

SMITH & DUGGAN LLP

ATTORNEYS AT LAW

TWO CENTER PLAZA
SIXTH FLOOR
BOSTON, MA 02108-1906
TEL 617.228.4400
FAX 617.248.9320

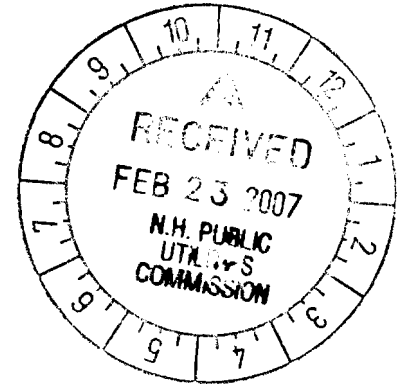
ALAN D. MANDL
AMANDL@SMITHDUGGAN.COM
DIRECT DIAL: 617.228.4464
LINCOLN OFFICE

LINCOLN NORTH
55 OLD BEDFORD ROAD
LINCOLN, MA 01773-1125
TEL 617.228.4400
FAX 781.259.1112

February 22, 2007

BY OVERNIGHT MAIL AND ELECTRONIC MAIL

Ms. Debra A. Howland
Executive Director and Secretary
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, New Hampshire 03301-2429



Re: Docket No. DT 07-011
VERIZON NEW ENGLAND, INC.,
BELL ATLANTIC COMMUNICATIONS,
INC., NYNEX LONG DISTANCE
COMPANY, VERIZON SELECT SERVICES,
INC. AND FAIRPOINT COMMUNICATIONS,
INC. Joint Application for Approvals Related to
Verizon's Transfer of Property and Customer
Relations to Company to be Merged with and
into FairPoint Communications, Inc.

Dear Ms. Howland:

Enclosed please find for filing in the above-captioned matter an original and eight (8) copies of the Joint Petition to Intervene of the New England Cable and Telecommunications Association, Inc. and Comcast Phone of New Hampshire, LLC.

Also enclosed is an additional copy of the Joint Petition. Please date stamp and return this additional copy to me for my files in the enclosed stamped, self-addressed envelope.

An electronic version of the enclosed filing also is being made with the Commission. Copies of the enclosed filing are being served upon all parties on the Commission's service list in this matter by first class mail, postage prepaid, and by email.

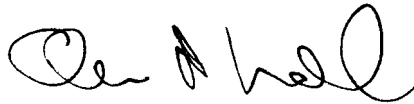
As counsel for NECTA and Comcast Phone of New Hampshire, LLC, I am a member of the bars of the Commonwealth of Massachusetts and State of Rhode Island and in good standing

Ms. Debra A. Howland
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in each jurisdiction. I agree to abide by the Commission's rules of practice and procedure, any orders of the Commission and any agreements between the parties in accordance with Puc 203.16.

Thank you for your assistance in this matter.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Alan D. Mandl". The signature is fluid and cursive, with the first name "Alan" being more prominent and the last name "Mandl" following in a similar style.

Alan D. Mandl

Enclosures
cc: Commission Service List
Office of Consumer Advocate

**STATE OF NEW HAMPSHIRE
BEFORE THE NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION**

Re: VERIZON NEW ENGLAND, INC.,
BELL ATLANTIC COMMUNICATIONS,
INC., NYNEX LONG DISTANCE
COMPANY, VERIZON SELECT SERVICES,
INC. AND FAIRPOINT COMMUNICATIONS,
INC. Joint Application for Approvals Related to
Verizon's Transfer of Property and Customer
Relations to Company to be Merged with and
into FairPoint Communications, Inc.

**DOCKET NO. DT07-011
FEBRUARY 22, 2007**

**JOINT PETITION TO INTERVENE OF THE NEW ENGLAND CABLE
AND TELECOMMUNICATIONS ASSOCIATION, INC., AND COMCAST
PHONE OF NEW HAMPSHIRE, LLC**

Pursuant to RSA 541-A:32, New Hampshire Code of Administrative Rules Puc 203.02 and Puc 203.17, and the February 7, 2007 Order of Notice of the Commission, the New England Cable and Telecommunications Association, Inc. ("NECTA") and Comcast Phone of New Hampshire, LLC ("Comcast Phone") hereby jointly petition to intervene in the above-captioned proceeding. In support of their Joint Petition, NECTA and Comcast Phone state as follows:

1. NECTA is a non-profit corporation with principal offices located at Ten Forbes Road, Suite 440 West, Braintree, Massachusetts 02184.
2. NECTA is the principal trade association in New England for operators of cable systems in all New England states, including New Hampshire.
3. NECTA members provide cable service within New Hampshire and attach

to distribution facilities owned and maintained by Verizon in order to deliver cable service to their subscribers.

4. Some NECTA members have expressed interest in providing telecommunications services in New Hampshire. Therefore, NECTA members in New Hampshire (or affiliates) are keenly interested in the effect of the proposed transactions in New Hampshire.

5. Comcast Phone has a business address at 1500 Market Street, 17 West, Philadelphia, PA 19102.

6. Comcast Phone has obtained authorization from the Commission to provide intrastate telecommunications services within New Hampshire.

7. Comcast Phone has entered into an interconnection agreement in New Hampshire with Verizon pursuant to Section 251 of the federal Telecommunications Act of 1996. *See, e.g., Verizon New Hampshire/AT&T Broadband Phone of New Hampshire, LLC, Order Approving Adopted Interconnection Agreement (Order No. 24,141 dated March 17, 2003).*

8. Comcast Phone depends upon interconnection arrangements with Verizon under reasonable rates, terms and conditions in order to operate efficiently in New Hampshire and is specifically and substantially affected by any transaction that would adversely impact existing or future interconnection arrangements.

9. The terms and conditions of any transfer by Verizon to any entity seeking to acquire, operate and maintain the telecommunications facilities of Verizon within New Hampshire therefore would specifically and substantially affect the interests of Comcast Phone as well as NECTA members and affiliates.

10. Future rates, terms and conditions of interconnection and related services provided today by Verizon, such as transport services and access to numbering resources, may be affected by the outcome of this proceeding, depending upon the regulatory status of the entity that proposes to acquire, operate and maintain Verizon's existing facilities.

11. NECTA and Comcast Phone are concerned that, any successor entity should be required to assume the existing obligations that Verizon now has in New Hampshire as an Incumbent Local Exchange Carrier so that the foundation upon which facilities-based competitive local exchange carriers have depended in entering the New Hampshire market and committing capital to offer consumers a choice in service providers is not undermined.

12. Any approval of the Joint Petition should be conditioned upon the successor corporation being treated as an incumbent local exchange carrier for purposes of the federal Telecommunications Act, Section 251(c), without any exemption or suspension of obligations under Sections 251(f)(1) and 251(f)(2) and for other purposes related to its wholesale obligations.

13. The Joint Petition contains no specific commitment that the terms and conditions of Verizon's interconnection agreement with Comcast Phone will be honored. Although Comcast Phone is in receipt of a letter dated February 12, 2007, from Verizon Partner Solutions and FairPoint Communications in which it proposes that Verizon's existing interconnection agreement with Comcast Phone will be assigned to the successor entity after the closing of the proposed transactions, the Joint Application makes no promises how interconnection agreement relationships would be governed going forward after the expiration of the term of any existing interconnection agreement.

14. The Joint Petition contains no commitments regarding other existing obligations of Verizon, such as its lengthy Statement of Generally Available Terms and Conditions (“SGAT”),.

15. NECTA and Comcast Phone also are concerned about the effect of the Transition Services Agreement, provided with the Joint Petition without publicly available Exhibits, upon the reliability and economics of services that they now provide in New Hampshire. The adequacy of services to enable seamless consumer choice of competing service providers and the costs of those services are of critical importance to New Hampshire consumers and Verizon’s current and future competitors.

16. The assumption by the successor entity of Verizon’s prior commitment to expand the availability of broadband facilities in New Hampshire could adversely impact broadband deployments by NECTA members as well as the reliability of existing service if Verizon’s successor does not commit adequate resources to the construction, operation and maintenance of existing distribution facilities on which NECTA members depend.

18. The Joint Petition does not adequately address the pole attachment rates, terms and conditions, as being considered in DM 05-172, to be implemented by the successor entity at the outset and going forward or the ability of the successor entity to meet Verizon’s current obligations.

19. The Joint Application does not explain what will happen regarding Verizon’s Section 271 obligations in New Hampshire if the Joint Application is approved. This issue needs to be investigated.

20. The Distribution Agreement filed with the Joint Application leaves a number of services outside the scope of services to be handled by “Spinco.” How these

services will be provided, whether they will be provided adequately, at what costs, and with what impacts upon NECTA members and Comcast Phone are all concerns to NECTA and Comcast Phone.

21. The interests of NECTA, its members and member affiliates and Comcast Phone will not be adequately protected by other parties. Incumbent LECS and CLECs cannot adequately protect their interests. Similarly, the Office of Consumer Advocate does not stand in the shoes of NECTA or Comcast Phone and may well pursue a settlement of issues which does not adequately protect their interests.

22. NECTA and Comcast Phone also are uniquely situated to present to the Commission relevant information that cannot be presented by other interested parties, given their unique status as facilities-based service providers impacted by the Joint Petition.

23. Alternative means by which NECTA and Comcast Phone's interests can be protected do not exist because this matter is the only proceeding in which the Commission has the opportunity to investigate the impacts of the proposed transactions upon competition within New Hampshire.

24. The joint intervention by NECTA and Comcast Phone will not unduly delay this proceeding or prejudice the interests of existing parties or the public. NECTA and Comcast Phone's joint intervention will help streamline the conduct of this proceeding.

25. NECTA has demonstrated in prior proceedings that it is able to make valuable contributions to the record upon which the Commission makes its decisions without creating undue delay or prejudicing the interests of existing parties and the

public. Given the public importance of this proceeding to the future of cable and telecommunications services and competition within New Hampshire, it is critical that the Board allow NECTA and Comcast Phone to intervene jointly as key stakeholders in the outcome of this proceeding.

26. While NECTA and Comcast Phone have tentatively identified a number of concerns about the Joint Petition and its direct, specific and substantial effects upon them, they will need to review any pre-filed testimony to be submitted by the Joint Petitioners and conduct discovery in order to determine the precise issues that they will need to raise. Based upon such pre-filed testimony discovery responses, NECTA and Comcast Phone will determine whether the submission of pre-filed testimony will be necessary in order to present evidence to the Commission and protect their interests. NECTA and Comcast Phone reserve the right to submit pre-filed testimony, cross examine the Joint Petitioners and other witnesses and submit a brief. Of course, NECTA and Comcast Phone will remain open to discussion with the Joint Petitioners and other parties in accordance with Puc 203.15.

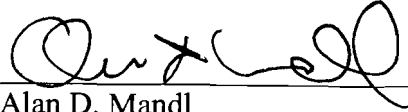
27. Please add to the paper copy and electronic service lists in this docket the undersigned counsel for NECTA and Comcast Phone (Alan D. Mandl).

For the above reasons, NECTA and Comcast Phone request that they be permitted to intervene as full parties in this matter.

Respectfully submitted,

NEW ENGLAND CABLE AND
TELECOMMUNICATIONS ASSOCIATION,
INC. AND COMCAST PHONE OF NEW
HAMPSHIRE, LLC

By its attorneys,



Alan D. Mandl
Smith & Duggan LLP
Lincoln North
55 Old Bedford Road
Lincoln, MA 01773
(T) (617) 228-4464
(F) (781) 259-1112
amandl@smithduggan.com

Dated: February 22, 2007