



James A. Huttenhower  
General Attorney  
Legal/State Regulatory

225 W. Randolph Street  
Floor 25D  
Chicago, IL 60606  
T: (312) 727-1444  
F: (312) 727-1225  
jh7452@att.com

October 25, 2012

Via Overnight Delivery

Debra A. Howland  
Executive Director  
New Hampshire Public Utilities Commission  
21 S. Fruit Street, Suite 10  
Concord, NH 03301-2429

Re: DT-12-246; Review of Utility Pole Access Issues

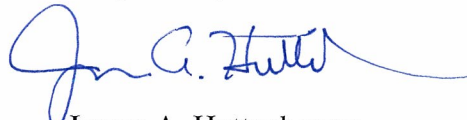
Dear Ms. Howland:

Please find enclosed the original and seven copies of the Comments of AT&T Regarding Rulemaking Proposal for filing in the docket referenced above:

These materials also will be submitted electronically.

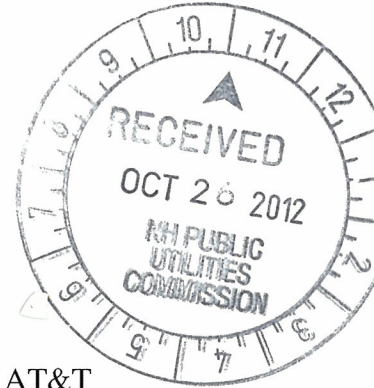
I also enclose a stamped, self-addressed envelope so that you can return one file-stamped copy of the materials to me. If you have any questions regarding these materials, please give me a call.

Respectfully submitted,



James A. Huttenhower

cc: Service List (via electronic mail only)  
Enclosures



DISTRIBUTED

**THE STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION**

**DT 12-246**

**ELECTRIC AND TELEPHONE UTILITIES**

**Review of Utility Pole Access Issues**

**COMMENTS OF AT&T REGARDING RULEMAKING PROPOSAL**

AT&T Corp. and TCG New Jersey, Inc. (collectively “AT&T”) submit the following comments on the future conduct of this proceeding, in response to the October 15, 2012, Secretarial Letter inviting such comments.

On October 10, 2012, the Commission Staff issued a report summarizing the positions expressed at a stakeholder meeting on August 29, 2012, regarding various issues surrounding third-party attachments to utility poles. The report advocated the initiation of a rulemaking regarding third party make-ready work for pole attachments, as well as dispute resolution options for such attachments and the appropriate spacing requirements for new attachments on poles.

AT&T’s operations in New Hampshire primarily involve attaching its facilities to poles owned by other utilities, although it does own a small number of poles in the state. AT&T generally has not encountered substantial problems in making its pole attachments or in dealing with make-ready requests for new attachments. As a result, it does not believe a rulemaking is necessary.

Nevertheless, AT&T recognizes that the Staff report raises issues that, if resolved in a rulemaking, could affect its operations in the future. AT&T therefore asks that the following

persons be placed on the service list in this matter:

James A. Huttenhower  
AT&T Legal Department  
225 W. Randolph Street – Suite 25-D  
Chicago, IL 60606  
Tel: 312-727-1444  
[jh7452@att.com](mailto:jh7452@att.com)

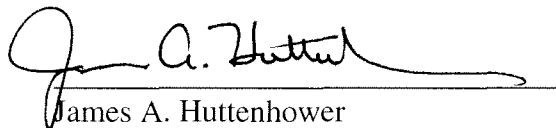
Owen Smith  
AT&T  
400 Southborough Drive  
South Portland, ME 04106  
Tel: (207) 771-8511  
[os5414@att.com](mailto:os5414@att.com)

AT&T intends to monitor future proceedings in this docket and, if appropriate, submit additional comments.

Dated: October 25, 2012

Respectfully submitted,

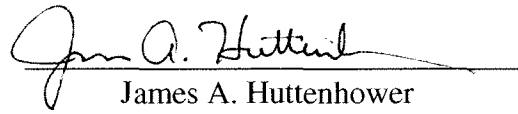
AT&T Corp. and TCG New Jersey, Inc.



James A. Huttenhower  
AT&T Legal Department  
225 W. Randolph Street – Suite 25-D  
Chicago, IL 60606  
Tel: 312-727-1444  
[jh7452@att.com](mailto:jh7452@att.com)

CERTIFICATE OF SERVICE

I hereby certify that on this 26<sup>th</sup> day of October, 2012, a copy of the foregoing Comments of AT&T Regarding Rulemaking Proposal was sent by electronic mail to persons named on the service List of this docket.

  
James A. Huttenhower

CHRISTOPHER J ALLWARDEN  
PUBLIC SVC OF NEW HAMPSHIRE  
780 NORTH COMMERCIAL ST  
PO BOX 330  
MANCHESTER NH 03105  
christopher.allwarden@nu.com

DEAN BENTON  
NEW HAMPSHIRE ELECTRIC COOPERATIVE  
579 TENNEY MOUNTAIN HIGHWAY  
PLYMOUTH NH 03264  
bentond@nhec.com

ROB CARMICHAEL  
NEW HAMPSHIRE OPTICAL SYSTEMS INC  
rcarmichael@nhosystems.com

FRED ANDERSON  
NEW HAMPSHIRE ELECTRIC COOPERATIVE  
579 TENNEY MOUNTAIN HIGHWAY  
PLYMOUTH NH 03264-3147  
anderson@nhec.com

AARON BEQUEATH  
FAIRPOINT COMMUNICATIONS INC  
abequeath@fairpoint.com

CHRISTOPHER H CARTER  
HINCKLEY ALLEN & SNYDER LLP  
11 SOUTH MAIN ST STE 400  
CONCORD NH 03301-4846  
ccarter@haslaw.com

JOHN ANDREWS  
NH MUNICIPAL ASSOC  
PO BOX 617  
CONCORD NH 03302-0617  
jandrews@nhmunicipal.org

ROBERT BERSAK  
PUBLIC SVC OF NEW HAMPSHIRE  
780 N COMMERCIAL ST  
PO BOX 330  
MANCHESTER NH 03105-0330  
robert.bersak@nu.com

SUSAN CHAMBERLIN  
OFFICE OF CONSUMER ADVOCATE  
21 S FRUIT ST STE 18  
CONCORD NH 03301  
susan.chamberlin@oca.nh.gov

KAREN ASBURY  
UNITIL SVC CORP  
6 LIBERTY LANE WEST  
HAMPTON NH 03842-1720  
asbury@unitil.com

MARK BONANNE  
mark.bonanne@sidera.net

PAUL CIANELLI  
NEW ENGLAND CABLE AND TELECOMMUN  
10 FORBES RD STE 440  
BRAINTREE MA 02184  
pcianelli@necta.info

ERIN M AUSTIN  
FAIRPOINT COMMUNICATIONS INC  
1 DAVIS FARM RD FLR 2  
PORTLAND ME 04103  
eaustin@fairpoint.com

LESLIE BROWN  
LIGHT TOWER FIBER LLC D/B/A LIGHTTOWER  
80 CENTRAL ST  
BOXBOROUGH MA 01719  
lbrown@lighttower.com

MARK H COLLIN  
UNITIL SERVICE CORPORATION  
6 LIBERTY LANE WEST  
HAMPTON NH 03842-1720  
collin@unitil.com

GEORGE M BALD  
NH DEPT OF RESOURCES & ECON DEVELOPMENT  
172 PEMBROKE RD  
PO BOX 1856  
CONCORD NH 03302-1856  
george.bald@dred.state.nh.us

STEVEN V CAMERINO  
MCLANE LAW FIRM  
11 SOUTH MAIN ST STE 500  
CONCORD NH 03301  
steven.camerino@mclane.com

KRISTI L DAVIE  
PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE  
PO BOX 330  
MANCHESTER NH 03105  
kristi.davie@nu.com

Docket #: 12-246-1 Printed: October 25, 2012

**FILING INSTRUCTIONS:**

- a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:**

DEBRA A HOWLAND  
EXECUTIVE DIRECTOR  
NHPUC  
21 S. FRUIT ST, SUITE 10  
CONCORD NH 03301-2429

- b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.**

- c) Serve a written copy on each person on the service list not able to receive electronic mail.**

SARAH DAVIS  
FAIRPOINT COMMUNICATIONS INC  
ONE DAVIS FARM RD  
PORTLAND ME 04103  
sdavis@fairpoint.com

JON FREEMAN  
51 DEPOT SQ STE 21  
ST JOHNSBURY VT 05819

CHRIS K HODGDON  
COMCAST CORPORATION  
54 REGIONAL DR  
CONCORD NH 03301  
chris\_hodgdon@cable.comcast.com

MARK W DEAN  
ATTORNEY-AT-LAW  
13 SAMUEL DR  
CONCORD NH 03301  
mdean@mdeanlaw.net

STEVEN FREEMAN  
FAIRPOINT COMMUNICATIONS INC  
sfreeman@fairpoint.com

RORIE HOLLENBERG  
OFFICE OF CONSUMER ADVOCATE  
21 SOUTH FRUIT ST STE 18  
CONCORD NH 03301-2429  
rorie.e.p.hollenberg@oca.nh.gov

ALLEN M DESBIENS  
PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE  
780 N COMMERCIAL ST  
PO BOX 330  
MANCHESTER NH 03105-0330  
allen.desbiens@nu.com

SUSAN GEIGER  
ORR & RENO PC  
ONE EAGLE SQUARE  
PO BOX 3550  
CONCORD NH 03302-3550  
sgeiger@orr-reno.com

STEVEN JANKO  
sjanko@waveguidefiber.com

JENNIFER DUCHARME  
PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE  
780 COMMERCIAL ST  
MANCHESTER NH 03101  
jennifer.ducharme@nu.com

STEPHEN R HALL  
PSNH  
780 N COMMERCIAL ST  
PO BOX 330  
MANCHESTER NH 03105-0330  
stephen.hall@nu.com

DON JOHNSON  
TIME WARNER CABLE  
don.johnson@twcable.com

WILLIAM D DURAND  
NEW ENGLAND CABLE AND TELECOMMUNICATIONS  
10 FORBES RD STE 440W  
BRAintree MA 02184  
wdurand@necta.info

ALAN HANSCOM  
NEW HAMPSHIRE DEPARTMENT OF TRANSPORTATION  
ahanscom@dot.state.nh.us

ROBERT JOHNSON  
LIBERTY UTILITIES  
robert.johnson@libertyutilities.com

GARY EPLER  
UNITIL ENERGY SYSTEMS INC  
6 LIBERTY LANE WEST  
HAMPTON NH 03842-1720  
epler@unitil.com

JOE HARRINGTON  
LIGHT TOWER FIBER LLC D/B/A LIGHT TOWER  
jharrington@lighttower.com

CORDELL A JOHNSTON  
NH MUNICIPAL ASSOCIATION  
PO BOX 617  
CONCORD NH 03302-0617  
governmentaffairs@nhlgc.org

STEPHEN E KAMINSKI  
NEW HAMPSHIRE ELECTRIC COOPERATIVE  
579 TENNEY MTN HWY  
PLYMOUTH NH 03264-3147  
kaminski@nhec.com

M KUSTES  
mkustes@waveguidefiber.com

HARRY N MALONE  
DEVINE MILLIMET & BRANCH PA  
111 AMHERST ST  
MANCHESTER NH 03101  
hmalone@devinemillimet.com

GREGORY M KENNAN  
FAGELBAUM & HELLER LLP  
PO BOX 230  
SHERBORN MA 01770  
gmk@fhllplaw.com

M KUSTES  
mkustes@waveguidefiber.com

HEATHER MANYPENNY  
NEW HAMPSHIRE ELECTRIC COOPERATIVE  
579 TENNEY MTN HWY  
PLYMOUTH NH 032264-3154  
manypennyh@nhec.com

CAROLYN KILLIAN  
NEW ENGLAND CABLE AND TELECOMMUN  
10 FORBES RD STE 440 WEST  
BRAINTREE MA 02184  
info@necta.info

DARREN LACROIX  
NEW HAMPSHIRE OPTICAL SYSTEMS INC  
dlacroix@nhosystems.com

CHRISTINA MARTIN  
OFFICE OF CONSUMER ADVOCATE  
21 SOUTH FRUIT ST STE 18  
CONCORD NH 03301  
christina.martin@oca.nh.gov

SARAH B KNOWLTON  
LIBERTY UTILITIES  
11 NORTHEASTERN BLVD  
SALEM NH 03079  
sarah.knowlton@libertyutilities.com

RACHELLE A LADWIG  
TDS TELECOMMUNICATIONS CORPORATIO  
525 JUNCTION ROAD  
MADISON WI 53717  
rachelle.ladwig@tdstelecom.com

CHRISTIANE G MASON  
LIBERTY UTILITIES  
11 NORTHEASTERN BLVD  
SALEM NH 03079  
christiane.mason@libertyutilities.com

AMY KRAUS  
NEW HAMPSHIRE OPTICAL SYSTEMS INC  
99 PINE HILL RD  
NASHUA NH 03063  
akraus@waveguidefiber.com

RAY LETOURNEAU  
UNITIL SERVICE CORPORATION  
letourneau@unitil.com

PATRICK C MCHUGH  
FAIRPOINT COMMUNICATIONS INC  
770 ELM ST  
MANCHESTER NH 03101  
pmchugh@fairpoint.com

MICHAEL KUSHNIR  
HINCKLEY ALLEN & SNYDER LLP  
mkushnir@haslaw.com

TED LOMBARDI  
NATIONAL GRID  
edward.lombardi@nationalgrid.com

THOMAS P MEISSNER JR  
UNITIL ENERGY SYSTEMS INC  
6 LIBERTY LANE WEST  
HAMPTON NH 03842  
meissner@unitil.com

CAROL MILLER  
DIVISION OF ECONOMIC DEVELOPMENT  
172 PEMBROKE RD  
PO BOX 1856  
CONCORD NH 03302-1856  
carol.miller@dred.state.nh.us

DONALD NOURSE  
PUBLIC SERVICE COMPANY OF NEW HAMF  
donald.nourse@nu.com

SCOTT READ  
TIME WARNER CABLE  
scott.read@twcable.com

DAVID MONTGOMERY  
DUNBARTON TELEPHONE COMPANY INC  
2 STARK HIGHWAY SOUTH  
DUNBARTON NH 03045  
duntelco@gsinet.net

MARIEL NUNES  
NORTHLAND TELEPHONE COMPANY OF M  
1 DAVIS FARM RD  
LEGAL DEPT  
PORTLAND ME 04103

INGO ROEMER  
iroemer@waveguidefiber.com

KATH MULLHOLAND  
SEGTEL INC  
PO BOX 610  
LEBANON NH 03766  
kath@segstel.com

STACEY L PARKER  
COMCAST  
12 TOZER RD  
BEVERLY MA 01915  
stacey\_parker@cable.comcast.com

TERESA R ROSENBERGER  
DEVINE MILLIMET & BRANCH PA  
trosenberger@devinemillimet.com

THOMAS E MURRAY  
TDS TELECOM  
24 DEPOT SQUARE UNIT 2  
NORTHFIELD VT 05663  
thomas.murray@tdstelecom.com

MELINDA POOR  
TIME WARNER CABLE  
melinda.poor@twcable.com

CHUCK SCHMIDT  
TRANSPORTATION DEPT OF  
JO MORTON BLDG  
CONCORD NH 03302-0483  
cschmidt@dot.state.nh.us

STEPHEN NELSON  
DUNBARTON TELEPHONE CO  
2 STARK HIGHWAY SOUTH  
DUNBARTON NH 03045  
scnelson@gsinet.net

SEAN PURCELL  
TELJET LONGHAUL LLC  
spurcell@teljet.com

BRIAN SHEPPERD  
UNIVERSITY OF NEW HAMPSHIRE  
brian.shepperd@unh.edu

ART NICHOLSON  
BRETTON WOODS TELEPHONE COMPANY  
171 MOUNT WASHINGTON HOTEL ROAD  
BRETTON WOODS NH 03575  
anich@bwtc.net

SUSAN RAND KING  
GRANITE STATE TELEPHONE  
600 SOUTH STARK HWY  
PO BOX 87  
SOUTH WEARE NH 03281  
srand@gstnetworks.com

MELISSA SMITH  
NORTHLAND TELEPHONE COMPANY  
11 OSSIPEE TRAIL EAST  
PO BOX 1480  
STANDISH ME 04084



MARK SORGMAN  
LIBERTY UTILITIES  
mark.sorgman@libertyutilities.com

ROJEAN TULK  
FAIRPOINT COMMUNICATIONS INC  
45 FOREST AVE  
PORTLAND ME 04101-2810  
rtulk@fairpoint.com

DARREN R WINSLOW  
BAYRING COMMUNICATIONS  
359 CORPORATE DR  
PORTSMOUTH NH 03801-6808  
dwinslow@bayring.com

SUSAN SOUCIE  
NEW HAMPSHIRE DEPARTMENT OF TRANS  
ssoucie@dot.state.nh.us

SCOTT VALCOURT  
UNIVERSITY OF NEW HAMPSHIRE  
sav@unh.edu

RICHARD WOLLERT  
CONCORD FIRE DEPARTMENT  
rwollert@concordnh.gov

WILLIAM STAFFORD  
GRANITE STATE TELEPHONE  
600 SOUTH STARK HWY  
PO BOX 87  
WEARE NH 03281  
bstafford@gstnetworks.com

SCOTT WADE  
UNITIL ENERGY SYSTEMS INC  
6 LIBERTY LANE WEST  
HAMPTON NH 03842  
wade@unitil.com

FRED STEWART  
UNITIL SERVICE CORPORATION  
6 LIBERTY LANE WEST  
HAMPTON NH 03842-1720  
stewart@unitil.com

ANN WALSH  
DIXVILLE TELEPHONE CO  
450 BEDFORD ST STE 6  
LEXINGTON MA 02420-1512  
awalsh@tillotsoncorp.com

HARRY T STEWART PE  
NH DEPARTMENT OF ENVIRONMENTAL SE  
29 HAZEN DR  
CONCORD NH 03301  
hstewart@des.state.nh.us

KAREN WANTE  
BRETTON WOODS TELEPHONE COMPANY I  
171 MOUNT WASHINGTON HOTEL RAOD  
BRETTON WOODS NH 03575  
bwtelco@worldsurfer.net

RYAN TAYLOR  
FAIRPOINT COMMUNICATIONS INC  
770 ELM STREET  
MANCHESTER NH 03101  
ryan.taylor@fairpoint.com

MAURA WESTON  
NEW ENGLAND CABLE AND TELECOMMUN  
mauraweston@comcast.net