

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

Application of Enhanced Communications of        )  
Northern New England, Inc. d/b/a Consolidated    )  
Long Distance For Certification As a VOIP        )        WC Docket No. 18-204  
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)        )

**AMENDED APPLICATION**

Pursuant to Section 52.15(g)(3) of the Commission's rules, 47 CFR §52.15(g)(3),

**Enhanced Communications of Northern New England, Inc. d/b/a Consolidated Long Distance** (“Consolidated Long Distance”), hereby amends its Application, filed April 24, 2018 and supplemented August 27, 2018, in the above-captioned docket, 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. Consolidated Long Distance provides certain additional information in support of its application, and amends the application to incorporate in this filing all information required under the Commission’s rules. The company therefore respectfully requests that this Amended Application be placed on FCC Public Notice as complete and sufficient for filing.

**I.        Contact Information**

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

Enhanced Communications of Northern New England, Inc.  
d/b/a Consolidated Long Distance  
5 Davis Farm Rd.  
Portland, ME 04103

The applicant Consolidated Long Distance is wholly-owned by Consolidated of Northern New England, Inc. (“CNNE”), which in turn is wholly-owned by Consolidated

Communications, Inc. (“CCI”). Michael Shultz, whose declaration supports the application, is vice president of regulatory for both CNNE and CCI, and his responsibilities include regulatory compliance for the applicant, Consolidated Long Distance.<sup>1</sup>

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

Michael T. Skrivan  
5 Davis Farm Rd.  
Portland, ME 04103  
207.535.4150

**With a copy to:**

Ann Morrison  
5 Davis Farm Rd.  
Portland, ME 04103  
207.

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

Jon Eon  
5 Davis Farm Rd.  
Portland, ME 04103  
207.797.1303

**With a copy to:**

Barbara Galardo  
45 Forrest Ave.  
Portland, ME 04101  
207.535.4126

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

Garrett Van Osdell  
350 South Loop 336 West  
Conroe, TX 77304

**II. Acknowledgements**

Consolidated Long Distance hereby acknowledges that:

---

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

- 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. Consolidated Long Distance must file requests for numbers with the relevant state Commissions in Maine, New Hampshire and Vermont at least thirty (30) days prior to requesting numbering from the numbering administrators.<sup>2</sup>

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

Consolidated Long Distance seeks direct access to telephone numbering resources for the provision of interconnected Voice Over Internet Protocol (“i-VoIP”) in Maine, New Hampshire and Vermont. Consolidated Long Distance 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>3</sup> because Consolidated Long Distance is providing i-VoIP service in those states today. Consolidated Long Distance has been providing i-VoIP service in Maine, New Hampshire and Vermont for more than four years.<sup>4</sup> Consolidated Long Distance currently offers business i-VoIP services including hosted PBX and SIP Trunking.<sup>5</sup> These services currently are offered using a numbering partner. If this petition is granted, Consolidated Long Distance will continue offering the services it offers today without the need for a numbering partner.<sup>6</sup>

---

<sup>2</sup> *Id.* ¶2.

<sup>3</sup> 47 CFR §52.15(g)(2).

<sup>4</sup> See Certification of Michael Shultz, ¶3.

<sup>5</sup> *Id.*

<sup>6</sup> Certification of Michael Shultz ¶4. Other CCI subsidiaries currently provide interconnected VoIP service in these states: California, Iowa, Illinois, Kansas, Minnesota, Missouri, North Dakota, Pennsylvania, South Dakota, Texas and Wisconsin. *Id.* ¶6.

Consolidated Long Distance will continue to provide i-VoIP service the same way it does today: using the facilities owned by its local exchange carrier (“LEC”) affiliates, such as Northern New England Telephone Operations LLC (serving Maine and New Hampshire) and Telephone Operating Company of Vermont LLC (serving Vermont), through an intra-corporate arrangement, and entering into an interconnection agreement in any local area where the applicant does not have a LEC affiliate whose facilities it can use to provision interconnected VoIP service. Consolidated Long Distance has such an interconnection agreement today, for example, with TDS in New Hampshire (for portions of the state where the LEC is not a Consolidated Long Distance affiliate).<sup>7</sup> A copy of that agreement, which is publicly available, is provided herewith.

Consolidated Long Distance thus 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>8</sup>

#### **IV. Certifications**

a. Consolidated Long Distance hereby certifies that it contributes to the Federal Universal Service Fund (“USF”) and Telecommunications Relay Services Fund (“TRSF”) and complies with its contribution obligations with respect to those funds. Additionally, Consolidated Long Distance certifies that it complies with all contribution and administration obligations

---

<sup>7</sup> *Id.* ¶5. The applicant, Enhanced Communications of Northern New England, Inc., which is party to the referenced agreement with TDS, is also referred to in that agreement as “FAIRPOINT” because Enhanced Communications of Northern New England, Inc. was a wholly-owned subsidiary of FairPoint Communications, Inc. at the time of the agreement (August 2015); the latter merged with and into CCI in July 2017. *See Joint Application of Consolidated Communications Holdings, Inc., and FairPoint Communications, Inc., to Transfer Indirect Control of Authorization Holders to Consolidated Communications Holdings, Inc.*, WC Docket No. 16-417, Memorandum Opinion and Order, DA 17-432 (rel. May 8, 2017).

<sup>8</sup> Certification of Michael Shultz, ¶4.

under Sections 52.17 and 52.32 of the Commission's rules for NANP and LNP,<sup>9</sup> and all of its obligations to pay regulatory fees under Section 1.1154 of the Commission's rules,<sup>10</sup> and its 911 obligations under Part 9 of the Commission's rules.<sup>11</sup>

b. Consolidated Long Distance certifies that it possesses the financial, managerial and technical expertise to provide reliable i-VOIP service. As indicated above, Consolidated Long Distance currently provides these services and has been delivering high-quality i-VoIP services to Northern New England for 4 years. In addition, Consolidated Long Distance's affiliates have been providing VoIP service for over 17 years and now currently provide service in 24 states.<sup>12</sup> 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 <http://ir.consolidated.com/sec.cfm>. CCI's management team, who also are the management team for Consolidate Long Distance, includes Chief Technology Officer Thomas White, Executive Vice President of Operations Gabe Waggnor, and Chief Financial Officer Steven L. Childers. 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>13</sup> A full listing of CCI's management team with biographies can be found at <http://ir.consolidated.com/management.cfm>.

---

<sup>9</sup> 47 CFR §§52.17 & 52.32.

<sup>10</sup> 47 C.F.R. §1.1154.

<sup>11</sup> 47 C.F.R. §9.1 *et seq.* See Certification of Michael Shultz, ¶7.

<sup>12</sup> See Certification of Michael Shultz, ¶6.

<sup>13</sup> See Certification of Michael Shultz, ¶8.

c. Consolidated Long Distance 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>14</sup>

V. **Conclusion**

For the foregoing reasons, Consolidated Long Distance 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 ,



Karen Brinkmann  
Karen Brinkmann PLLC  
1800 M Street, NW  
Suite 800-North  
Washington, DC 20036  
(202) 365-0325

*Counsel to Consolidated Long Distance*

October 15, 2018

Attachments: Certification of Michael Shultz  
Interconnection Agreement (New Hampshire)

---

<sup>14</sup> See Certification of Michael Shultz, ¶9.