

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

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

The Rural Telecommunications Coalition of Nebraska (“RTCN”)¹, Nebraska Rural Broadband Association (“NRBA”)² (collectively, the “Parties”), through their attorneys of record, mutually move the Nebraska Public Service Commission (“Commission”) to modify the progression schedule set forth in Progression Order No. 6 (the “Order”), entered by the Commission in this proceeding on April 8, 2025. Currently, the Commission has allowed interested parties to file comments responsive to the Order on or before May 6, 2025, and has set a public hearing for May 14, 2025, at 10:00 a.m. Central Time.

The Parties respectfully request that the Commission schedule a workshop in lieu of a hearing on May 14. The Parties have had considerable discussions about issues raised in the Order. On several key issues, including the cost model update, the use of a minimum support base amount, and continued use of the EARN form, the Parties believe further information is needed before they can provide comments and hearing testimony that will be meaningful to the Commission’s consideration of the important issues it has raised in the Order.

¹ For purposes of this proceeding, the RTCN consists of the following carriers: Arapahoe Telephone Company d/b/a ATC Communications; Benkelman Telephone Company, Inc., Cozad Telephone Company, Diller Telephone Company, Hartman Telephone Exchanges, Inc., Southeast Nebraska Communications, Inc., Pierce Telephone Company, and Wauneta Telephone Company.

² For purposes of this proceeding, the NRBA consists of the following carriers: Cambridge Telephone Company; Glenwood Telephone Membership Corporation; Glenwood Network Services; Glenwood Telecommunications, Inc.; Hemingford Cooperative Telephone Co.; Mainstay Communications; Midstates Data Transport, LLC dba Stealth Communications; Mobius Communications; Pinpoint Communications; Plainview Telephone Company; Stanton Telecom, Inc.; Town & Country Technologies; WesTel Systems, dba Hooper Telephone Company.

The Parties respectfully recommend that the workshop be designed to facilitate an open discussion between Commission staff experts and consultant experts for any interested party. The Parties further recommend that such experts work together to establish an agenda for the workshop that will ensure that the key issues are addressed.

Finally, the Parties recommend the Commission reschedule the deadline for comments responsive to the Order and the public hearing for a date following the workshop, allowing sufficient time for interested parties to consider information acquired at the workshop and engage in further discussions with one another.

The Parties believe the alternative approach recommended above will lead to better policy-making, will be more administratively efficient, and will allow the Commission to continue its investigation more expediently.

FOR THE ABOVE REASONS, the Parties respectfully request the Commission modify the progression schedule set forth in the Order consistent with the above recommendations.

DATED: April 24, 2025

**RURAL TELECOMMUNICATIONS
COALITION OF NEBRASKA**

Arapahoe Telephone Company d/b/a ATC
Communications, Benkelman Telephone
Company, Inc., Cozad Telephone
Company, Diller Telephone Company,
Hartman Telephone Exchanges, Inc.,
Southeast Nebraska Communications,
Inc., Pierce Telephone Company,
Wauneta Telephone Company.

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**NEBRASKA RURAL BROADBAND
ASSOCIATION**

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Corporation; Glenwood Network Services;
Glenwood Telecommunications, Inc.;
Hemingford Cooperative Telephone Co.;
Mainstay Communications; Midstates
Data Transport, LLC dba Stealth
Communications; Mobius
Communications; Pinpoint
Communications; Plainview Telephone
Company; Stanton Telecom, Inc.; Town &
Country Technologies; WesTel Systems,
dba Hooper Telephone Company.

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CERTIFICATE OF SERVICE

The undersigned certifies that an original of the above ***Motion*** was filed with the Public Service Commission on April 24, 2025, and a copy was served via electronic mail, on the following:

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