Ryan P. Taylor Director - Regulatory NH 770 Elm Street Manchester, NH 03101



Via Hand Delivery

November 9, 2012

Ms. Debra Howland
Executive Director and Secretary
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, New Hampshire 03301



Re: DRM 12-189; Rulemaking Puc 200 – Practice and Procedure; Northern New England Telephone Operations LLC d/b/a FairPoint Communications – NNE ("FairPoint") Comments

Dear Ms. Howland:

This submission is made pursuant to the Order of Notice issued by the New Hampshire Public Utilities Commission (the "Commission") in DRM 12-189 relating to the 200 Rules of Practice and Procedure. In this Docket, the following administrative rules have been identified as rules considered for readoption without amendment: Puc 202.01 (f-m); Puc 204.01 – 204.06; Puc 205.06 and Puc 206.01 – 206.09. Per the Order of Notice, written comments may be submitted through November 15, 2012.

Regarding the identified rules relating to the subject proceeding, the Commission Staff confirmed at the Public Hearing on November 6, 2012, that the following rules have expiration dates of June 10, 2014: Puc 202.01 (f-m); Puc 204.01 – 204.06 and Puc 205.06. In addition, Puc 206.01 – 206.09 has an expiration date of January 27, 2013.

FairPoint notes that the Commission's Part 400 Rules, pertaining to Telecommunications Service, are currently in the process of being revised. These anticipated revisions will need to reflect, among other things, the recent passage of New Hampshire Senate Bill 48, which became effective on August 10, 2012.

Consequently, recognizing that there is a correlation between the instant 200 Rules and the 400 Rules, FairPoint recommends that the Commission revise the scope of DRM 12-189 to only include Puc 206.01 – 206.09 in the current Rulemaking process. FairPoint also recommends that the Commission stay the rulemaking for Puc 202.01 (f-m); Puc 204.01 – 204.06; Puc 205.06 to accommodate the anticipated changes of the Part 400 Rules review.

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Lastly, please consider this as a request to formally add FairPoint as a party to Docket DRM 12-189. Please add myself and Patrick C. McHugh to the service list for this Docket. Our e-mail addresses are as follows:

PMcHugh@FairPoint.com; and RTaylor@ FairPoint.com.

Enclosed is an original and six copies of this submission, as well as a compact disk. Please return the copy of this filing marked "Receipt" with your stamp of receipt.

I am happy to answer any questions regarding this submission and can be reached at 603.656.8102.

Sincerely,

Ryan P. Taylor

Cc: Alexander Speidel

Office of Consumer Advocate

Service List (electronic service only)