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IR 13-038

July 15, 2013

Ms. Deborah Howland
Executive Director and Secretary
NH Public Utilities Commission
21 Fruit Street, Suite 10
Concord, NH 03301

Re: IR 13-038 Stakeholder Review of Utility Assessment System

Dear Ms. Howland:

This letter is submitted on behalf of AT&T Corp. and Teleport Communications America, LLC (formerly known as TCG New Jersey, Inc.) – collectively AT&T – in response to the Staff's Straw Proposal for Recommendations to the Commission, dated July 2, 2013. Because AT&T agrees with certain comments submitted by other parties, AT&T will simply identify the comments with which it agrees, rather than repeating what other parties have argued.

In particular, AT&T agrees with the comments submitted by the New England Cable and Telecommunications Association regarding 1) basing the assessment of telecommunications companies only on their gross intrastate revenues; 2) establishing a minimum assessment of \$1,000 on telephone utilities; and 3) basing the assessment of telecommunications companies upon 33 percent of their gross intrastate revenues, analogous to the current treatment of certain rural electric cooperatives. In addition, AT&T agrees with the "Additional Proposal" in the comments submitted by the New Hampshire Telephone Association that assessments on Excepted Local Exchange Carriers should not include expenses related to the Office of the Consumer Advocate.

AT&T looks forward to continuing to work with the Commission, the Staff, and other parties to update the current utility assessment system. Please let me know if you have any questions.

Yours truly,



James A. Huttenhower

Cc: Service List (electronic mail only)

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