COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Petition by Verizon New England Inc. for)	
Amendment of the Cable Division's Form 500)	D.T.C. 08-12
"Cable Operator's Annual Report of Consumer)	
Complaints")	

PETITION FOR PARTY STATUS OF NEW ENGLAND CABLE AND TELECOMMUNICATIONS ASSOCIATION

Introduction

Pursuant to 220 C.M.R. § 1.03 and the March 27, 2009 Order of Notice ("Order") issued by the Department of Telecommunications and Cable ("Department"), the New England Cable and Telecommunications Association, Inc. ("NECTA") hereby petitions to intervene as a party in the above-captioned docket. As grounds therefor, NECTA states as follows:

Background

- 1. NECTA is a non-profit corporation and trade association that represents the interests of most cable operators in the New England states, including Massachusetts.
- 2. NECTA has offices located at 10 Forbes Road, Suite 440W, Braintree, Massachusetts 02184.
- 3. NECTA has on many occasions represented the interests of its members in proceedings conducted by the Department as a party.
- 4. Through franchise agreements with municipalities, NECTA member companies own and operate community antenna television ("CATV" or "cable") systems and

provide cable television services and other telecommunications services in their respective franchise areas in the Commonwealth.

5. NECTA member companies in the Commonwealth are obligated to furnish data to the Department in the annual Form 500 filing. NECTA has also participated in the 2006-07 requests by the petitioner to change disclosure requirements applicable to data submitted in connection with the Form 500. As such, the legal rights, duties and privileges of NECTA and its members are substantially and specifically affected by the amendments to the Form 500 proposed by the petitioner.

6. NECTA anticipates participating in this docket consistent with its party status. Copies of all pleadings and other materials should be provided to the following:

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7. NECTA does not have Initial Comments to submit at this time but plans to attend the May 15, 2009 public hearing and reserves rights to provide Reply Comments or participate in other proceedings in this docket as appropriate.

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Accordingly, NECTA respectfully requests that the Department grant its petition for party status in this proceeding.

Respectfully submitted,

NEW ENGLAND CABLE AND TELECOMMUNICATIONS ASSOCIATION, INC.

By its attorneys,

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Date: May 1, 2009