

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Commission, on its) Rule and Regulation No. 214
own motion, seeking to update and amend)
Title 291, Chapter 5, Telecommunications,) **COMMENTS**
in its entirety.)
)
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)

NEBRASKA RURAL BROADBAND ALLIANCE

The Nebraska Rural Broadband Association (“NRBA”),¹ through its attorneys of record, Rembolt Ludtke LLP, respectfully submits these comments in response to the *Order Opening Docket, Releasing Proposed Rules and Setting Workshop* entered by the Public Service Commission (“Commission”) on September 23, 2025 (“Order”). The NRBA generally supports the Commission’s proposed changes and will comment only on those few proposed changes that cause concern. The NRBA commends the Commission on its arduous work in removing obsolete and unduly burdensome regulations.

002.09 RESPONSE TIME; AUTOMATED CALL ANSWERING SYSTEMS

The NRBA does not support proposed rule 002.09 and recommends it be stricken entirely or altered significantly. As written, the rule would be unduly burdensome, would be difficult to enforce, and would lead to unnecessary costs. Lastly, the requirement does not have a clear enforcement mechanism and would likely need to be significantly retooled to provide the value it seeks.

The proposed rule would be unduly burdensome because it would be a difficult metric to track. For smaller companies that do not already track response times per call or do not have phones that are capable of efficiently tracking response times and producing data that

¹ 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 Broadband; Mobius Communications; Pinpoint Communications; Plainview Telephone Company; Stanton Telecom, Inc.; Town & Country Technologies; WesTel Systems, dba Hooper Telephone Company.

demonstrates this information, they would have to create systems or buy new technology to monitor and analyze response times. Additionally, because the response times benchmarks referenced within 002.09(B), are required on a monthly basis the reporting obligation would be frequent. On a monthly basis this data collection could potentially be too frequent to show trends that demonstrate a carrier's lack of adequate customer service.

Further, while the largest carriers in the state may be able to comply with the language of this proposed rule, the lack of a proposed compliance system could lead to confusion and inconsistency. The proposed rule would presumably come with an increased reporting requirement, which would take time and effort away from the core business of providing broadband to customers.

Finally, the proposed rule is not clear or reasonably targeted. If providers self-report the times they register between automated and live representative calls, there would be inconsistency in how providers report this information, leading to issues regarding the veracity of reporting. Additionally, the proposed rules lack a clear enforcement process which could lead to providers being penalized each month for a benchmark that does not accurately reflect customer service quality. This is both unnecessary and potentially costly for providers.

While the NRBA recognizes that there is a necessity in ensuring that providers are responsive to customer concerns, this rule, as written, would create problems for the industry. The NRBA suggests that this rule be removed entirely or alternatively significantly altered to provide clarity.

002.24(B) EXCHANGE BOUNDARY CHANGES

The NRBA urges the Commission to be cautious in implementing new and revised rules regarding boundary changes. The current framework for transitioning Nebraska Universal Service Fund (“NUSF”) Support and its corresponding regulatory obligations has been developed over years of collaboration. As the Commission seeks to update rules regarding the process of exchange boundary changes, it needs to ensure that these rule revisions are narrowly tailored to not disturb the NUSF-139 transition support framework.

Conclusion

The NRBA looks forward to collaboration with the commission and other commenters.

DATED: December 4, 2025

NEBRASKA RURAL BROADBAND
ASSOCIATION

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
Broadband; Mobius Communications;
Pinpoint Communications; Plainview
Telephone Company; Stanton Telecom,
Inc.; Town & Country Technologies;
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CERTIFICATE OF SERVICE

The undersigned certifies that an original of the above *Comments* of the Nebraska Rural Broadband Association were filed with the Public Service Commission on December 4, 2025, and a copy was served via electronic mail, on the following:

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