RECEIVED
By Traci.Christman at 1:54 pm, Oct 30, 2026

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

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

COMMENTS BY ALLO COMMUNICATIONS LLC IN RESPONSE TO ORDER RELEASING SECOND PROPOSED RULES

ALLO Communications LLC ("ALLO") submits these Comments in response to the Order Releasing Second Proposed Rules, Seeking Comment and Setting Hearing entered by the Nebraska Public Service Commission (the "Commission") in this matter on October 6, 2026 (the "October 6 Order"). ALLO appreciates the opportunity to offer its comments to the Commissions proposed revisions to the Telecommunications Rules and Regulations.

All Sections referenced herein refer to the version of the proposed revised rules included in the October 6 Order as "Attachment B."

1. Comments to Transfers of Control (Section 002.23)

In the October 6 Order, the Commission proposed modifications to Section 002.23 which apply to Commission practices regarding transfers of control of exchange carriers. Namely, the modified rules add a new Section 002.23(C), which reads as follows: "Direct ownership of a certificated carrier may not change absent approval by Commission order. The Commission may review indirect transfers of control of certificated carriers, including a change of ownership at the holding level or pro forma company reorganizations, on a case-by-case basis as required by the public interest." (*see* October 6 Order, Attachment B, p. 22). ALLO would offer the following comments on the Commission's proposed modifications to this Section:

a. ALLO suggests a shot clock for Commission review and action regarding an application for transfer of direct ownership of an exchange carrier be added to the rules. The Commission should

issue an order within forty-five (45) days of the filing of such an application if no hearing is held, or within ninety (90) days if a hearing is held.

b. For any indirect transfer of control, including a change of ownership at the holding level, Commission review and approval should be discretionary. Commission approval should only be required if necessary to protect the public interest. If the Commission determines that Commission review and approval is necessary, the Commission should issue an order within forty-five (45) days of the filing of such an application if no hearing is held, or within ninety (90) days if a hearing is held.

c. For any transfer of control which is purely pro forma in nature and does not result in the transfer of customers in Nebraska, the transfer of certificates of authority, or material changes in the operations of the certificated carrier in Nebraska, the certificated carrier should only be required to deliver written notification of the transaction to the Commission. Commission review and approval should not be required.

ALLO appreciates the Commission's review of these comments to the second set of proposed changes to Title 291, Chapter 5, of the Commission's Rules and Regulations, and looks forward to further discussion and participation in this matter.

DATED this 30th day of October, 2026.

Submitted by:

ALLO Communications LLC

By : _____

Andrew Vinton, #26870
General Counsel
ALLO Communications LLC
330 S 21st St Lincoln, NE 68510
(402) 781-4698
Andrew.vinton@allofiber.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 30th day of October 2026, electronic copies of the foregoing comments were delivered to the Nebraska Public Service Commission at traci.christman@nebraska.gov and psc.telecom@nebraska.gov, and to the following parties of record in this proceeding:

pschudel@woodsaiken.com
Deonnebruning@neb.rr.com
joselyn@zulkoskiweber.com
lbrooks@brookspanlaw.com
mary@bruninglawgroup.com
julia@kelleyplucker.com
toneill@ntaonline.net
rwesterhold@ewmlobby.com
apollock@remboltlawfirm.com

Andrew Vinton