

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

Application of Consolidated Communications Enterprise Services, Inc. d/b/a Consolidated Communications For Certification As An Interconnected VOIP Provider for Direct Access to Numbering Resources Pursuant To Section 52.15(g)(3) of the Commission's Rules, 47 CFR §52.15(g)(3)

WC Docket No. 22-\_\_\_\_

**Application of Consolidated Communications Enterprise Services, Inc.**

Pursuant to Section 52.15(g)(3) of the Commission's rules, 47 CFR §52.15(g)(3), Consolidated Communications Enterprise Services, Inc. ("CCES") d/b/a Consolidated Communications files this application for certification as a provider of interconnected VoIP services for the purpose of gaining direct access to telephone numbering resources from the North American Numbering Plan Administrator. CCES provides the following information in support of this Application, as required under the Commission's rules, and respectfully requests that this Application be placed on Public Notice as complete and sufficient for filing.

**I. Contact Information**

**1. Applicant Name and Business Address:**

Consolidated Communications Enterprise Services, Inc.  
d/b/a Consolidated Communications  
2116 S. 17<sup>th</sup> St  
Mattoon, IL 61938

The applicant, CCES, is a wholly-owned subsidiary of Consolidated Communications, Inc. ("CCI"). Michael Shultz, whose declaration supports the application, is Vice President of Regulatory for both CCES and CCI, and his responsibilities include regulatory compliance for the applicant, CCES.<sup>1</sup>

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<sup>1</sup> See Certification of Michael Shultz (attached hereto), ¶ 1.

**2. Personnel Responsible for Compliance with Regulatory Requirements and Commission Rules:**

Kevin Kastor  
Senior Director – Government Affairs  
CONSOLIDATED COMMUNICATIONS  
350 S. Loop 336 W  
Conroe, Texas 77304  
[Kevin.Kastor@consolidated.com](mailto:Kevin.Kastor@consolidated.com)  
Phone: 936-788-7420

With a copy to:

Barbara Galardo  
Director – Government Affairs  
CONSOLIDATED COMMUNICATIONS  
5 Davis Farm Rd.  
Portland, ME 04103  
[Barbara.Galardo@consolidated.com](mailto:Barbara.Galardo@consolidated.com)  
Phone: 207-535-4126

**3. Personnel Responsible for E-911 Compliance:**

Jon Eon  
CONSOLIDATED COMMUNICATIONS  
5 Davis Farm Rd.  
Portland, ME 04103  
[Jon.Eon@consolidated.com](mailto:Jon.Eon@consolidated.com)  
Phone: 207-770-9848

**4. Personnel Responsible for Compliance with Law Enforcement:**

Garrett Van Osdell  
350 South Loop 336 West  
Conroe, TX 77304  
Phone: 936-521-0027

**II. Acknowledgements**

CCES hereby acknowledges that:

a. Authorization granted under this application is subject to compliance with applicable Commission numbering rules, numbering authority delegated to the states, and industry practices and guidelines regarding numbering as applicable to telecommunications carriers; and

b. CCES must file requests for numbers with the relevant state Commissions at least thirty (30) days prior to requesting numbering from the numbering administrators.<sup>2</sup>

### **III. Interconnected VoIP Service Readiness**

CCES seeks direct access to telephone numbering resources for the provision of interconnected Voice Over Internet Protocol (“i-VOIP”) in the contiguous 45 states, excluding Maine, Vermont, and New Hampshire. CCES previously acquired direct access for numbering resources in Maine, New Hampshire and Vermont on November 24, 2018.<sup>3</sup>

CCES is capable of providing service within sixty days of the numbering resource activation date in accordance with Section 52.15(g)(2) of the Commission’s rules<sup>4</sup> and has provided i-VoIP service in many states since 2015 through a cloud based i-VOIP service known as ProConnect Unified Communications to enterprise customers.<sup>5</sup> These services currently are offered out-of-footprint using a numbering partner. If this petition is granted, CCES will continue offering the services it offers today without the need for a numbering partner.<sup>6</sup>

CCES will continue to provide i-VoIP service the same way it does today under an agreement to use facilities owned by its local exchange carrier (“LEC”) affiliates. In areas where CCES does not have an LEC affiliate whose facilities it can use to provision i-VoIP service, it has entered into an interconnection or Local Transit agreement. CCES has such a confidential agreement today, for example, with Inteliquent covering geographic areas where the LEC is not a CCES affiliate.

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<sup>2</sup> *Id.* at ¶ 2.

<sup>3</sup> Public Notice, WC Docket No. 18-204, “Notice of Interconnected VoIP Numbering Authorization Granted,” DA 18-1191, 33 FCC Rcd 11265 (Wir. Comp. Bur. 2018). Effective January 1, 2019, the applicant, Enhanced Communications of Northern New England, Inc., merged into CCES.

<sup>4</sup> 47 CFR §52.15(g)(2).

<sup>5</sup> See Certification of Michael Shultz at ¶ 3.

<sup>6</sup> See Certification of Michael Shultz at ¶ 4.

#### IV. Certifications

a. CCES hereby certifies that it complies with its Federal Universal Service Fund (“USF”) contribution obligations under 47 C.F.R. Part 54. Subpart H; its Telecommunications Relay Services Fund (“TRSF”) contribution obligations under 47 C.F.R. § 64.604(c)(5)(iii); its NANP and LNP administration and contribution obligations under 47 C.F.R. §§ 52.17 and 52.32; its obligations to pay regulatory fees under 47 C.F.R. §1.1154; and its 911 obligations under 47 C.F.R. Part 9.

b. CCES certifies that it possesses the financial, managerial and technical expertise to provide reliable i-VOIP service. CCI is a publicly-traded company, and is required to make financial filings with the Securities and Exchange Commission (“SEC”). All SEC filings including audit financial statements can be found at [Consolidated Communications Holdings, Inc. - Financials & Filings - SEC Filings](#). CCI’s management team, who also are the management team for CCES, includes Chief Technology Officer Thomas White, Executive Vice President of Operations Gabe Waggoner, and Executive Vice President & Chief Financial Officer Fred Graffam, III. None of the aforementioned managers has been investigated by the Commission or any law enforcement or regulatory agency for failure to comply with any law, rule or order.<sup>7</sup> A full listing of CCI’s management team with biographies can be found at [Consolidated Communications Holdings, Inc. - Governance - Executive Management](#).

c. CCES certifies that no party to this application is subject to a denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862.<sup>8</sup>

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<sup>7</sup> See Certification of Michael Shultz at ¶ 7.

<sup>8</sup> See Certification of Michael Shultz at ¶ 8.

**V. Conclusion**

For the foregoing reasons, CCES respectfully requests that the Commission certify it as an interconnected VoIP provider, and authorize it to obtain numbering resources directly from NANPA, pursuant to Section 52.15(g)(3) of the Commission's rules, 47 C.F.R. §52.15(g)(3).

Respectfully submitted,

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*Counsel for Consolidated Communications*

**Attachment: Certification of Michael Shultz, December 14, 2022**

CERTIFICATION OF MICHAEL SHULTZ

I, MICHAEL SHULTZ, hereby certify as follows:

1. The applicant, Consolidated Communications Enterprise Services, Inc. ("CCES"), is a wholly-owned subsidiary of Consolidated Communications, Inc. ("CCI"). My title is Senior Vice President of Regulatory & Public Policy of CCI and its subsidiaries. As such, I have responsibility for meeting CCES' external reporting requirements to the Federal Communications Commission ("FCC"), to the Universal Service Administrative Company ("USAC"), and to each of the regulatory commissions in the states where CCES operates. My current business address is 4008 Gibsonia Rd. Gibsonia, PA 15044.
2. In my capacity as Senior Vice President of Regulatory & Public Policy, I acknowledge that, if the application is granted, CCES will be subject to compliance with applicable Commission numbering rules, numbering authority delegated to the states, and industry practices and guidelines regarding numbering as applicable to telecommunications carriers; and CCES must file requests for numbers with the relevant state commissions at least thirty days prior to requesting numbering from the numbering administrators.
3. CCES provides interconnected voice over Internet protocol ("i-VOIP") services through a cloud based i-VOIP service known as ProConnect Unified Communications to enterprise customers since 2015, using a numbering partner.
4. If the application of CCES for certification as a VOIP provider is granted, CCES will continue offering i-VOIP services without the need for a numbering partner. Numbers acquired pursuant to the certification sought by this application would be put into use within sixty days of the numbering resource activation date.
5. If the application is granted, CCES will continue to provide i-VOIP service the same way it does today, which is by using the facilities owned by its local exchange carrier ("LEC") affiliates through an intra-corporate arrangement. In areas where CCES does not have any affiliate whose facilities it can use to provision i-VOIP service, it has entered into an interconnection or local transit agreement with a third party capable of providing the necessary services. CCES has such a confidential transit agreement, for example, with Inteliquent across the lower 48 states.

6. CCES complies with its Universal Service Fund contribution obligations under 47 C.F.R. Part 54. Subpart H; its Telecommunications Relay Service contribution obligations under 47 C.F.R. § 64.604(c)(5)(iii); its NANP and LNP administration contribution obligations under 47 C.F.R. §§ 52.17 and 52.32; its obligations to pay regulatory fees under 47 C.F.R. §1.1154; and its 911 obligations under 47 C.F.R. Part 9.
7. CCES possesses the financial, managerial, and technical expertise to provide reliable interconnected VOIP service. Key management and technical personnel include, among others:
  - a. Thomas White, Chief Technology Officer
  - b. Gabe Waggoner, Executive Vice President Operations; and
  - c. Fred Graffam, III, Executive Vice President & Chief Financial Officer

None of these personnel are being or have been investigated by the Commission or any law enforcement or regulatory agency for failure to comply with any law, rule, or order.

8. No party to the application, as defined in Commission rule section 1.2001(b) is subject to a denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

The foregoing is true and complete to the best of my information, knowledge and belief, including information provided to me by persons employed by CCI who are knowledgeable about its operations.

Executed on December 14, 2022

  
(Signature)