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State of New Jersey  
DIVISION OF RATE COUNSEL  
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CHRIS CHRISTIE  
Governor

KIM GUADAGNO  
Lt. Governor

STEFANIE A. BRAND  
Director

January 7, 2014

Kristi Izzo - Board Secretary  
New Jersey Board of Public Utilities  
44 South Clinton Avenue, 9<sup>th</sup> Floor  
P.O. BOX 350  
Trenton, New Jersey 08625-0350

**Re:** I/M/O the Petition of the United Telephone Company of New Jersey, Inc.,  
d/b/a CenturyLink – Petition for Relocation of CenturyLink’s Flemington  
Office.  
**BPU Docket No. TO13100985U**

Dear Ms. Izzo:

Enclosed please find Rate Counsel’s Comments regarding the above matter. Kindly date  
stamp one copy and return in the self addressed Interoffice envelope provided.

Thank you,

*Gabrielle Pichler*  
Gabrielle Pichler  
Legal Assistant  
Division of Rate Counsel

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service list copy*

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1/10/14



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*Director*

January 7, 2014

**Via Electronic and Regular Mail**

Kristi Izzo, Board Secretary  
New Jersey Board of Public Utilities  
44 South Clinton Avenue, 9<sup>th</sup> Floor  
P.O. Box 350  
Trenton, New Jersey 08625-0350

Re: I/M/O the Petition of the United Telephone Company of New Jersey, Inc.,  
d/b/a CenturyLink – Petition for Relocation of CenturyLink’s Flemington  
Office.  
**BPU Docket No. TO13100985U**

Dear Secretary Izzo:

The New Jersey Division of Rate Counsel (“Rate Counsel”) has reviewed the above referenced Petition of the United Telephone Company of New Jersey, Inc., d/b/a CenturyLink, (“CenturyLink”) requesting permission from the Board of Public Utilities (“Board”) to relocate a local business office located in Flemington and relocate the office to an existing office in Clinton. Rate Counsel submits the within comments on this matter for the Board’s consideration. Enclosed with this original please find ten copies, as well as a self-addressed and prepaid postage stamped envelope. Kindly return a date/stamped “Received” and/or “Filed” copy to Rate Counsel. For the reasons that follow, Rate Counsel does not object to approval of CenturyLink’s request for permission to relocate the Flemington office to the new Clinton office location.

After review of the CenturyLink’s Petition, exhibits and filing, Rate Counsel is satisfied that the office closure and relocation from Flemington to Clinton will not unduly prejudice the public interest and meets the standards set forth by *N.J.A.C. 14:3-5.1*.

In its Petition, CenturyLink asserts that the office closure of the Flemington business office is reasonable as the Clinton location offers more convenient, and more accessible parking

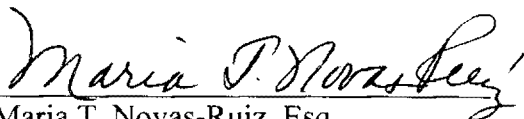
for customers. Furthermore, the Clinton location is approximately only 11.25 miles from the Flemington office location and can easily continue to serve customers from the congruent areas of Hunterdon, Sussex and Warren counties. The Clinton office will offer customers the same services as those offered in Flemington. In addition, customers may also contact and access CenturyLink for services and payment through both the toll-free number and CenturyLink's website, making it possible for customers to continue to have the same ease of service as at the Flemington office location.

As required by *N.J.A.C. 14:3-5.1(e)(2)*, CenturyLink posted the Public Notice of the proposed office closing at the subject locations and provided notice to the public via newspaper publication in local area newspapers.<sup>1</sup> Additionally, notice was sent to the Municipal Clerks for the affected area towns with the Board's contact information and alerting that comments regarding CenturyLink's Petition for closure of the subject business office.<sup>2</sup> Rate Counsel notes that to date no written municipal or customer comment or objection has been filed with the Board in response to any of the notices posted or mailed in this matter.

Therefore, after review of the application and supplemental information provided by CenturyLink in its Petition, responses to discovery propounded by the Board, Rate Counsel has no objection to the Board's approval of CenturyLink's request under the Petition.

Sincerely,

**STEFANIE A. BRAND, ESQ.**  
**Director, New Jersey Division of Rate Counsel**

By:   
Maria T. Novas-Ruiz, Esq.  
Assistant Deputy Rate Counsel

cc: Service list

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<sup>1</sup> / Petition at p. 3.

<sup>2</sup> / *Id.*.

**IMO Petition United Telephone  
d/b/a CenturyLink for Relocation  
of Flemington Office**

**BPU Docket No. \_\_\_\_\_**

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