


# STATE OF NEW HAMPSHIRE

## Inter-Department Communication

**DATE:** July 7, 2020  
**AT (OFFICE):** NHPUC

**FROM:**  Kath Mullholand, Director – Regulatory Innovation and Strategy Division

**SUBJECT:** DT 20-100, Dunbarton Telephone Company, Inc.  
Petition to Modify Service Territory Boundaries with Consolidated  
Communications of Northern New England Company, LLC d/b/a  
Consolidated Communications - NNE  
**Staff Recommendation**

**TO:** Commissioners  
Debra A. Howland, Executive Director

**CC:** David K. Wiesner, Director, Legal Division

On June 26, 2020, Dunbarton Telephone Company, Inc. (DTC) filed a petition to modify service territory boundaries with Consolidated Communications of Northern New England Company, LLC d/b/a Consolidated Communications - NNE (Consolidated) pursuant to RSA 374:30, II. According to the petition, DTC proposes that a portion of Consolidated territory be transferred to DTC. Staff notes that Consolidated did not join in the petition, but DTC represents that Consolidated supports the petition and the proposed service territory boundary changes.

The proposed boundary modification concerns ten service locations on Gorham Pond Road located in the Town of Dunbarton. Currently, the service territory boundary between DTC and Consolidated creates a cut-out that deviates from the Town of Dunbarton's municipal boundaries. DTC's telephone exchange departs from the municipal western boundary and runs to the east, cutting across Gorham Pond Road just north of Number 1169 Gorham Pond Road. Immediately east of Gorham Pond Road, the exchange boundary turns to the south and meets up again with the Dunbarton municipal boundary, which it then follows to the east. Customer locations north of 1169 Gorham Pond Road are in DTC's service territory, while locations south of that boundary are in Consolidated's service territory.

DTC proposes to modify the existing service territory boundary by making the exchange boundaries conform to the municipal boundaries that form the southwest corner of the Town of Dunbarton. The proposed boundary modification between DTC and Consolidated would bring 10 affected service locations into DTC's franchise territory.

Ten service locations will be impacted should the Commission grant DTC's request. In addition to gaining access to Internet service from DTC, the customers would

be required to convert any existing telephone service, as those customers presently located in Consolidated's territory are served by the Goffstown exchange (603-497) and would now be in DTC's territory served by the Dunbarton exchange (603-774). Thus, customers with landline telephone service in the affected area will require a change in their landline telephone numbers. In addition, customers in the affected area who have a presubscribed toll carrier for their landline service may need to select a different toll carrier. Finally, the local calling areas are different for the Goffstown exchange and the Dunbarton exchange, which may affect customers' bills, depending on the customer's normal calling patterns. DTC commits to working with the affected customers to ensure a smooth transition of any landline services they continue to receive.

DTC requests that the Commission act expeditiously on its request, which originated from a petition for service signed by the residents living in nine of the ten affected service locations in Dunbarton that was addressed to the Dunbarton Town Clerk. *See Exhibit DTC-1.* In the cover letter that accompanied their petition, the petitioners assert that their lack of service has been exacerbated by the State's stay-at-home orders issued in response to the Covid-19 pandemic. Accordingly, DTC is requesting expedited treatment of its petition, asking that the Commission waive any requirements for a prehearing, public hearing, or merits hearing; waive any publication requirement for an Order of Notice, in light of the actual notice DTC has given to all affected customers in this proceeding; and deem the prospective customers' petition as public comments sufficient to satisfy the Commission's requirements.

Staff agrees with DTC that it is an established incumbent local exchange carrier, and that it has a record of demonstrated technical, managerial, and financial capability sufficient to maintain the obligations of an incumbent local exchange carrier, as set forth in RSA 362:8 and RSA 374:22-p.

Staff has reviewed the DTC petition and exhibits and recommends that the Commission approve the petition by order *nisi*, requiring DTC and Consolidated to file properly annotated tariff pages with the Commission, along with two (2) copies of the relevant franchise maps, no later than fifteen (15) days from the effective date of the order, as required by N.H. Admin. R., Puc 1603.02. Staff recommends that DTC be directed to publish a copy of the order *nisi* on its website and to provide a copy to each of the ten customers affected by the boundary change, as well as to the town clerk of the Town of Dunbarton.