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July 15, 2013

Via Hand Delivery and Electronic Mail

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

Re: IR 13-038 – Stakeholder Review of Utility Assessment Practices

Dear Ms. Howland:

This letter is submitted on behalf of New England Cable and Telecommunications Association (“NECTA”) and its members in response to Commission Staff’s Straw Proposal for Recommendations to the Commission dated July 2, 2013. Your electronic mail message of July 2, 2013 regarding this matter requested written comments on the Straw Proposal, including whether the commenting parties support the Proposal, by July 15, 2013. For the reasons discussed below, NECTA supports only portions of the Proposal.

At the outset, NECTA notes that the July 2nd Straw Proposal fails to mention that a technical session was held on May 29, 2013 or reference the Straw Proposal dated May 23, 2013 which was discussed at that technical session. Of significance to NECTA is that the first bullet point listed in the May 23rd Straw Proposal (recommending the assessment of telecommunications companies based only on their gross intrastate revenues) has been omitted from the July 2nd Straw Proposal. This is troublesome given that the participants in the May 29th technical session were supportive of this point, and there appeared to be no opposition to it. Thus, because the July 2nd Straw Proposal does not contain this recommendation, NECTA does not support the July 2nd Straw Proposal. The reasons for NECTA’s position on not including interstate revenues in the assessment calculus are stated in its letter filed February 15, 2013 in this docket, and NECTA expressly incorporates said letter herein by reference.

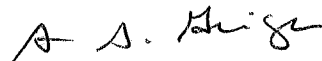
NECTA supports the July 2nd Proposal’s recommendation that a minimum assessment of \$1,000 should be imposed on telephone utilities, as discussed at the May 29, 2013 technical session. NECTA does not support, as drafted, the first recommendation on the second page of the July 2nd Straw Proposal. Of note, this recommendation was not discussed during the May 29 technical session. However, to the extent that this recommendation purports to state that legislation should be pursued to base (note that word is missing from the proposal) telecommunications companies’ assessments upon 33% of their gross intrastate utility revenues,

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in a manner analogous to the treatment of rural electric cooperatives for which a certificate of deregulation is on file with the commission, NECTA could be supportive of this recommendation if it were reworded. NECTA takes no position with respect to the remaining recommendations contained in the July 2nd Straw Proposal.

NECTA appreciates the opportunity to provide the foregoing comments and looks forward to working collaboratively with the Commission, its Staff and other stakeholders to develop appropriate modifications to the current assessment system.

Very truly yours,



Susan S. Geiger

cc: Service List (electronic mail only)
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