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May 15, 2007



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

Re: DT 07-027, TDS Telecommunications Corporation/Merrimack  
County Telephone Company  
Alternative Form of Regulation

Dear Ms. Howland:

Please find enclosed original and eight copies of Petition For Late Intervention on behalf of Ross Patnode. A copy is also being sent by email to the Commission and to all parties listed below. Please note that TDS/MCTC, Staff, OCA and the parties do not object to the late intervention of Mr. Patnode.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "Alan Linder".

Alan Linder  
Attorney for Petitioner Ross Patnode

AL:blg

Enclosures

Cc (w/encl.):

Frederick Coolbroth, Esquire  
Anne Ross, Esquire  
Rorie Hollenberg, Esquire  
Susan Geiger, Esquire  
Daniel Feltes, Esquire  
Ross Patnode

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State of New Hampshire  
Public Utilities Commission

DT 07-027

TDS Telecommunications Corporation/Merrimack County Telephone Company  
Alternative Form Of Regulation

**Petition For Late Intervention**

Petitioner, Ross Patnode, moves for late intervention in this proceeding, pursuant to Rule Puc 203.17 and RSA 541-A:32, II, and states as follows:

1. Petitioner, Ross Patnode, resides in Hillsborough, New Hampshire.
2. Petitioner is a residential customer of TDS Telecom/Merrimack County Telephone Company (MCTC), a wholly-owned subsidiary of TDS Telecommunications Corporation (TDS Telecom).
3. Petitioner has a limited income, and he and the members of his household will be affected by an increase in TDS Telecom/MCTC's residential basic local exchange rates.
4. Petitioner has an interest in this proceeding as a residential customer of TDS Telecom/MCTC.
5. Petitioner does not have access to competitive basic local exchange service.
6. Petitioner seeks to assure universal access to affordable basic service.
7. The rights, duties, privileges, and other substantial interest of Petitioner may be affected by this proceeding.
8. Petitioner seeks to intervene as a full party intervenor in this proceeding.
9. Petitioner agrees to be bound by all protective orders with respect to treatment of confidential information and documents.
10. Petitioner is aware that this petition is being filed after the May 1, 2007 deadline for filing for intervention as set forth in the Order of Notice dated April 10, 2007.


11. Petitioner agrees to abide by the procedural schedule set by the Commission for this proceeding.

12. The granting of this Petition for Late Intervention is in the interest of justice, will not impair the orderly and prompt conduct of this proceeding, will not result in delay, and will not prejudice the interest of any party.

13. Counsel for Petitioner contacted counsel for TDS Telecom/MCTC, counsel for Staff, the OCA and all parties to this proceeding. Counsel for TDS Telecom/MCTC, counsel for Staff, the OCA and other parties do not object to this late petition for intervention. Counsel for TDS Telecom/MCTC reserves the right, however, to object with regard to standing to the extent issues arise that are unique to a company or an exchange that does not serve Petitioner Ross Patnode.

WHEREFORE, Petitioner, Ross Patnode, requests that the Commission grant him leave to intervene as a full party intervenor in this proceeding.

Respectfully submitted  
Ross Patnode, Petitioner  
By His Attorney

  
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Alan Linder  
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[dfeltes@nhla.org](mailto:dfeltes@nhla.org)

5/15/07  
Date

Certification of Service

I certify that on this date I mailed and emailed a copy of the within Petition to Frederick Coolbroth, counsel for TDS Telecom/MCTC, Anne Ross, counsel for Staff of the Commission, Rorie Hollenberg, Office of the Consumer Advocate, and Susan Geiger, counsel for Intervenor, segTel.



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Alan Linder  
Attorney for Petitioner

Date: 5/15/07