Consolidated

February 22, 2010

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, D.C. 20554

RE: EB Docket No. 06-36
Annual CPNI Certification

Dear Ms. Dortch:

In accordance with FCC Enforcement Advisory DA 10-91, issued on January 15, 2010, attached is the annual CPNI certification filing covering the year of 2009, pursuant to 47 C.F.R § 64.2009(e), for Consolidated Long Distance.

This is a complete replacement of the electronic filing for Consolidated Long Distance submitted on February 4, 2010.

Sincerely,

Wendy Thompson Fast

Wendy Thompson Fast
President

Attachment

cc: Best Copy and Printing, Inc.
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Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010 covering the prior calendar year 2009

1. Date filed: February 22, 2010

2. Name of company(s) covered by this certification: Consolidated Long Distance

3. Form 499 Filer ID: 825360

4. Name of signatory: Wendy Thompson Fast

5. Title of signatory: Vice President

6. Certification:

I, Wendy Thompson Fast, certify that I am an officer of the company named above, and acting as an agent of the company, 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 explaining how the company's procedures ensure that the company is in compliance with the 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.,* proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

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 Wendy Thompson Fast

Attachments: Accompanying Statement explaining CPNI procedures

OPERATING PROCEDURES FOR COMPLIANCE WITH CPNI RULES

Consolidated Long Distance (the "Company") has implemented the following procedures to ensure that it is compliant with Part 64 of Title 47 of the Code of Federal Regulations, Subpart U – Customer Proprietary Network Information (CPNI), § 64.2001 through § 64.2011.

CPNI Manual

The Company has adopted a CPNI Manual that governs the use of CPNI by all Company employees, agents and independent contractors.

Compliance Officer

The Company has appointed a CPNI Compliance Officer. The Compliance Officer is responsible for ensuring that the Company is in compliance with all of the CPNI rules. The Compliance Officer is also the point of contact for anyone (internally or externally) with questions about CPNI.

Employee Training:

Employees are required to read the Company's CPNI Manual and attend a training session during which the Manual will be reviewed and discussed. The Compliance Officer arranges for the training on an annual basis, and more frequently as needed. Any new employee is trained when hired by the Company. The training includes, but is not limited to, when employees are and are not authorized to use CPNI, and the authentication methods the company is using. The training detail can differ based on whether or not the employee has access to CPNI.

All employees are required to sign a CPNI Policy Acknowledgement. This Acknowledgement specifies that the employee has received a copy of the CPNI Manual, is responsible for reviewing and understanding the Manual and understands any violation of the Company's procedures will result in disciplinary action up to and including dismissal.

Employees are instructed that if they ever have any questions regarding the use of CPNI, if they are aware of CPNI being used improperly by anyone or if they encounter someone other than the authorized person on an account trying to access CPNI, they should contact the Compliance Officer immediately.

Disciplinary Process

The Company has established a specific disciplinary process for improper use of CPNI. The disciplinary action is based on the type and severity of the violation and could include any of the following: counseling, retraining, reassignment, suspension or termination.

The disciplinary process is reviewed with all employees.

A copy of the Company's disciplinary process is kept in the CPNI manual.

Customer Notification and Request for Approval to Use CPNI

The Company has provided notification to its customers of their CPNI rights and has asked for the customers' approval to use CPNI via the opt-out method. A copy of the notification is also provided to all new customers that sign up for service.

The status of a customer's CPNI approval is prominently displayed as soon as the customer's account is accessed. Employees can thus readily identify customers that have restricted the use of their CPNI.

For the customers that have opted-out and said the Company cannot use their CPNI, that decision will remain valid until the customer changes it.

The company sends the opt-out notice every two years to those customers that have not previously opted out.

The Company will provide written notice within five business days to the FCC of any instance when the opt-out mechanisms did not work properly to such a degree that consumers' inability to opt-out is more than an anomaly.

A copy of the most recent notification is kept in the CPNI manual.

Marketing Campaigns

The Compliance Officer will review all marketing campaigns to ensure that materials are in compliance with the CPNI rules. The campaign must be approved by the Compliance Officer.

The Company has a process for maintaining a record of any marketing campaign of its own, or its affiliates, which uses customers' CPNI.

Authentication

The Company does not disclose any CPNI until the customer has been appropriately authenticated as follows:

In-office visit - the customer must provide a valid photo ID matching the customer's account information.

Customer-initiated call – the customer is authenticated by providing an answer to a pre-established question and must be listed as a contact on the account.

If the customer wants to discuss call detail information that requires a password, the following guidelines are followed:

- If the customer can provide all of the call detail information (telephone number called, date of the call, location called, and the amount of the call) necessary to address the customer's issue, the Company will continue with its routine customer care procedures.

- If the customer cannot provide all of the call detail information to address the customer's issue, the Company will: (1) call the customer back at the telephone number of record, (2) send the information to the address of record, or (3) ask the customer to come into the office and provide a valid photo ID.

Notification of Account Changes

The Company promptly notifies customers whenever a change is made to any of the following:

- Address of record.

The notification to the customer will be made by mailing a letter to the address of record.

The Company has a process for tracking when a notification is required and for recording when and how the notification is made. An Access Database generates the notification letter.

Notification of Breaches

Employees will immediately notify the Compliance Officer of any indication of a breach. If it is determined that a breach has occurred, the Compliance Officer will do the following:

- Notify the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) as soon as practicable, but in no event later than seven business days after determination of the breach. The notification will be via the FCC link at http://www.fcc.gov/eb/cpni.
- Notify customers only after seven full business days have passed since notification to the USSS and the FBI, unless the USSS or FBI has requested an extension.
- Notify affected customers or the public prior to seven days after the breach if there is an urgent need to avoid immediate and irreparable harm. Such notifications will be done only after consultation with the relevant investigating agency.
- Maintain a record of the breach, the notifications made to the USSS and FBI, and the notifications made to customers. The record should include dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach.
- Include a summary of the breach in the annual compliance certificate filed with the FCC.

Annual Certification

The Compliance Officer will file a Compliance Certification with the FCC by March 1 of each year, for data pertaining to the previous calendar year.

Record Retention

The Company retains all information regarding CPNI. The minimum retention period for each type of record is as follows:

- CPNI notification and records of approval – one year
- Marketing campaigns – one year
- Breaches – two years
- Annual certification – seven years
- Employee training certification – two years
- All other information – two years

Miscellaneous

The Company CPNI policies include reasonable measures to discover and protect against activity that is indicative of pretexting as well as any other unauthorized attempts to access CPNI. Employees are instructed to notify the CPNI Compliance Officer immediately of any suspicious activity. The Compliance Officer will determine what action needs to be taken.