

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Nebraska Public Service	)	Application No. NUSF-133
Commission, on its own motion, to implement	)	Progression Order No. 3
standards for the verification of broadband	)	
service provider coverage and speed data.	)	
	)	
	)	

COMMENTS OF WINDSTREAM

Windstream Nebraska, Inc. (“Windstream”) hereby submits the following comments in response to the Nebraska Public Service Commission’s (“Commission”) request in its October 7, 2025, NUSF-133 Order Seeking Comment to consider the implementation of standards for the verification of broadband service provider coverage and speed data. Windstream offers the following feedback on the speed testing requirements for the Commission’s consideration:

1. Testing Requirements Framework

Windstream agrees that the Commission’s current speed testing requirements are consistent with those of the Federal Communications Commission (“FCC”) and appreciates the Commission’s efforts to streamline compliance obligations for providers. Windstream further recommends that the Commission continue to offer an alternative compliance method for providers that can justify why standard testing is not feasible. To promote administrative efficiency, Windstream encourages the Commission to recognize that most internet service providers are already required to submit service availability data to the FCC via Broadband Data Collection (BDC) reporting twice a year and to publish and maintain accurate Broadband Nutrition Labels. Compliance with these federal requirements should be considered sufficient to meet duplicative testing obligations.

2. Frequency and Timing of Tests

As the deployment and adoption of fiber technology increases, the testing framework should adapt accordingly. For example, due to the characteristics of fiber networks, latency testing is not the best indicator of performance and therefore should not be required.

3. Alternative Testing

Windstream recommends that the Commission continue to permit Alternative Testing compliance methods when justified by the provider and that this option be broadly available and not limited to new deployments. Specifically, providers should be allowed to use file-based testing instead of time-based testing, and the required test duration should be adjusted appropriately when file-based testing is utilized.

4. Equipment Limitations and Customer Participation

A provider should not be precluded from compliance in a situation where a customer declines testing equipment and Windstream appreciates the Commission's recognition of this scenario. Windstream recommends that the Commission develop a template certification for such instances or extend the testing timeframe to allow providers to acquire additional households in the area.

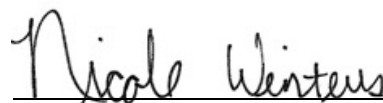
Conclusion

Windstream appreciates the opportunity to submit comments on this matter.

Respectfully submitted on this 14th day of November, 2025.

WINDSTREAM NEBRASKA, INC.

By:



Sr. Director – Regulatory Counsel

Certificate of Service

The undersigned hereby certifies that on this 14th day of November, 2025, one (1) electronic copy of the foregoing Comments of Windstream was delivered to the Nebraska Public Service Commission at psc.nusf@nebraska.gov.

