

THE ADAMS LEGAL FIRM, LLC

1474 NORTH POINT VILLAGE CENTER #301
RESTON, VA 20194

TELEPHONE
(703) 738-4812

FACSIMILE
(757) 273-1120

TAMBER RAY
Of Counsel

626C ADMIRAL DRIVE #312
ANNAPOLIS, MD 21401

TELEPHONE
(202) 448-9033

FACSIMILE
(202) 448-9040

JOHN B. ADAMS
Member

RICHARD M. TETTELBAUM
Of Counsel

February 22, 2008

VIA OVERNIGHT DELIVERY

Catrice Williams, Secretary
Department of Telecommunications & Cable
Commonwealth of Massachusetts
One South Station
Boston, MA 02110

RE: D.T.C. 07-9; Petition for Investigation under chapter 159, Section 14 of the
Intrastate Switched Access Rates of Competitive Local Exchange Carriers

Dear Ms. Williams:

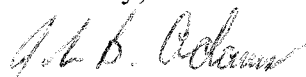
Please find enclosed an original and four copies of the Petition to Intervene of Richmond Connections, Inc. d/b/a Richmond NetWorx and Richmond Telephone Company in the above-referenced proceeding. Per the Department's Notice of Public Hearing dated January 14, 2008, an electronic copy was filed today.

A stamp-and-return copy also is enclosed. Please mark it as received and mail it to the undersigned in the enclosed postage-paid envelope.

Finally, a check in the amount of one hundred dollars (\$100.00) is enclosed to cover the filing fee for this petition.

Thank you for your assistance with this matter.

Sincerely,


John B. Adams

Enclosure

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Petition for Investigation under Chapter 159,)	
Section 14 of the Intrastate Switched Access)	
Rates of Competitive Local Exchange Carriers)	D.T.C. 07-9
)	

**PETITION TO INTERVENE OF
RICHMOND CONNECTIONS, INC. D/B/A RICHMOND NETWORX AND RICHMOND
TELEPHONE COMPANY**

Richmond Connections, Inc. d/b/a Richmond NetWorx (“Richmond NetWorx”) and Richmond Telephone Company (“Richmond Telephone”) (together “Richmond”), by counsel, respectfully submit this Petition to Intervene pursuant to 220 C.M.R. § 1.03(1) and in accordance with the Notice of Public Hearing dated January 14, 2008 (“Notice”) regarding the Petition for Investigation under Chapter 159, Section 14 of the Intrastate Switched Access Rates of Competitive Local Exchange Carriers (“Petition”) filed by Verizon New England, Inc. and affiliated companies (collectively, “Verizon”). In support of this Petition, Richmond states as follows:

1. Richmond NetWorx is a competitive local exchange carrier (“CLEC”) providing service within the portion of Verizon’s service area located in Berkshire County. Its business address is Suite 120, 75 North Street, Pittsfield, Massachusetts 01201.
2. Richmond Telephone is an incumbent local exchange carrier (“ILEC”) serving a portion of Berkshire County. Its business address is Suite 120, 75 North Street, Pittsfield, Massachusetts 01201.

3. Richmond NetWorx is a wholly-owned subsidiary of Richmond Telephone.

4. Both Richmond NetWorx and Richmond Telephone are substantially and specifically impacted by this proceeding in that the Petition seeks to cap intrastate access charges assessed by Richmond NetWorx. Further, as discussed in more detail in the written testimony being filed jointly in this proceeding by Richmond NetWorx and Richmond Telephone, the implication of Verizon's (erroneous) interpretation and application of G.L. c. 159, § 14 is that all local exchange carriers, including ILECs like Richmond Telephone, must charge the same intrastate access rates as Verizon. Richmond NetWorx also is a party to D.T.C. 08-2 which is a complaint proceeding regarding Verizon's efforts to force Richmond NetWorx to cap its intrastate access rates on the basis of the interconnection agreement between Richmond NetWorx and Verizon.

5. Both Richmond NetWorx and Richmond Telephone oppose the Petition. Their written testimony identifies contradictory legal arguments Verizon has presented in this proceeding and in D.T.C. 08-2 as well as factual errors in the implicit premise underlying the Petition. They also discuss how adoption of the proposal set forth in the Petition would violate the requirement in G.L. c. 159, § 14 that rates "yield reasonable compensation for the service rendered."


6. In their written testimony, Richmond NetWorx and Richmond Telephone present evidence demonstrating the inconsistencies in Verizon's legal arguments and demonstrate that Richmond NetWorx's costs to provide service are higher than Verizon's costs such that Verizon's rates would not yield reasonable compensation.

7. Richmond NetWorx and Richmond Telephone seek denial of the Petition.

Respectfully submitted,

RICHMOND TELEPHONE COMPANY and
RICHMOND CONNECTIONS, INC. d/b/a
RICHMOND NETWORX

By Counsel:

A handwritten signature in cursive script, appearing to read "J. B. Adams", is written over a horizontal line.

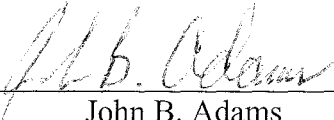
John B. Adams, Esq.
The Adams Legal Firm, LLC
626C Admiral Drive #312
Annapolis, MD 21401
202-448-9033 (tel)
202-448-9040 (fax)

Their Attorney

February 21, 2008

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing "Petition to Intervene" in D.T.C. 07-9 was served upon the following via first class mail, postage prepaid, this 22nd day of February, 2008.



John B. Adams

Bruce P. Beausejour
Verizon
185 Franklin St. – 13th Floor
Boston, Massachusetts 02110-1585

Richard Fipphen
Verizon
27th Floor, Verizon Building
140 West Street
New York, NY 10007