



**BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION**

In the Matter of the  
Nebraska Public Service  
Commission, on its own  
motion, to explore additional  
funding opportunities in the  
Telehealth Program.

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Application No. NUSF-150

## **COMMENTS OF ALLO COMMUNICATIONS LLC**

ALLO Communications LLC ("ALLO") submits these comments in response to the Order Opening Docket, Seeking Comments, and Setting Workshop entered by the Nebraska Public Service Commission (the "Commission") in this docket on December 16, 2025 (the "NUSF-150 Order"). ALLO appreciates the opportunity to provide comments to the Commission and strongly support the Commission's efforts to establish and fund the Telehealth Pilot Program.

### **INTRODUCTION**

ALLO was founded in Imperial, Nebraska by Brad Moline in 2003, and today is the largest Nebraska-based telecommunications provider. ALLO's 100% fiber network passes nearly 700,000 Nebraskans in communities throughout the State. ALLO provides competitive local telephone, long distance, broadband internet, video, and various advanced and managed services to homes, businesses, and governmental customers throughout Nebraska, Colorado, and Arizona. ALLO maintains status as a statewide eligible telecommunications carrier ("ETC") and participates in various federal programs, including E-Rate.

In the NUSF-150 Order, the Commission seeks comment regarding a Telehealth Pilot Program ("Program") designed to bring the benefits of innovative technologies, educational opportunities, and telemedicine services to rural areas of the State. For the reasons discussed herein, ALLO strongly supports the creation of this Program, encourages the Commission to fund the Program to the greatest extent possible, and is eager to partner with eligible healthcare providers to participate in the program and ensure it is a success. ALLO applauds the

Commission’s efforts to expand telehealth opportunities throughout the State of Nebraska and is excited to support this ongoing initiative.

### **1) Creation of Rural-Focused Pilot Program**

ALLO strongly supports the establishment of the Program, and its focus to ensure high-quality Telehealth solutions are available in rural Nebraska. Most of ALLO’s 30+ Nebraska communities are located in rural areas or “greater” Nebraska. Hundreds of ALLO’s team members live and work in these communities, providing exceptional local service to customers including healthcare facilities and households. For this reason, ALLO has first-hand knowledge of the challenges rural Nebraskans face when trying to access high quality local healthcare services, and that telehealth services are an essential tool that can help bridge this gap.

For this very reason, ALLO has already pursued various telehealth initiatives and partnerships. For almost three years, ALLO’s executive, engineering and product leadership teams (based out of Imperial, Scottsbluff, and Kearney) have collaborated with the University of Nebraska Medical Center (“UNMC”) and others to determine the feasibility of deploying “next-generation” services to rural Nebraska locations. Specific goals to enable and advance current and future technologies include:

- Low latency, high bandwidth connectivity between UNMC and rural locations, including University of Nebraska-Kearney, an office location in Kearney, and Great Plains Regional Medical Center in North Platte.
- Extension of telehealth connectivity and services to households and public spaces.
- Viability of advanced cyber protection.

Example use cases already tested by ALLO include:

- UNMC to University of Nebraska-Kearney connectivity (University of Nebraska's network);
- UNMC to third party office in Kearney connectivity (combining ALLO's last mile fiber with the University's network);
- UNMC to rural critical care hospital in North Platte connectivity (combining existing ALLO connections with the University's network).

During this project, ALLO has donated its costs of demonstrating the feasibility of distributing secure high bandwidth, low latency, secure communications from metro to rural via a ubiquitous all-fiber network. The project's initial returns have been extremely encouraging, and ALLO believes that an additional funding source like the Program proposed in this docket would help optimize, expand, and accelerate these efforts, generating significant public benefit for rural Nebraskans.

Additionally, ALLO's SmartTown program, which allows unused bandwidth from ALLO routers to be used for additional purposes, could be leveraged to help low-income households, individuals with limited mobility, and other vulnerable populations in ALLO communities access advanced telehealth services without leaving their home.

Telehealth is critical to our vast state, and with the continued population migration to the metros, will become even more important in the future. Connections for preparatory learning, real-time/emergency consultation, and specialist advice are vital to Nebraska's rural future. As most currently available program funding in this area will not pay for the construction of new networks, existing fiber investments must be leveraged to enable the future.

## **2 )Commission Evaluation of Program Applications**

When reviewing applications for Program funding, ALLO recommends that the Commission take the following criteria into account. Considering these factors will help ensure that the Program will fund reliable, proven projects and maximize the public benefit generated by the Program:

- Prioritize projects utilizing proven, existing fiber networks without significant funds for fiber or infrastructure extension.
- Prioritize awarding funds to applicants that are Nebraska ETCs with proven operations across both rural and metro Nebraska.
- Prioritize projects with proven feasibility.
- Give preference to public-private-partnerships, focusing on those that connect UNMC sites to other network sites in the State of Nebraska.
- Prioritize funding projects that provide both in-home and community benefits through symmetric high bandwidth, low latency connectivity, including to lower income households.
- Prioritize funding projects supporting the purchase of items that are used for network operations such as servers, routers, firewalls, switches and other devices or equipment necessary for the broadband connection and solutions.
- Prioritize funding projects with scalable, community-wide impacts and in-home applications.

## **CONCLUSION**

For the reasons stated in this Comment, ALLO strongly supports the creation of the

Telehealth Pilot Program, applauds the Commission for its focus on rural connectivity and health, and encourages the Commission to fund the Program to the maximum extent possible. ALLO is eager to participate in this Program and looks forward to continuing to engage with the Commission and other stakeholders as the Program takes shape.

Dated: January 29, 2026

By: \_

A handwritten signature in blue ink, appearing to read "B. Moline", is positioned above the typed name.

Bradley Moline  
Founder & CEO  
ALLO Communications LLC

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 29th day of January, 2026, one (1) electronic copy of the foregoing comment was delivered to the Nebraska Public Service Commission at [psc.nusf@nebraska.gov](mailto:psc.nusf@nebraska.gov). Electronic copies were also delivered to:

**Nebraska Public Service Commission**

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*Andrew Vinton*

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