

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

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
High-Cost Universal Service Support)	WC Docket No. 05-337

**COMMENTS OF CONSOLIDATED COMMUNICATIONS ON
CAF PHASE I PUBLIC NOTICE**

Consolidated Communications Holdings, Inc. (“Consolidated”) respectfully submits the following comments in response to the *CAF Phase I Public Notice* issued in the above-captioned dockets on February 6, 2012.¹ In the *CAF Phase I Public Notice*, the Wireline Competition Bureau (“Bureau”) seeks comments on potential data that can be used as inputs to the equation that will be used to implement Connect America Fund Phase I (“CAF Phase I”) incremental support and on a list of wire centers for price cap carriers that would be eligible to receive CAF Phase I incremental support.

I. INTRODUCTION

Consolidated, founded in 1894, and headquartered in Mattoon, Illinois, is a family of companies² providing advanced communications services to both residential and business customers in Illinois, Texas and Pennsylvania. Consolidated’s ILEC subsidiaries serve a single study area in Illinois; two study areas in Texas; and a single study area in Pennsylvania. Consoli-

¹ *Connect America Fund, High-Cost Universal Service Support*, WC Docket Nos. 10-90, 05-337, Wireline Competition Bureau Seeks Comment on Potential Data for Connect America Fund Phase One Incremental Support, DA 12-137 (rel. Feb. 6, 2012) (“*CAF Phase I Public Notice*”).

² Consolidated’s local exchange operating companies are Illinois Consolidated Telephone Company, Consolidated Communications of Texas Company, Consolidated Communications of Fort Bend Company, and Consolidated Communications of Pennsylvania Company. Consolidated also has other non-ILEC operating subsidiaries.

dated's Illinois and Texas study areas are currently subject to price cap regulation.³ Consolidated's Pennsylvania study area is classified as an average schedule company, but since the majority of the holding company's lines are in the price cap study areas, the Pennsylvania ILEC is eligible for CAF Phase I incremental support pursuant to 47 CFR § 54.312(b).

II. OMITTED WIRE CENTERS

In the *USF/ICC Transformation Order* and Further Notice of Proposed Rulemaking, the Commission instituted CAF Phase I incremental support for price cap carriers and for rate-of-return carriers affiliated with price cap carriers.⁴ The Bureau subsequently developed a preliminary list of wire centers for price cap carriers and in its *CAF Phase I Public Notice* seeks comments to identify any errors or omissions in the proposed list.⁵ Consolidated has identified eleven eligible wire centers that were not included in the proposed list and respectfully requests that the Bureau add the wire centers itemized below to the list of those eligible.

Holding Company / Common Control	SAC	OCN	ST	WC
Consolidated Communications, Inc.	170193	0193	PA	CPSTPAXC
Consolidated Communications, Inc.	170193	0193	PA	CRCRPAXC
Consolidated Communications, Inc.	170193	0193	PA	CUVLPAXC
Consolidated Communications, Inc.	170193	0193	PA	FRPTPAXF
Consolidated Communications, Inc.	170193	0193	PA	GIBSPAXG
Consolidated Communications, Inc.	170193	0193	PA	MARSPAXM
Consolidated Communications, Inc.	170193	0193	PA	SXBGPAXS
Consolidated Communications, Inc.	170193	0193	PA	WXFRPAXW
Consolidated Communications, Inc.	341037	1037	IL	CHTNILXC
Consolidated Communications, Inc.	442109	2109	TX	CONRTXXA
Consolidated Communications, Inc.	442109	2109	TX	LFKNTXXA

³ See *Consolidated Communications Petition for Conversion to Price Cap Regulation and for Limited Waiver Relief*, WC Docket No. 07-291, DA 08-1026 (rel. May 6, 2008).

⁴ *Connect America Fund*, WC Docket No. 10-90, *et al.*, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, para. 129 (rel. Nov. 18, 2011).

⁵ *CAF Phase I Public Notice*, para. 5 (noting that the proposed list is available at http://hraunfoss.fcc.gov/edocs_public/attachmatch/DA-12-137A2.xls).

In response to the Bureau's request that commenters providing corrected data also provide "an explanation of where those data were obtained, or explaining how we could obtain correct data,"⁶ Consolidated states that it verified this list by consulting the NECA Tariff No. 4 database.

The Bureau also requested "comment on the data submitted by Windstream."⁷ Consolidated is unable to provide any such comment, due to the fact that this data is asserted to be subject to the terms of the Protective Order in this docket.⁸ Under those terms, only outside counsel and consultants are permitted to review the data. Consolidated's outside counsel do not have sufficient knowledge of the characteristics of individual wire centers within Consolidated's service area to comment meaningfully on this data without consulting with Consolidated's in-house subject matter experts, which they are prohibited from doing because any substantive consultation would have to include discussion of the protected data.

Respectfully submitted,

/electronically signed/

Michael Shultz
Vice President, Regulatory and Public Policy
Consolidated Communications Holdings, Inc.
350 S. Loop 336 W.
Conroe, TX 77304
Telephone: (936) 788-7414

Russell M. Blau
Denise S. Wood
Bingham McCutchen LLP
2020 K Street, N.W.
Washington, D.C. 20006
Telephone: (202) 373-6000
Facsimile: (202) 373-6001

Counsel for Consolidated Communications
Holdings, Inc.

Dated: March 12, 2012

⁶ *CAF Phase I Public Notice*, para. 5.

⁷ *CAF Phase I Public Notice*, para. 4.

⁸ *Connect America Fund*, WC Docket No. 10-90, *et al.*, Protective Order, 25 FCC Rcd 13160 (2010).