478	Comcast Crossing over 5th Order of Blackwater River		Х			
Seabrook	Greater Boston	Blackwater River 1	Aerial	474-555	Comcast Crossing over Tidal Water					X
Seabrook	Greater Boston	Blackwater River 2	Aerial	474-555	Same crossing as above (multiple poles)		V			X
South Hampton	Greater Boston	Gardner Lake 2	Aerial	475-544 578-452	Comcast Crossing over 5th Order of Powwow River	V	Х			
Sunapee	Western New England	Sugar River3 B Sugar River4	Aerial Aerial	578-452	Comcast Crossing over 4th Order of Sugar River Comcast Crossing over 4th Order of Sugar River	X V				
Sunapee	Western New England Western New England	Sugar River6	Aerial	577-449	Comcast Crossing over 4th Order of Sugar River					
Sunapee Sunapee	Western New England	Sugar Rivero	Aerial	576-449	Comcast Crossing over 4th Order of Sugar River	X				
Sunapee	Western New England	Sugar River8	Aerial	577-449	Comcast Crossing over 4th Order of Sugar River	X				
Sunapee	Western New England	Sunapee Lake	Aerial	586-454	Comcast Crossing over 4th Order of unnammed river fed from Lake Sunapee	X				
Walpole	Western New England	Cold River 1	Aerial	531-425	Comcast Crossing over 4th Order of Cold River	х				
Walpole	Western New England	Cold River 1-2	Aerial	529-422	Comcast Crossing over 4th Order of Cold River	Х				
Weare	Greater Boston	Daniels Lake 1	Aerial	509-485	Comcast Crossing is over Daniels Lake					Х
Weare	Greater Boston	Middle Branch 2 Piscataquog River	Aerial	508-485	Comcast Crossing os over 4th Order of Piscataquog River-Middle Branch	Х				
Weare	Greater Boston	Perkins Pond Marsh	Aerial	512-479	Comcast Crossing is over Perkins Pond					Х
Weare	Greater Boston	Piscataquog River 3	Aerial	523-478	Comcast Crossing os over 4th Order of Piscataquog River	Х				
Weare	Greater Boston	Piscataquog River 4	Aerial	523-478	Comcast Crossing os over 4th Order of Piscataquog River	Х				
Weare	Greater Boston	Piscataquog River 5	Aerial	523-479	Comcast Crossing os over 4th Order of Piscataquog River	Х				
Weare	Greater Boston	Piscataquog River 6	Aerial	523-479	Comcast Crossing os over 4th Order of Piscataquog River	X				
Weare	Greater Boston	Piscataquog River 8	Aerial	524-481	Comcast Crossing os over 4th Order of Piscataquog River	X				
Weare	Greater Boston	Piscataquog River 9	Aerial	523-482	Comcast Crossing os over 4th Order of Piscataquog River	X				
Weare	Greater Boston	Riverdale Dam	Aerial	508-487	Comcast Crossing os over 4th Order of Piscataquog River	X				
Wilmot	Western New England	Cascade Brook3	Aerial	583-467	Comcast Crossing as over 4th Order of Cascade Brook	X				
Wilmot Wilmot	Western New England	Cascade Brook2	Aerial Aerial	582-467 583-468	Comcast Crossing as over 4th Order of Cascade Brook	X				
Wilton	Western New England Greater Boston	Cascade Brook3 Souhegan River 3	Aerial	583-468 472-479	Comcast Crossing os over 4th Order of Cascade Brook Comcast Crossing is over 5th Oder of Souhegan River	X	v			
Wilton	Greater Boston Greater Boston	Stony Brook 1	Aerial	472-479	Comcast Crossing is over 5th Oder of Sounegan River  Comcast Crossing is over 4th Oder of Stony Brook	х	Α			
Winchester	Western New England	Ashuelot River 1	Aerial	472-479	Comcast Crossing is over 4th Oder of Stony Brook  Comcast Crossing is over 6th Order of Ashuelot River	۸		Y		
Winchester	Western New England	Ashuelot River 2	Aerial	473-427	Comcast Crossing is over 6th Order of Ashuelot River			X		
	Western New England	Ashuelot River 4	Aerial	463-421	Comcast Crossing is over 6th Order of Ashuelot River			X		
Winchester			/ Cliui	100 721	The state of the s					
Winchester Winchester	Western New England	Ashuelot River 6	Aerial	461-424	Comcast Crossing is over 6th Order of Ashuelot River			Х		