

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Nebraska Public)	Application No. NUSF-131
Service Commission, on its own motion,)	Progression Order No. 3
to establish reverse auction procedures)	
and requirements.)	
)	

INITIAL COMMENTS OF WINDSTREAM

Windstream Nebraska, Inc. (“Windstream”) hereby respectfully file these comments as permitted by the Order Seeking Comment and Notice of Hearing issued by the Nebraska Public Service Commission (“Commission”) on April 16, 2024, and the Order Revising Proposed Procedural Schedule and Clarifying Deadline issued by the Commission on April 30, 2024, and state as follows:

Windstream would like to take the opportunity to reiterate its appreciation for the Commission’s collaboration with industry as it works to improve the reverse auction and continues its efforts to improve the Nebraska Universal Service Fund (“NUSF”) process as the funding and technology for broadband deployment evolve.

Windstream cautions the Commission against efforts by rate of return carriers to exclude price cap carriers from participating in reverse auctions. As a price cap carrier, Windstream shares the Commission’s desire to increase access to high-speed broadband in Nebraska, including in the state’s most rural communities and homesteads. Windstream has demonstrated this commitment by investing over \$340 million in capital over the last ten years to expand its broadband infrastructure in Nebraska. In addition, Windstream has actively participated in the reverse auction process, as well as state and federal programs designed to improve access to broadband for Nebraska consumers by building new infrastructure and enhancing affordability. Excluding certain types of providers from the auction process simply decreases competition, increases the cost to deployment, and will only continue to further the existing digital divide for rural Nebraskans.

Until Nebraska has universal broadband access, the Commission should continue to adopt policies that support infrastructure and affordability improvements through competition in partnership with carriers. These policies should, when possible, rely on objective criteria and focus on efficiently using state support to stretch investment dollars as far as possible. Accordingly, all qualified carriers should be eligible to bid in a reverse auction. Disbarment of certain carriers because of their size or previous receipt of Nebraska Universal Service Fund dollars would further put Nebraska behind in broadband deployment.

Windstream would also like to reiterate its previously communicated recommendation to create a more competitive program. The Commission should revert to the previous administration of the NUSF-99 grant program and update the cost modeling to a 75/25 split as that is in line with other broadband programs. These actions would further encourage participation in the process and revert to a program familiar to the Commission and providers in the State, thus reducing the administrative burden of creating new processes and procedures to support a revised program.

Again, Windstream appreciates the opportunity to provide comments in this matter and looks forward to continuing its work with Commission to expand available high-speed broadband in Nebraska.

Respectfully submitted this 8th day of May 2024.

WINDSTREAM NEBRASKA, INC.,

s/ Mary Vaggalis

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Certificate of Service

The undersigned hereby certifies that on this 8th day of May 2024, one (1) electronic copy of the foregoing Initial Comments of Windstream was delivered to the Nebraska Public Service Commission at psc.nusf@nebraska.gov.

s/ Mary Vaggalis

Mary Vaggalis