

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Pinpoint Communications,)	Application No.
Inc., seeking transition of ongoing high-cost)	
Nebraska Universal Service Support for eligible)	PETITION FOR FORMAL
served locations in Windstream Nebraska, Inc.,)	INTERVENTION
territory.)	
)	

PETITION FOR FORMAL INTERVENTION WINDSTREAM NEBRASKA, INC.

Windstream Nebraska, Inc. (“Windstream”), through counsel, hereby submits this Petition for Formal Intervention in the matter relating to the Verified Application submitted by Pinpoint Communications, Inc. on October 2, 2025, seeking transition of ongoing high-cost Nebraska Universal Service Support for eligible served locations in Windstream Nebraska, Inc., territory pursuant to 291 NEB. ADMIN CODE § 01-003.04.

I. Name and address of intervenor

The name and address of the entity seeking intervention are as follows:

Windstream Nebraska, Inc.
2101 Riverfront Drive, Suite A
Little Rock, AR 72202

II. Statement of Interest

Windstream Nebraska, Inc. (“Windstream”) is a party in interest in this proceeding because it is the incumbent local exchange carrier serving the Transition Support Areas identified in the Applicant’s filing and is the current recipient of Nebraska Universal Service Fund (“NUSF”) high-cost support for those areas. The Applicant seeks to transfer ongoing NUSF support from Windstream and to assume carrier of last resort (“COLR”) obligations. As the incumbent provider with existing COLR responsibilities, Windstream has a direct and substantial interest in the outcome of this proceeding.

III. Grounds for Intervention

Windstream's technical, financial, and operational interests will be directly affected by any Commission order approving or modifying the Applicant's requested transfer of NUSF support and COLR obligations. Windstream's participation is necessary to ensure that any transfer of NUSF support is accompanied by an enforceable transfer of COLR responsibilities covering the same geographic areas, with clear demarcations.

Windstream also seeks to ensure that the transfer does not result in "cream-skimming," wherein the transferred support and responsibility is limited to the most economically attractive locations while leaving the highest-cost, hardest-to-serve locations with Windstream but without adequate support.

Further, if multiple COLR providers operate within the same exchange, there is a substantial risk of customer confusion and enforcement challenges regarding who is responsible for service obligations, including constructing, provisioning, and emergency service access. Finally, any partial-area transfer will have consequences for future filings under the Telecommunications Deregulation Act, as COLR obligations within exchange boundaries will no longer be clearly delineated, potentially leading to inconsistent obligations and uncertainty for customers and the Commission.

IV. Facts and Circumstances Relied Upon

Windstream relies upon the Transition Support Area files and maps provided in the Applicant's initial filing and has conducted an initial review to assess the proposed changes. Based on that review, the proposed Transition Support Areas do not fully encompass established exchange boundaries and would result in overlapping COLR responsibilities between Windstream and the Applicant within the same exchanges. A partial-area transfer raises material risks of customer confusion and complicates the administration of service obligations. If support is transferred for selected locations and not others, Windstream could be left serving the highest-cost locations without adequate funding, contrary to the

universal service policy goals of the NUSF and in a manner that would impair service sustainability and future deployment. The proposed changes would directly affect Windstream's operations and finances, including current service offerings, required investments, and buildout obligations in the affected exchanges.

V. Conclusion

For these reasons, Windstream respectfully requests the Commission to grant Windstream's formal intervention to participate fully in this proceeding, including the opportunity to review and test the Applicant's evidence, present Windstream's analysis, and propose conditions necessary to protect customers and ensure a clear, enforceable assignment of COLR responsibilities that is coextensive with any transferred NUSF support.

Respectfully submitted on this the 3rd day of November, 2025.

WINDSTREAM NEBRASKA, INC.

By: /s/ Mary E. Vaggalis
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 3rd day of November, 2025, a copy of the Petition for Formal Intervention was delivered via First Class Mail and electronically to:

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By: /s/ Mary E. Vaggalis
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