

June 14, 2016

Robert D. Meehan Director - Regulatory NH 770 Elm Street, 1<sup>st</sup> Floor Manchester, NH 03101

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

Re: Northern New England Telephone Operations LLC - Revisions to Tariff NHPUC No. 3 (Intrastate Switched Access Services)

Dear Ms. Howland:

Enclosed, for filing, please find an original and two copies of revisions to Northern New England Telephone Operations LLC ("NNETO") d/b/a FairPoint Communications-NNE ("FairPoint") Tariff NHPUC No. 3. An electronic copy of this filing will be submitted via email today.

This tariff filing is submitted in compliance the ICC reform requirements mandated by the Federal Communications Commission Report and Order in WC Docket No. 10-90, etc., FCC No. 11-161 (released November 18, 2011). Step 6 of the transition requires interexchange carriers including FairPoint to establish intrastate rates effective July 1, 2017 in parity with its interstate rates and rate structure. Accordingly, this tariff filing reduces elements of FairPoint's intrastate access rates to conform to FairPoint's interstate rates which will be filed with the FCC on June 16, for effect July 1, 2017.

FairPoint hereby respectfully requests the Commission waive N.H. Code Admin. Rules Puc 1603.07(a)(1), which requires proposed tariff changes to become effective after 30 days' notice to the Commission and the public, unless the Commission orders otherwise, and Puc 1604.05(d), which requires utilities to file written waiver requests pursuant to Puc 201.05 for authority to implement tariff revisions upon less than 30 days' notice to customers and/or any other applicable rule as the Commission sees fit. FairPoint notes the Commission and the public have been made aware of the required annual rate reductions in switched access rates since 2011. In this instance, however, industry consensus was reached only this week on the application of rate structure changes required in tandem switched transport service rates. This delay prevented FairPoint from submitting its intrastate tariff in a timelier fashion.

In compliance with Step 6 of the ICC reform order NNETO's terminating end office local switching rate element is being reduced to a rate of \$0.000000, in accordance with a bill-and-keep methodology, effective July 1, 2017. Terminating tandem switched transport traffic that is switched by a FairPoint tandem and terminates to a FairPoint-owned end office switch will transition to bill-and-keep by July 2018, with the local transport facility rate element being reduced to a rate of \$0.000000 in 2017 and the tandem switching rate element being reduced to \$0.000700 in 2017 and to \$0.000000 in 2018. In contrast, terminating tandem switched transport traffic that includes an access tandem and end office arrangement in which either the tandem switch or the end office switch, but not both, are owned by a FairPoint Operating Company

ILEC (labeled in the tariff as "3<sup>rd</sup> Party" traffic) will continue to be billed the current tandem rate elements and charges.

The following tariff pages are included in this filing.

NHPUC No. 3	
Section	Revision of Page
1	12
3	3, 5
6	1
30	8, 10

As noted above FairPoint respectfully requests an effective date of July 1, 2017. FairPoint considers these tariff changes administrative as they are consistent with the FCC rules.

Please contact me at 603-656-8116 or via email to <u>robert.meehan@fairpoint.com</u> should you have any question or concern regarding this filing.

Thank you.

Best regards,

Robert D. Meehan

Robert D. Meekan