

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2019, covering calendar year 2018.

1. Date filed: February 27, 2019
2. Names of companies covered by this certification: See Attachment B (collectively, the "Company")
3. Form 499 Filer ID: See Attachment B
4. Name of signatory: Steven L Childers
5. Title of signatory: Chief Financial Officer for Consolidated Communications Holdings, Inc., the parent company of Consolidated Communications, Inc.
6. Certification:


I, Steven Childers, certify that I am an officer of the Company and acting as an agent of the Company, and that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement (see Attachment A) explaining how the Company's procedures ensure that the Company is in compliance with the CPNI requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken actions (*i.e.*, instituted any proceeding or filed any petition at a state commission, a court, or the Commission) against data brokers in the past year.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI. The Company had an issue occur when some customers received other customer's billing statement in CD format. See Attachment C.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: 
Steven L Childers
Chief Financial Officer
121 S 17th ST
Mattoon, IL 61938

Attachment A

**ACCOMPANYING STATEMENT OF
CONSOLIDATED COMMUNICATIONS HOLDINGS, INC.
REGARDING
COMPLIANCE WITH CPNI REGULATIONS FOR 2018
AT
47 C.F.R. § 64.2009(e)**

EB DOCKET 06-36

In order to comply with the FCC rules set forth at 47 C.F.R. Part 64, Subpart U, Consolidated Communications Holdings, Inc. and its subsidiaries, in Attachment B, (“Company”) has created a Company Policy document which fully acknowledges the Company’s commitment to protecting Customer Proprietary Network Information (“CPNI”) and which informs its employees and any agents acting on the Company’s behalf that they are required to follow the specific CPNI Guidelines outlined in the Company CPNI Policy. The Company CPNI Policy sets forth the specific policies and guidelines that are to be used by all employees in regard to the permitted use, disclosure and protection of CPNI. The Policy was developed and is maintained so as to be in compliance with 47 C.F.R. Part 64, Subpart U. A copy of the Company’s CPNI Policy is included in the employee handbook for all employees. The CPNI Policy is also maintained on the company internal intranet site. All customer contact employees and their supervisors are specifically trained to fully understand the CPNI Policy and consequences for noncompliance. CPNI customer rights and procedures are also explained in Consolidated Communication’s phone directories and in biannual mailings to customers.

Based on my personal review of the Company operating procedures related to the protection of CPNI, to the best of my knowledge and belief, the Company during the 2018 year has established operating procedures that are adequate to ensure compliance with the FCC Rules as set forth at 47 C.F.R. Part 64, Subpart U, regarding the protection of CPNI.

Attachment B

Consolidated Communications Affiliates

Consolidated Communications Holdings, Inc. is ultimate parent company of the Consolidated Communications (Consolidated) companies listed in this attachment:

Consolidated Communications of Fort Bend Company	801798	Consolidated Communications of Mid-Comm. Company	802143
Consolidated Communications of Texas Company	802425	Consolidated Communications of Pennsylvania Company	802458
Consolidated Communications of Minnesota Company	802521	Consolidated Communications of Illinois Company	803205
Consolidated Communications of California Company	804477	Consolidated Communications Enterprise Services, Inc.	822780
B.E. Mobile Communications, Inc.	814763	FairPoint Vermont, Inc.	809624
Bentleyville Communications Corporation	804795	The Germantown Independent Telephone Company	808407
Berkshire Cable Corp.	824726	Germantown Long Distance Company	816718
Berkshire Telephone Corporation	802959	GTC, Inc.	801855
Big Sandy Telecom, Inc.	801105	Maine Telephone Company	808391
Bluestem Telephone Company	811597	Marianna and Scenery Hill Telephone Company	801375
Chautauqua & Erie Communications, Inc.	803052	Marianna Tel, Inc.	816148
Chautauqua and Erie Telephone Corporation	803055	Northland Telephone Company of Maine, Inc.	809625
China Telephone Company	808137	Northern New England Telephone Operations LLC	827121
Chouteau Telephone Company	803622	Odin Telephone Exchange, Inc.	808311
Columbine Telecom Company	804097	Orwell Communications, Inc.	820810
The Columbus Grove Telephone Company	809796	The Orwell Telephone Company	808314
Comerco, Inc.	822806	Peoples Mutual Long Distance Company*	821666
Community Service Telephone Co.	808158	Peoples Mutual Telephone Company*	802170
C-R Long Distance, Inc.	801346	Quality One Technologies, Inc.	820151
C-R Telephone Company	801345	Sidney Telephone Company	808390
El Paso Long Distance Company	808573	ST Long Distance, Inc.	804428
The El Paso Telephone Company	808572	St. Joe Communications, Inc.	808392
Ellensburg Telephone Company	801162	Standish Telephone Company	808389
Elltel Long Distance Corp.	819056	Sunflower Telephone Company, Inc.	804429
Enhanced Communications of Northern New England Inc.	827123	Taconic TelCom Corp.	808681
ExOp of Missouri, Inc.	821082	Taconic Telephone Corp.	808680
FairPoint Business Services LLC	829941	Telephone Operating Company of Vermont LLC	827122
FairPoint Carrier Services, Inc.	817480	UI Long Distance, Inc.	822930
FairPoint Communications Missouri, Inc.	826139	YCOM Networks, Inc.	803502

*On July 31, 2018, Consolidated Communications completed the sale of Peoples Mutual Telephone Company and Peoples Mutual Long Distance Company, to RiverStreet Networks, a subsidiary of Wilkes Communications. Consolidated Communications continued to provide customer service and billing until 2/1/19, therefore certification for these companies are included within.

ATTACHMENT C

On February 3, 2018, an issue occurred when approximately 6 commercial Northern New England Telephone Operations customers received the February billing statement for other commercial customers. The bill statements had been scanned and sent in CD format. This mix-up was confirmed to be isolated to one bill cycle, with a bill dispatch method of "CD". The third-party billing vendor indicated that this process was manual and could not give a clear explanation for the mix-up of three packages. The impacted customers were notified of the situation and the correct data was provided to them; and the incorrect data was destroyed. Consolidated Communications has changed vendors to avoid a reoccurrence of this situation.