

STATE OF NEW HAMPSHIRE
Before the
PUBLIC UTILITIES COMMISSION

**Petition of Consolidated Communications)
of Northern New England Company, LLC)
for Approval of Modifications to the)
Wholesale Performance Plan)**

Docket No. DT 19-041

PETITION FOR INTERVENOR STATUS

In accordance with the Commission's Rules of Practice, PUC 203.17, the CLEC Association of Northern New England, Inc., which includes CRC Communications LLC d/b/a OTELCO, FirstLight Fiber, and Biddeford Internet Corp. d/b/a Great Works Internet (collectively "CANNE") hereby petition the Commission for permission to participate in this proceeding as an intervening party.

CANNE is a not for profit association of facilities-based competitive local exchange carriers in Maine, New Hampshire, and Vermont. CANNE members that operate in New Hampshire have interconnection arrangements with Consolidated Communications of Northern New England, LLC ("Consolidated"). In order to serve their customers in New Hampshire, CANNE members utilize unbundled access to certain wholesale facilities and services from Consolidated as the Incumbent Local Exchange Carrier in New Hampshire. To the extent that Consolidated's provision of these services falls below standards established in the Performance Assurance Plan ("PAP"), CANNE's


members receive penalty payments under the terms of the PAP. As such, CANNE members' have interests in this proceeding and their business activities will likely be affected by the issues that will be decided by this proceeding.

For all these reasons, CANNE requests that it be allowed to intervene as a party to these proceedings. Please include the following persons on the service list for this docket:

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Respectfully Submitted,


Trina M. Bragdon, Esq.
On the Behalf of
CANNE

Dated: March 26, 2019