

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Nebraska Public Service) Application No. NUSF-139
Commission, on its own Motion, to consider)
appropriate modifications to the high-cost)
distribution and reporting mechanisms in its)
Universal Service Fund program in light of)
federal and state infrastructure grants.)

WINDSTREAM NEBRASKA, INC. COMMENTS

Windstream Nebraska, Inc. (“Windstream”) hereby submits the following comments in response to the Nebraska Public Service Commission’s (“Commission”) request in its *NUSF-139 Order Issuing Findings and Conclusions, Seeking Further Comment, and Setting Hearing* entered on November 6, 2024. Windstream appreciates the time and care Staff took to develop its proposal; it appears to be a prudent way of transitioning the fund from a legacy supported model to one that will support the next generation of communication needs. Windstream believes high-cost areas and companies that serve them should receive support where necessary to deliver advanced telecommunications to Nebraskans.

Using the CostQuest Model

Windstream appreciates the Commission updating the cost modeling in ordering paragraph 3. This is much needed update to help providers with the continuing rise in costs to maintain and operate their networks. However, Windstream would like to see the Commission continue to review the CostQuest data for further updates and adjust the model to reflect these changes. This will ensure the model and support do not lag behind much like the current model has done.

Transitioning Carrier Proceeding

To further ensure that the Commission’s USF program does not fall behind in the rapidly changing communications space, it should, as suggested in ordering paragraph 4, take immediate

steps to develop a formal and streamlined process to define a mechanism by which providers can transition carrier of last resort obligations and USF support in instances where there is a subsidized overbuilder or significant competition.

Clarification on the BDC Map Version

It is unclear which map version the Commission intends to use for its 2025 challenge process. Windstream would suggest it use the FCC's most recently available BDC. For example, should the Commission set its modeling decisions in December 2024, it should use the FCC's recently released June 2024 data. This will ensure the most recent information is being utilized and will truly capture the locations in need of cost support.

Rate Comparability

Windstream notes there is a minor discrepancy in ordering paragraph 12. The Commission refers to the FCC's Urban Rate Survey benchmark as \$92.24; however, the FCC's Urban Rate Survey benchmark is in fact two cents higher at \$92.26. To avoid any confusion Windstream would recommend consistency with the FCC rate.

Conclusion

Windstream appreciates the opportunity to submit comments on this matter and looks forward to the hearing early next month.

Respectfully submitted on this the 25th day of November, 2024.

WINDSTREAM NEBRASKA, INC.

By: /s/ Mary E. Vaggalis

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