

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

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

**COMMENTS OF THE
NEBRASKA RURAL BROADBAND ALLIANCE**

INTRODUCTION

The Nebraska Rural Broadband Association (“NRBA”),¹ through its attorneys of record, submits these *Comments* (“Comments”) in response to the *Order Seeking Comment and Notice of Hearing* (“Order”) entered by the Public Service Commission (“Commission”) on April 16, 2024, in the above proceeding, and the *Order Revising Proposed Procedural Schedule and Clarifying Deadline*, entered April 30, 2024 (“April 30 Order”).

COMMENTS

MBU Reserve Prices

In its Order, the Commission seeks feedback on the adjustments it made to MBU reserve prices during the last reverse auction. Generally, the process was much improved. The NRBA applauds the Commission for its progress and the success of the 2023-24 Reverse Auction. Going forward, the NRBA would encourage the Commission to seek more consistency in the size of the MBUs. The large geographical size of some MBUs makes them infeasible, especially in light of current uncertainty with regard to future ongoing support in the same MBU.

¹ For purposes of this proceeding, the NRBA consists of the following carriers: Cambridge Telephone Company; Glenwood Telephone Membership Corporation; Glenwood Network Services; Glenwood Telecommunications, Inc.; Hemingford Cooperative Telephone Co.; Mainstay Communications; Midstates Data Transport, LLC; Mobius Communications; and Pinpoint Communications.

Price Cap Ineligibility

The Commission asks whether carriers that turn back NUSF support or that did not submit projects to claim allocated support should be allowed to bid for that allocated support. The NRBA strongly recommends price cap carriers not be eligible for support redirected through reverse auctions or rural based plans. Between 2005 through the third quarter 2022, Price Cap carriers have recipients of more than \$306.5 million in subsidies from the NUSF alone. During the same period, Price Cap carriers received similar amounts of federal subsidies for their rural Nebraska exchanges. Price Cap carriers should not have a second bite at the apple that they earlier turned down.

Previously Qualified Bidders

The Commission inquires whether it should ease standards for bidders that previously have been determined eligible.

The NRBA supports the Commission's proposal. Unless the Commission has good cause to re-vet previously qualified providers, it should allow them to be deemed pre-qualified by virtue of last year's qualification.

Application Window

The NRBA has no comment on the Commission's proposed application window.

Faster Bidding Rounds

The Commission asks whether it should adopt a faster schedule for bidding rounds. The NRBA would support doing so, especially in later rounds. The Commission should allow at least daily bidding.

Auction Date and Procedural Schedule

The NRBA supports the Auction Date and Procedural Schedule attached to the April 30 Order.

DATED: May 8, 2024

NEBRASKA RURAL BROADBAND
ASSOCIATION

Cambridge Telephone Company;
Glenwood Telephone Membership
Corporation; Glenwood Network Services;
Glenwood Telecommunications, Inc.;
Hemingford Cooperative Telephone Co.;
Mainstay Communications; Midstates
Data Transport, LLC; Mobius
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CERTIFICATE OF SERVICE

The undersigned certifies that an original of the above ***Reply Comments*** of the Nebraska Rural Broadband Association were filed with the Public Service Commission on May 8, 2024, and a copy was served via electronic mail, on the following:

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