

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Nebraska) Application No. NUSF-108
Public Service Commission, on its)
own Motion, to make adjustments)
to its high-cost distribution)
mechanism and to make revisions)
to its reporting requirements.)

REPLY COMMENTS OF THE RURAL INDEPENDENT COMPANIES

The Nebraska Rural Independent Companies (“RIC”)¹ submit these Reply Comments in response to the Commission’s Order Opening Docket and Seeking Comment entered in this proceeding on September 27, 2016 (the “Order”) and the comments filed by other interested parties in this proceeding. RIC appreciates the opportunity to provide the following Comments to the Commission.

RIC has reviewed the Comments filed by the price cap carriers, Citizens Telecommunications Company of Nebraska, Qwest Corporation d/b/a CenturyLink QC and United Telephone Company of the West d/b/a CenturyLink, and Windstream Nebraska, Inc. (the “PC Carriers”). By and large, the PC Carriers’ filed Comments reflect positions uniquely applicable to price cap carriers distinct from the interests of rate-of-return (“RoR”) carriers. Of course, all of the RIC member companies are RoR carriers. Thus, with the exception of the positions in the following paragraph, RIC has determined that it will not provide reply comments

¹ Arlington Telephone Company, Blair Telephone Company, Cambridge Telephone Co., Clarks Telecommunications Co., Consolidated Telephone Company, Consolidated Telco, Inc., Consolidated Telecom, Inc., The Curtis Telephone Company, Eastern Nebraska Telephone Company, Great Plains Communications, Inc., Hamilton Telephone Company, Hartington Telecommunications Co., Inc., Hershey Cooperative Telephone Company, Inc., K & M Telephone Company, Inc., The Nebraska Central Telephone Company, Northeast Nebraska Telephone Company, Rock County Telephone Company, Stanton Telephone Co., Inc. and Three River Telco.

in response to the *Order* and the comments filed by other interested parties, but rather, will stand on its Comments filed herein on October 27, 2016.

RIC joins in the position set forth in the Comments of the Rural Telecommunications Coalition of Nebraska urging that separate consideration be given by the Commission to any modification in the NUSF High-Cost Program, support distribution methodology and reporting requirements that may be proposed for application to RoR carriers. Any final resolution of the issues presented in this Application NUSF-108 should not be precedential to the Commission's future consideration of any modifications to the application of the NUSF High-Cost Program to RoR carriers. RIC looks forward to participation in any future dockets or proceedings that may address the application of the NUSF High-Cost Program to RoR carriers.



Dated: November 14, 2016.

Arlington Telephone Company, Blair Telephone Company, Cambridge Telephone Co., Clarks Telecommunications Co., Consolidated Telephone Company, Consolidated Telco, Inc., Consolidated Telecom, Inc., The Curtis Telephone Company, Eastern Nebraska Telephone Company, Great Plains Communications, Inc., Hartington Telecommunications Co., Inc., Hershey Cooperative Telephone Company, Inc., K & M Telephone Company, Inc., The Nebraska Central Telephone Company, Northeast Nebraska Telephone Company, Rock County Telephone Company, Stanton Telephone Co., Inc., and Three River Telco (the "Rural Independent Companies")

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 14th day of November, 2016, an electronic copy of the foregoing pleading was delivered to:

Nebraska Public Service Commission

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All Parties Filing Comments in this Docket

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