

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Commission, on its own motion, seeking to investigate and revise wireless tower testing standards and procedures pursuant to the Enhanced Wireless Services Act, Neb. Rev. Stat. §86-442 et seq.) Application No. 911-055 / PI-182))) **COMMENTS OF UNITED STATES CELLULAR CORPORATION**))

Unites States Cellular Corporation (“U.S. Cellular) hereby files these comments for the Nebraska Public Service Commission’s (“Commission”) consideration in Application No. 911-055 / PI-182. U.S. Cellular appreciates the Commission opening this docket to review its current testing procedures and seeking input from interested parties. While brief, U.S. Cellular’s believes its comments set forth below will improve the efficiency and operation of the testing process in Nebraska.

SHORTEN THE ADVANCE NOTIFICATION PERIOD TO FIVE (5) DAYS

Presently, the required advance notification period is two weeks. U.S. Cellular respectfully suggests that period of time can be shortened to five (5) days without adversely impacting the process or the testing procedures. When a new tower has reached completion, customers are eagerly awaiting the better service and coverage it will provide. As such, U.S. Cellular asks the advance notification period be shortened so the tower can be ‘on air’ as soon as reasonably possible. U.S. Cellular believes a five (5) day advance notification period is reasonable and will not impair the testing process or procedures in any way.

REMOVE ROAMER TESTING REQUIREMENTS FROM THE TEST PLAN

Currently, the testing process requires wireless providers to conduct a roamer or traveler test. U.S. Cellular encourages the Commission to examine this requirement and delete it as an obligation because it is redundant and duplicative of another test being conducted. The roamer test uses the exact same translations as the Active phone test, therefore making it redundant and unnecessary. Carriers of course want to ensure their towers are functioning optimally, but they also strive to be cost-effective and efficient in doing so. Accordingly, U.S. Cellular respectfully asks the Commission to remove the requirement to conduct roamer / traveler testing insofar as the results of such test are already ascertained through other testing obligations.

In closing, U.S. Cellular thanks the Commission for the opportunity to submit these comments and for examining whether changes can improve the wireless tower testing process in Nebraska. It is with appreciation, U.S. Cellular files these comments as it believes the testing process can indeed be improved for both consumers and carriers alike.

Respectfully submitted this 30th day of November.

Attorney for United States Cellular Corporation

Deonne Bruning, #20127
Deonne Bruning, P.C., L.L.O.
2901 Bonacum Drive
Lincoln, NE 68502
(402) 421-6405