## Before the DEPARTMENT OF TELECOMMUNICATIONS AND CABLE Commonwealth of Massachusetts

CRC COMMUNICATIONS LLC, D/B/A OTELCO,

Complainant,

v.

File No. DTC-22-4

MASSACHUSETTS ELECTRIC COMPANY D/B/A NATIONAL GRID, AND VERIZON NEW ENGLAND INC.

Respondents.

## MOTION OF SUSAN STITH TO APPEAR PRO HAC VICE

I, Susan Stith, respectfully move for leave to appear pro hac vice as counsel to Complainant CRC Communications LLC, d/b/a OTELCO ("OTELCO") in the abovecaptioned proceeding. I am an attorney with the law firm Davis Wright Tremaine LLP, and I am a member in good standing with the Bars in the State of Texas, the State of California, and the District of Columbia. In addition, I have significant experience representing cable, telecommunications, and broadband service providers in matters related to infrastructure deployment, including with regard to pole attachments and access to public rights-of-way. I have previously litigated matters before state regulatory bodies in Texas, Louisiana and Wisconsin, and regularly represent clients in a variety of telecommunications related proceedings across the country. WHEREFORE, I respectfully request that I be permitted to appear pro hac vice.

Respectfully submitted,

/s/ Susan Stith Susan Stith Davis Wright Tremaine LLP 1301 K Street NW, Suite 500 East Washington, D.C. 20005 202-973-4228 (Direct Phone) 202-973-4200 (Main Phone) SusanStith@dwt.com

Date submitted: February 21, 2023

## **CERTIFICATE OF SERVICE**

I hereby certify that on February 21, 2023, I electronically served the foregoing

document by email only, in accordance with the requirements of 220 CMR § 1.05(1) on

the following:

National Grid Attn: Joy Banks Manager, Third Party Attachments 40 Sylvan Road Waltham, MA 02451 Joy.banks@nationalgrid.com Tel.: 617-949-6134 (sent via email)

National Grid Attn: Commercial Legal Legal Department 40 Sylvan Road Waltham, MA 02451

Verizon New England, Inc. Manager – License Administration Group 6 Bowdoin Sq Floor 6 Boston, Massachusetts 02114 Attention: Terrence Toland Title: Agreement Manager Tel.: 978-372-4018 Terrence.Toland@one.verizon.com (sent via email)

> /s/ Susan Stith Susan Stith