

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Nebraska Public)	Application No. NUSF-139
Service 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.)	
)	
)	

PRE-FILED DIRECT TESTIMONY OF CULLEN ROBBINS

Q: Please state your name and spell it for the record.

A: C-U-L-L-E-N R-O-B-B-I-N-S

Q: Where are you employed and in what capacity?

A: I am the Director of the NUSF and Telecommunications Department here with the Commission. I have served in this capacity since 2016.

Q: What is the purpose of your testimony?

A: I am here to provide some brief comments on where we are in this docket and summarize what has been proposed so far.

Q: Can you generally describe the Commission's transition framework proposal?

A: Yes. As the order setting up this hearing indicated, we have already put out a proposed framework for transition of carrier of last resort, or COLR, responsibilities. In the workshop held on July 15th, it seemed like most of the discussion was around more clearly defining some of the terms, and not necessarily regarding the framework that was proposed. With that in mind, I think staff is comfortable with the framework that was put out, and we will see if there is further commentary on that proposal. In short, that proposal required that carriers wanting to receive support for areas that were competitively served would need to take on COLR obligations, be an Eligible Telecommunications Carrier, or ETC, commit to requirements related to offering service to everyone in the designated area, provide

service at speeds of 100/20 Mbps or greater, provide 911 and TRS, offer supported services at reasonable prices, submit speed test data as required, and follow the requirements of being designated as an ETC.

The August 26th order also offered definitions for a couple terms that might have either been unclear and/or used interchangeably. The terms "Support Area" and "Service Area" were defined in the order to provide a clearer distinction between the two. We are comfortable with the proposed definitions, but we are also open to suggestions if there are ways to further distinguish between the two terms.

Q: Can you please provide a summary of where we are with the updated cost model data?

A: Yes. As I know you are aware, we moved forward with an agreement for updated cost model data with CostQuest. Based on feedback from the July 15 workshop, the Commission approved entering into an agreement with CostQuest for cost data based generally on the same network architecture that we have used in prior State Broadband Cost Models, or SBCMs. That network architecture is exchange and study area-based, where service is modeled based on exchange boundaries, and originating from central offices within those exchanges. We did work with CostQuest on fine-tuning some of the model inputs based on information provided directly by the Incumbent Local Exchange Carriers. CostQuest is utilizing that information to develop an updated model output. I want to say thank you to the companies that completed and submitted the data request template.

Q: Do you have anything further to add?

A: No I do not. I'm happy to answer any questions.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 16th day of September, 2025, the foregoing pleading was filed with the Nebraska Public Service Commission and delivered electronically to the following:

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