

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of Pinpoint) Application No.
Communications, Inc., seeking transition)
of ongoing high-cost Nebraska Universal) **VERIFIED APPLICATION**
Service Support for eligible served)
locations in Citizens Telecommunications)
Company of Nebraska territory.)

Pinpoint Communications, Inc. ("Applicant") files this application with the Public Service Commission ("Commission"), pursuant to the Commission's Rules of Procedure, seeking receipt of ongoing high-cost Nebraska Universal Service Fund ("NUSF") for locations for which Citizens Telecommunications Company of Nebraska, the incumbent local exchange carrier ("ILEC") has carrier of last resort ("COLR") responsibilities ("Transition Support Area," as further defined). Applicant is currently offering fiber-based voice and broadband services to all locations in the Transition Support Area. As the Application will set forth, the action sought is consistent with existing law, the Commission's NUSF Rules and Regulations, as well as orders entered in NUSF-139.

In support of its Application, Applicant provides the following:

1. A description of the Applicant's organizational structure (Exhibit A), including a certificate of good standing from the Nebraska Secretary of State (Exhibit B).
2. A demonstration that the Applicant is an Nebraska Eligible Telecommunications Carrier (Exhibit C).
3. A commitment verified by the Affidavit below to comply with all provisions of NEB. ADMIN. CODE, tit. 291, ch. 10, § 004.02(G).
4. A commitment verified by the Affidavit below to fulfill to the Commission's satisfaction the following COLR obligations for so long as the Applicant receives NUSF support:

- a. Offer Voice Services to all locations in the Transition Support Area in compliance with the Commission's rules and regulations.
 - b. Offer reliable Broadband Services to all locations in the Transition Support Area at speeds required by Nebraska statute.
 - c. Offer affordable and reasonably comparable Voice Services and Broadband Services to all locations in the Transition Support Area.
 - i. Rates for Voice Services will be no higher than the Voice Benchmark Rate established by the Commission.
 - ii. Rates for Broadband Services will comply with the Broadband Benchmark Rate established by the Commission.
 - d. Offer 911 and Telecommunications Relay services.
 - e. Participate in the Nebraska Telephone Assistant Program.
5. A description of the Transition Support Area, showing by shapefile all Serviceable Locations for which support is sought is attached to the electronic filing of this Application as Exhibit D. Exhibit D includes locations in town for which Applicant is not seeking high-cost support.
6. A commitment to file the NUSF EARN Form, or any replacement filing, annually.
7. A commitment to file Commission-prescribed NETC certification reports annually.
8. A commitment to provide interconnection with any requesting carrier on a reasonable and nondiscriminatory basis.
9. A commitment to filing speed test data and meeting speed testing metrics consistent with the Commission's Orders in NUSF-133.
10. A commitment that NUSF support received will be used in a manner consistent with the requirements of the NUSF Act (NEB. REV. STAT. 86-316 – 86-239),

Commission Rules and Regulations, and any order or policy of the Commission relevant to the use of NUSF support.

11. An affirmation verified by the Affidavit below that Applicant is not using or deploying communications equipment or service deemed to pose a threat to national security which is identified on the FCC's *List of Equipment and Services Covered by Section 2 of the Secure Networks Act* anywhere on its network.

12. Information responsive to the Commission's NUSF Rules and Regulations (NEB. ADMIN. CODE, tit. 291, ch. 10, § 004.02(G)(i)):

- a. **The cost of providing the supported services.** Applicant requests support for all Serviceable Locations in the Support Transition Area based on modelling approved by the Commission in NUSF-139.
- b. **An estimate of the amount of NUSF high-cost program support needed in the area.** Applicant defers to the modelling approved by the Commission in NUSF-139.
- c. **Benefits to consumers.** Consumers already have access to Applicant's fiber-based telecommunications and broadband services at locations where the ILEC was not offering comparable services.
- d. **The supported services provided in unserved areas.** Applicant will comply with its COLR obligations as stated above.
- e. **A demonstration that the quality of service provided would equal the existing service or be better than service provided.** Such information is publicly available as part of Broadband Data Collection ("BDC") program administered by Federal Communications Commission ("FCC").

- f. **Applicant will adopt existing interconnection agreements for the Transition Support Area as needed to provide services**, consistent with the requirements of NUSF-139.
- g. **Specific demonstration and documentation of the ability of the Applicant to offer service to everyone on its own network.** Such information is publicly available as part of the FCC's BDC program.

Having complied with all statutes, rules, regulations, and orders of the Commission, Applicant respectfully requests the Commission enter an Order:

- 1. Allocating ongoing high-cost support consistent with modelling under NUSF-139 to Applicant for all locations in the Transition Support Area that are eligible for such support;
- 2. Subjecting Applicant to the following COLR duties for so long as it receives NUSF ongoing support:
 - a. Offer Voice Services to all locations in the Transition Support Area in compliance with the Commission's rules and regulations.
 - b. Offer reliable Broadband Services to all locations in the Transition Support Area at speeds required by Nebraska statute.
 - c. Offer affordable and reasonably comparable Voice Services and Broadband Services to all locations in the Transition Support Area.
 - d. Rates for Voice Services will be no higher than the Voice Benchmark Rate established by the Commission.
 - e. Rates for Broadband Services will comply with the Broadband Benchmark Rate established by the Commission.
 - f. Offer 911 and Telecommunications Relay services.
 - g. Participate in the Nebraska Telephone Assistant Program.

3. Holding Applicant to the other commitments it has made in its Application.
4. Relieving ILEC of its COLR duties for all locations in the Transition Support Area.

DATED: October 2, 2025

PINPOINT COMMUNICATIONS, INC.,
APPLICANT

By: REMBOLT LUDTKE LLP
3 Landmark Centre
1128 Lincoln Mall, Suite 300
Lincoln, NE 68508
(402) 475-5100

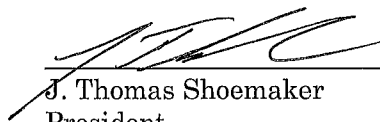
By: /s/ Andrew S. Pollock
Andrew S. Pollock (#19872)
apollock@remboltlawfirm.com

By: /s/ Jeffrey Owusu-Ansah
Jeffrey Owusu-Ansah (#28033)
jowusuansah@remboltlawfirm.com

VERIFICATION

STATE OF NEBRASKA)
) ss.
COUNTY OF Furnas)

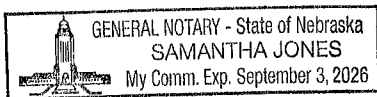
J. Thomas Shoemaker, being first duly sworn on oath, deposes and states that he has read the foregoing Verified Application and that the information set forth therein is true to the best of his knowledge and belief and verifies the commitments made in the Verified Application on behalf of the Applicant.



J. Thomas Shoemaker
President

SUBSCRIBED AND SWORN to before me by J. THOMAS SHOEMAKER on this ____ day of October 2025.

(SEAL)





Notary Public

Pinpoint Holdings Inc. is the parent company that provides strategic oversight, governance, and shared services for its operating subsidiaries. Pinpoint Holdings establishes the corporate vision, manages financial resources, ensures compliance, and coordinates enterprise-wide initiatives that support growth and long-term sustainability.

Pinpoint Communications Inc., is a wholly owned subsidiary of Pinpoint Holdings Inc. Pinpoint Communications is responsible for the delivery of advanced telecommunications services, including Fiber-to-the-Home (FTTH), business broadband solutions, and related customer support services. While Pinpoint Communications operates with autonomy in its day-to-day business functions, it aligns with the parent company's strategic priorities and leverages shared resources, capital support, and executive guidance provided by Pinpoint Holdings.

The relationship between the two entities is structured so that:

- **Pinpoint Holdings Inc.** serves as the owner and governing body, overseeing financial performance, compliance, and strategic direction.
- **Pinpoint Communications Inc.** serves as the operating company focused on execution, customer service, and market growth within the telecommunications sector.

This structure ensures that Pinpoint Communications has the operational flexibility to serve its customers effectively while benefiting from the stability, strategic alignment, and financial backing of Pinpoint Holdings Inc.

EXHIBIT A

Nebraska Public Service Commission

COMMISSIONERS:

ANNE C. BOYLE
LOWELL C. JOHNSON
ROD JOHNSON
FRANK E. LANDIS
GERALD L. VAP

EXECUTIVE DIRECTOR:

ANDY S. POLLOCK



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NEBRASKA CONSUMER HOTLINE:

1-800-526-0017

March 13, 2003

Dear Interested Parties:

CERTIFICATION

I, Andy S. Pollock, Executive Director of the Nebraska Public Service Commission, hereby certify that the enclosed is a true and correct copy of the original order made and entered in Application No. NUSF-31 on the 11th day of March, 2003, as the same is filed and recorded in the official records of said Commission.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the Seal of the Nebraska Public Service Commission, Lincoln, Nebraska, this 13th day of March, 2003.

Please acknowledge receipt of this document in writing.

Sincerely,

A handwritten signature in black ink that reads "Andy S. Pollock".

Andy S. Pollock
Executive Director

AP:jbz

Enclosure

**EXHIBIT
B**

SECRETARY'S RECORD, NEBRASKA PUBLIC SERVICE COMMISSION

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of Pinpoint)	Application No. NUSF-31
Communications, Inc., McCook,)	
seeking designation as a Nebraska)	
Eligible Telecommunications)	GRANTED
Carrier that may receive state)	
universal service support.)	
)	Entered: March 11, 2003

APPEARANCES:

For the Applicant:
Jon Bruning
7919 Rock Creek Circle
Omaha, Nebraska

For the Commission staff:
Shana Knutson
300 The Atrium
1200 N Street
Lincoln, Nebraska

BY THE COMMISSION:

By application filed October 31, 2002, Pinpoint Communications Inc., (Pinpoint or applicant) seeks designation as a Nebraska Eligible Telecommunications Carrier (NETC) so that it may qualify to receive state universal service support. Notice of the application was published in The Daily Record, Omaha, Nebraska, on November 5, 2002. No protests or requests for intervention were filed. A hearing on the application was held on January 6, 2003, with appearances as shown above.

The applicant presented one witness who testified as follows:

Mr. Roger Hoffman, Executive Vice President for Pinpoint, testified that Pinpoint has met all of the qualifications to become an NETC. Pinpoint provides voice grade access to the public switched network, unlimited local usage, dual tone multi-frequency signaling and/or its functional equivalent, single party service and/or its functional equivalent, access to emergency services including enhanced 911, operator services, equal access to interexchange service, white page listings for its customers, and toll limitation for qualifying low income consumers. Pinpoint advertises the availability of its service and charges for such services using media of general distribution. Mr. Hoffman further testified that Pinpoint will abide by all service quality standards and rules that have been and will be promulgated by the Commission. The witness further promised that Pinpoint would abide by all Commission rules regarding access charges that have or will be promulgated by the Commission.

SECRETARY'S RECORD, NEBRASKA PUBLIC SERVICE COMMISSION

Application No. NUSF-31

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With respect to the receipt of transitional support, Mr. Hoffman testified that Pinpoint may request transitional support depending on when the Commission is able to complete its work in Application NUSF-26. Mr. Hoffman stated that Pinpoint would like to seek support from the NUSF sometime after mid-year. If Pinpoint does seek transitional support it would return to the Commission with specific cost justification so that the Commission can make a determination of any transitional support sought by Pinpoint.

Upon questioning, Mr. Hoffman confirmed that Pinpoint participates in the Lifeline program. Pinpoint agreed to price its universal service offering consistent with any Commission prescribed benchmarks. Should the Commission add or modify the requirements for obtaining and keeping NETC status, Pinpoint agreed to demonstrate to the Commission that it has met or can meet those requirements.

O P I N I O N A N D F I N D I N G S

Upon consideration of the testimony and evidence filed in this proceeding, the Commission is of the opinion and finds that the application of Pinpoint should be granted. Pinpoint was given a Certificate of Public Convenience and Necessity by this Commission in Application No. C-2355, to operate as a competitive local exchange carrier of telecommunications services within the state of Nebraska. At that stage, Pinpoint demonstrated it possessed the adequate technical, managerial and financial ability to provide competitive local exchange service in areas served by Qwest Corporation, ALLTEL Communications, Citizens and United Telephone Company of the West. On April 23, 2002, this Commission designated Pinpoint as an Eligible Telecommunications Carrier (ETC) for the purpose of receiving federal universal service support in areas served by Qwest Corporation, ALLTEL Communications, Citizens and United Telephone Company of the West. Pinpoint has demonstrated that it has complied with current federal and state ETC and NETC rules and requirements in the areas described herein.

In our estimation, the proceedings in NUSF-26 will most likely change or alter the current support and eligibility requirements. Should the Commission alter its NETC rules and requirements, the Commission will require Pinpoint to come back to the Commission, along with all other previously designated eligible telecommunications carriers, to ensure that it is compliant with any new eligibility requirements and to re-certify its NETC status.

We further note that this Order does not constitute a grant of transitional support. Pinpoint has not yet demonstrated any specific costs or provided any other company specific information upon which the Commission can calculate support. Should Pinpoint

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wish to receive interim support, Pinpoint should file an application requesting a specific amount of support, demonstrating its costs and justifying its request for transitional support from the NUSF.

O R D E R

IT IS THEREFORE ORDERED by the Nebraska Public Service Commission that the application of Pinpoint Communications, Inc., be and it is hereby granted and Pinpoint Communications is designated as a Nebraska Eligible Telecommunications Carrier for the areas described herein.

IT IS FURTHER ORDERED that should Pinpoint Communications Inc. seek interim support, it be required to file an application containing a specific request and any cost justification for the calculation of such interim support.



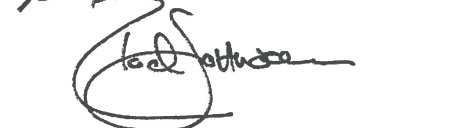
IT IS FURTHER ORDERED that should the requirements for NETC's be altered or modified by the decision reached by the Commission in Application NUSF-26, Pinpoint Communications, Inc. be required to apply for re-certification as an NETC and demonstrate that it meets any additional rules and requirements.

IT IS FURTHER ORDERED that this grant shall be subject to the terms, conditions, and limitations which have been, or may hereafter be, prescribed by the Commission.

MADE AND ENTERED at Lincoln, Nebraska, this 11th day of March, 2003.

NEBRASKA PUBLIC SERVICE COMMISSION

COMMISSIONERS CONCURRING:

//s//Anne C. Boyle
 //s//Frank E. Landis

Chair

ATTEST:


 Executive Director

SECRETARY'S RECORD, NEBRASKA PUBLIC SERVICE COMMISSION

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Application) Application No. C-2659
of Pinpoint Communications, Inc.)
of Cambridge, Nebraska, seeking) ORDER GRANTING DESIGNATION
designation as an eligible) AS AN ELIGIBLE
telecommunications carrier that) TELECOMMUNICATIONS CARRIER
may receive universal service)
support.) Entered: April 23, 2002

BY THE COMMISSION:

By application filed January 22, 2002, Pinpoint Communications, Inc. (Pinpoint or Applicant) of Cambridge, Nebraska, seeks designation as an eligible telecommunications carrier (ETC) so that it may receive universal service support. Notice of this application was published in The Daily Record, Omaha, Nebraska, on January 23, 2002. No formal protest or petition of formal intervention was filed; therefore, this application is processed pursuant to the Commission's Rule of Modified Procedure.

According to its original application, Pinpoint sought ETC status for the areas in which it has been certified as a local exchange carrier in Application No. C-2355. However, after discussion with Commission staff, the applicant amended its application to only seek federal ETC status in the areas currently served by Qwest Corporation, ALLTEL Communications, Citizens and United Telephone Company of the West. Accordingly, Pinpoint no longer seeks designation as an ETC in any service area served by a "rural telephone company" as such term is defined by the federal Telecommunications Act of 1996 (the Act).

Furthermore, Pinpoint also indicated that it was not, at this time, seeking designation as a Nebraska eligible telecommunications carrier (NETC) as it does not intend to apply for funding from the Nebraska Universal Service Fund (NUSF) until permanent NUSF rules are established. Therefore, Pinpoint will reapply to seek designation as a Nebraska eligible telecommunications carrier (NETC) when permanent funding rules are established.

O P I N I O N S A N D F I N D I N G S

Pinpoint was granted a certificate of public convenience and necessity to provide local exchange telecommunications services in Application No. C-2355 on September 19, 2000. Currently, Pinpoint provides local telecommunications services through resale. However, Pinpoint is installing its own switch

EXHIBIT
C

and will use UNEs sometime in the second or third quarter of 2002.

Pinpoint offers voice-grade access to the public switched network, local usage for both data and voice, dual tone multi-frequency signaling, single party service, access to emergency service, access to operator service, access to interexchange service, access to directory assistance and toll limitation for qualifying low-income consumers.

According to Roger Hoffman, Executive Vice President of Pinpoint Communications, Inc., Pinpoint does offer equal access, white page listings and service quality equivalent to the incumbent (Qwest). Furthermore, Pinpoint has provided documentation of its advertisements in a publication of general circulation, as well as other media. Finally, Pinpoint indicated that in its opinion certification of Pinpoint as an ETC would be consistent with the public interest, convenience and necessity.

Section 214(e) of the Act sets forth the standards and processes for a state commission to grant carriers the designation of eligible telecommunications carrier. The three general requirements listed in Section 214(e) are that: (1) the carrier must be a common carrier; (2) the carrier must offer the "services" that are supported by the federal fund; and (3) the carrier must advertise the availability of those services. In addition, the carrier must fulfill these criteria throughout the service area for which the designation is received.

The "services" supported by the federal fund as provided by 47 C.F.R. § 54.101(a) are as follows:

- a. Voice-grade access to the public switched telephone network;
- b. Local usage;
- c. Dual tone multi-frequency signaling or its functional equivalent;
- d. Single-party service or its functional equivalent;
- e. Access to emergency services;
- f. Access to operator services;
- g. Access to interexchange service;
- h. Access to directory assistance;
- i. Toll limitation for qualifying low-income consumers.

Pinpoint provided documentation that it fulfills the requirements of 47 C.F.R. § 54.101(a) and confirms that it provides all of the above-referenced services.

Pinpoint also provided adequate examples that it has been, and will be, advertising the availability of the supported services. Pinpoint agrees with the Commission that, in the event ETC status is granted, it will advertise its universal service offerings and the charges therefore using media of general distribution pursuant to federal and Commission requirements.

Applicant has demonstrated that it meets the standards set forth in 47 U.S.C. § 214(e) and applicable federal law for the designation of eligible telecommunications carriers in the proposed geographic area.

However, this granting of ETC designation does not trigger qualification for NUSF support. Prior to receiving any NUSF support, applicant must reapply to seek designation as a Nebraska eligible telecommunications carrier (NETC) when permanent funding rules are established.

Finally, the Commission has jurisdiction and authority to ensure that Pinpoint continues to meet the ETC criteria set forth in Section 214(e) of the Act. Nothing prevents the Commission from, on its own motion, modifying, suspending or revoking Pinpoint's ETC designation if it does not continue to meet those obligations.

O R D E R

IT IS THEREFORE ORDERED by the Nebraska Public Service Commission that the application of Pinpoint Communications, Inc., to be designated an Eligible Telecommunications Carrier shall be, and it is hereby, granted as amended.

IT IS FURTHER ORDERED that Pinpoint Communications, Inc., is hereby declared to be an Eligible Telecommunications Carrier for federal support in the areas served by Qwest Corporation, ALLTEL Communications, Citizens and United Telephone Company of the West.

IT IS FURTHER ORDERED that Pinpoint will need to reapply to seek designation as a Nebraska eligible telecommunications carrier (NETC) once permanent funding rules are established.

MADE AND ENTERED at Lincoln, Nebraska this 23rd day of April, 2002.

NEBRASKA PUBLIC SERVICE COMMISSION

COMMISSIONERS CONCURRING:

Chair

ATTEST:

Executive Director

Exhibit D

See attached Transition Support file