

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Nebraska)	Application No. NUSF-139
Public Service Commission, on its)	
own motion, to consider appropriate)	Progression Order No. 8
modifications to the high-cost distribution)	
and reporting mechanisms in its Universal)	
Service Fund program in light of federal)	
and state infrastructure grants.)	

COMES NOW the Rural Telecommunications Coalition of Nebraska (“RTCN”), by and through its attorneys of record, and hereby respectfully submits the attached Pre-filed Direct Testimony of Russell Westerhold in response to the Order Requesting Pre-Filed Testimony and Setting Hearing, entered on August 26, 2025 in the above-captioned matter.

DATED: September 16, 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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PREFILED DIRECT TESTIMONY OF RUSSELL WESTERHOLD

ON BEHALF OF

THE RURAL TELECOMMUNICATIONS COALITION OF NEBRASKA

September 16, 2025

Q: PLEASE STATE YOUR NAME AND ADDRESS FOR THE RECORD.

A: My name is Russell Westerhold. My address is 1233 Lincoln Mall, Suite 200, Lincoln NE 68508. I am counsel of record in this proceeding for the Rural Telecommunications Coalition of Nebraska.

Q: ON WHOSE BEHALF ARE YOU PROVIDING TESTIMONY?

A: I am testifying on behalf of the Rural Telecommunications Coalition of Nebraska (“RTCN”). The current members of the RTCN are Arapahoe Telephone Company d/b/a ATC Communications; Benkelman Telephone Company, Inc., Cozad Telephone Company, Hartman Telephone Exchanges, Inc., Diller Telephone Company, Southeast Nebraska Communications, Inc., Pierce Telephone Company, and Wauneta Telephone Company. RTCN members are rural local exchange companies providing voice and broadband services to their customers in Nebraska.

Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A: The purpose of my testimony is to provide general support for the Commission’s proposed framework for transitioning high-cost support and carrier of last resort (COLR) obligations to competitive Nebraska Eligible Telecommunications Carriers (NETCs).

Q: BEGINNING WITH THE COMMISSION’S PROPOSED REQUIREMENTS FOR TRANSITIONING COMPETITIVE CARRIERS INTO THE HIGH-COST PROGRAM, WHAT IS RTCN’S POSITION?

A: As an initial matter, the RTCN agrees with the two “fundamental principles” suggested by the Rural Independent Companies (RIC) on this topic: (1) high-cost support should be provided to only one facilities-based provider in a given support area; and (2) competitive carriers seeking high-cost support should be subject to the same requirements as ILECs.

Our earlier comments in this docket express that, at a minimum, the following requirements should be imposed on competitive carriers seeking NUSF support:

- Nebraska eligible telecommunications carrier (“NETC”) designation and a commitment to offering voice and the NUSF supported services;
- Assumption of carrier of last resort (“COLR”) obligations;
- Provision of broadband service to all supported locations at the required speeds
- Verification of speed requirements through the Commission’s current speed testing protocol
- Participation in existing affordability programs or an equivalent commitment to providing affordable service offerings.¹

We read the Commission’s Order dated August 26, 2025 to include these requirements.

Therefore, the RTCN is supportive of the Commission’s proposal in this regard.

Q: DOES RTCN AGREE WITH THE COMMISSION’S PROPOSED DEFINITION OF A “SUPPORT AREA”?

A: We support the Commission’s proposed definition and also agree with the Commission’s intention to permit petitioners to define an individual “support area” by submitting a shapefile of the proposed locations for which NETC designation is sought.

Q: DOES THE RTCN HAVE ANY ADDITIONAL INPUT ON THE PROPOSED FRAMEWORK OR OTHER ISSUES IDENTIFIED IN THE ORDER?

A: The RTCN recognizes the Commission’s proposed framework as a good “jumping off point” to begin transitioning support to competitive NETCs. Like any new process, experience

¹ *Comments of the Rural Telecommunications Coalition of Nebraska* dated December 22, 2023, Docket No. NUSF-139; *Comments of the Rural Telecommunications Coalition of Nebraska* dated July 1, 2025.

will dictate whether changes are required. The Commission's Order recognizes, and we agree, that "there may be a need for initial flexibility to address some unanticipated issues as they arise." We are confident in our ability to work with the Commission and its staff to address any such unanticipated issues.

Q: DOES THIS CONCLUDE YOUR TESTIMONY?

A: Yes.