

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	)	Progression Order No. 7
appropriate modifications to the high-cost	)	
distribution and reporting mechanisms in its	)	
Universal Service Fund program in light of	)	
federal and state infrastructure grants.	)	

**COMMENTS OF WINDSTREAM**

Windstream Nebraska, Inc. (“Windstream”) hereby submits the following comments in response to the Nebraska Public Service Commission’s (“Commission”) request in its June 20, 2025, NUSF-139 Order Seeking Comment to consider appropriate modifications to the Nebraska Universal Service Fund (“NUSF”) high-cost distribution mechanism and associated reporting requirements. Windstream appreciates and agrees with the framework that the Commission has proposed for transitioning of support and obligations of NUSF to competitive eligible telecommunications carriers. Windstream provides feedback on the cost model updates:

**Cost Model Updates**

For administrative continuity, Windstream encourages the Commission to continue utilizing the current cost model with the existing inputs.

**Timing for Cost Model Updates**

When evaluating the cadence for updating the cost model to include changes due to boundary changes, inflation, or other significant events, Windstream suggests that providers seek off cycle requests for either 1) exogenous events and/or 2) if costs increase greater than 20%. Additionally, Windstream suggests that updating the cost model on a two-year cycle would be sufficient, specifically when coupled with a lever to request an out-of-cycle update.

**Conclusion**

Windstream appreciates the opportunity to submit comments on this matter and looks forward to the workshop in July.

Respectfully submitted on this 1<sup>st</sup> day of July 2025.

WINDSTREAM NEBRASKA, INC.

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**Certificate of Service**

The undersigned hereby certifies that on this 1<sup>st</sup> day of July, 2025, one (1) electronic copy of the foregoing Comments of Windstream was delivered to the Nebraska Public Service Commission at [psc.broadband@nebraska.gov](mailto:psc.broadband@nebraska.gov).

/s/ Sarah Barnett