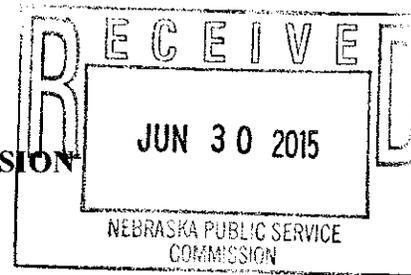


**BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION**



In the Matter of the Nebraska Public Service )  
Commission, on its Own Motion, to Administer ) Application No. NUSF-99  
the Universal Service Fund High-Cost Program )

**COMMENTS OF NE COLORADO CELLULAR, INC. D/B/A VIAERO WIRELESS  
PURSUANT TO COMMISSION ORDER SEEKING FURTHER COMMENT AND  
SETTING HEARING**

NE Colorado Cellular, Inc. d/b/a Viaero Wireless ("Viaero") is pleased to submit the following comments in response to the Commission's Order Seeking Further Comment and Setting Hearing entered June 16, 2015 in this Docket ("Order").

Viaero generally supports the Commission's initiative to adopt a new dedicated NUSF distribution mechanism for price cap carriers designed to "target and track" NUSF investment in broadband infrastructure by price cap carriers. In particular, Viaero applauds the Commission's commitment to the creation of policies that "incent" carriers to make appropriate investment decisions in Nebraska and to expand broadband access where it is needed. Viaero concurs with the Comments of Sprint and other carriers in supporting the Commission's intention to prohibit NUSF support in areas that already have an unsubsidized carrier providing comparable broadband service.

Viaero also agrees with the Comments of other carriers that NUSF support should be restricted or eliminated for any area where CAF II funding is available but the price cap carrier declines to pursue it. Viaero submits that this policy would in fact be consistent with the goals of the NUSF Act, which specifically authorizes the Commission to establish a funding mechanism which "supplements" federal USF support mechanisms. Clearly, this specific authority

recognizes that carriers must first access available federal support and then pursue state support only if federal support is not sufficient. This policy would advance the Commission's goals of targeting precious NUSF support to those areas not eligible for "FCC model - based CAF funding" to ensure that continued general availability of voice services, and likely broadband services, would be provided in those areas. As a corollary, Viaero opposes any proposal that would permit a price cap carrier to receive any fixed percentage of its "frozen" 2015 NUSF support in the absence of a requirement to determine whether CAF support is available in the areas for which NUSF funding is requested and that the price cap carrier has pursued receipt of such funding.

Viaero also recognizes and applauds the Commission's initiatives to develop a new NUSF cost model that recognizes the advances and efficiencies in technology for both voice and broadband services since the historic, and now antiquated, cost models were adopted in the late 90's. Given the scarce NUSF funding available for distribution, claims by price cap carriers that CAF support will be inadequate for price cap carriers to deploy broadband service to "all Nebraskans in price cap service areas" reflect a disregard of the policy directives at both the state and federal level for the need for efficient and low cost services to be deployed in high cost and rural areas in order to conserve precious financial support.

Historically, the vast majority of high cost funds have been dedicated to legacy voice networks and, more recently, the development of broadband. Only a very small percentage of high cost funding has been directed to newer, more efficient technologies, including wireless technologies, which have provided a more cost efficient and more rapid deployment of new technologies in rural and high cost areas. With the development of targeted NUSF reforms, which will align the Commission's historic NUSF mechanism with ongoing federal reforms, the

Commission's use of precious NUSF funding resources will be directed to the most efficient and cost effective technologies, thereby maximizing the benefits of technological advancements to all Nebraska consumers. These reforms will reward efficient technological solutions rather than subsidizing inefficient legacy systems, thus making available greater funding for technologically advanced solutions and providers. Viaero believes that these reforms will permit Viaero, and other technologically advanced providers, to utilize enhanced NUSF funding to more quickly and efficiently expand vital services to the remote locations in the State where federal support will not be available.

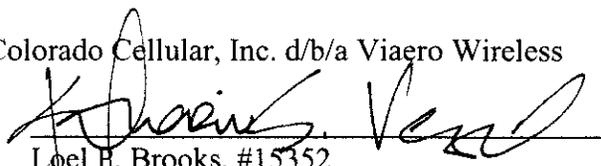
In conclusion, Viaero applauds the Commissions efforts to reform the NUSF system and align it with emerging federal programs. Certainly the NUSF Act provides the Commission with the authority and direction to do so. The proposals set forth in this Docket, if appropriately embedded with assurances that price cap carriers must first seek federal CAF funds where they are available, will target NUSF support to rural and high cost areas where it is needed, while incentivizing carriers to make appropriate investment decisions. The Commissions reforms will also better direct scarce NUSF support to more efficient and cost effective technologies and providers , thereby permitting more rapid and comprehensive expansion of voice and broadband services to areas of the state most in need.

Viaero is grateful for the opportunity to participate in this Docket.

Respectfully submitted this 30<sup>th</sup> day of June, 2015.

NE Colorado Cellular, Inc. d/b/a Viaero Wireless

By:



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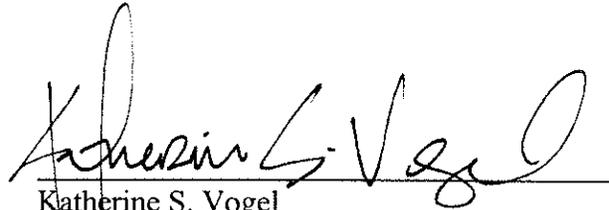
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 30<sup>th</sup> day of June, 2015, an original, one copy and an electronic copy of the Comments of Viaero in NUSF-99 were delivered to:

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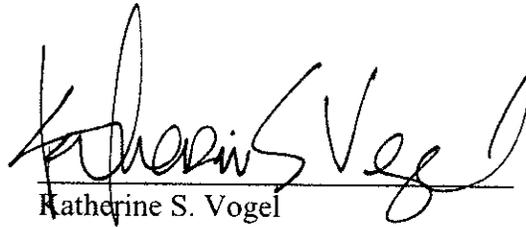
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