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By Traci.Christman at 1:23 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**

NEBRASKA RURAL BROADBAND ALLIANCE

The Nebraska Rural Broadband Alliance ("NRBA"),[1] through its attorneys of record, Rembolt Ludtke LLP, respectfully submits these comments in response to the *Order Opening Docket, Releasing Second Proposed Rules and Setting Workshop* entered by the Public Service Commission ("Commission") on October 6, 2026 ("Order"). The NRBA generally supports the Commission's proposed changes. The NRBA commends the Commission on its arduous work in removing obsolete and unduly burdensome regulations.

1. Definitions

The NRBA has no objection to the definitional rule changes proposed by the Commission. In particular, the NRBA supports the Commission's proposed new language for defining "local exchange service."

2. Wire Crossing Agreements

The NRBA supports the Commission's proposed changes to Section 011, relating to wire crossing agreements.

[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.

3. Operator Rules

The NRBA supports the Commission's proposed removal of Section 002.08, which are obsolete operator rules.

4. Response Time and other Objectives

The NRBA recommends a **workshop** prior to the hearing to discuss rules relating to response time, answering time objectives, dial service objectives, and loop transmission objectives. A workshop will be a more suitable method of resolving these issues than dueling sets of written comments.

5. Payphones

The NRBA supports removal of the Section 002.13, which establishes rules relating to customer-provided semi-public telephones.

6. Directories

The NRBA supports the change proposed by the Commission in Section 002.19, relating to telephone directories.

7. Service Area; Exchange Maps

The NRBA supports the change proposed by the Commission in Section 002.021, relating to corrections to exchange boundary maps.

8. Filing Commercial Agreements

The NRBA supports the Commission's proposal to eliminate Section 002.29, which regulates the filing of commercial agreements.

9. Transfers of Control

The NRBA believes that the Commission has authority to approve or deny transfers in direct ownership of a certificated carrier and that the Commission may review of indirect transfers of control of certificated entities on a case-by-case basis as required by the public interest. The NRBA does not object to the addition of a rule making this clarification.

10. Extended Area Service

The NRBA supports the RIC's proposal to eliminate parts of Section 002.26 allowing the establishment of Extended Area Service ("EAS"). Current Subsections 002.26(A), (B), (C), (D), and (G) should be removed. The NRBA also supports the RIC's recommendation to preserve the subsections relating to EAS discontinuance. Subsections (E) and (F) should be retained.

11. Reinstatement of Subscribers in Premium Programs

The NRBA supports the removal of Section 004.07, relating to reinstatement of subscribers in premium programs.

12. Eligible Telecommunications Carriers

The NRBA opposes the proposed additional requirement in current Subsection 007.02(A)(vii) [proposed Subsection 009.02(A)(vii)] that eligible telecommunications carriers (ETCs) provide customers who receive service that requires a separate power source with access to at least eight hours of back-up power at no additional charge. This rule is inconsistent with regulations of the Federal Communications Commission ("FCC"). The FCC recently sun-setted regulations that formerly required ETCs to provide eight hours of power.[2] That federal rule was cost-prohibitive for ETCs, as would be the rule proposed by the Commission.

13. Telecommunications Relay System

The NRBA supports the changes recommended by the Commission in current Section 010 [proposed Section 008], relating to the Telecommunications Relay System.

14. Exchange Deregulation

[2] *See* 47 C.F.R. § 9.20.

The NRBA has no comment on the issues raised in the Order related to current Section 015 [proposed Section 013], related to exchange deregulation.

15. Treatment of Confidential Information

The NRBA has no objection to the Commission's proposed changes to current Subsection 0017.01(C) [proposed Subsection 0015.01(C)], relating to treatment of confidential information.

16. Rural Communications Sustainability Act

The NRBA supports the Commission's findings relating to regulations relating to the Rural Communications Sustainability Act.

17. Other Issues

The NRBA is concerned about the rising number of service interruptions, especially those caused by price cap carriers that are not promptly remedied. Those service interruptions often affect other interconnected carriers, causing outages to customers of those other carriers. While this rulemaking proceeding may not be the right forum for addressing such concerns, the NRBA strongly urges the Commission to treat service interruptions seriously and take action to cause the reduction of outages. For example, a recent incident involving Uniti caused a four-day interruption of service for other carriers and their customers, including at least two hospitals. This incident should alarm the Commission as a risk to public safety. Lumen outages have caused similar problems. *See* Attachment A.[3]

DATED: October 30, 2026

[3] Correspondence from the Nebraska Telecommunications Association to the Nebraska Public Service Commission, October 2, 2026.

NEBRASKA RURAL BROADBAND ALLIANCE

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.

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CERTIFICATE OF SERVICE

The undersigned certifies that an original of the above ***Comments*** of the Nebraska Rural Broadband Alliance were filed with the Public Service Commission on October 30, 2026, and a copy was served via electronic mail, on the following:

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NEBRASKA TELECOMMUNICATIONS ASSOCIATION
528 South 13th St., Suite B Lincoln NE 68508

October 2, 2026

Honorable Tim Schram
Chairman, Nebraska Public Service Commission
1200 N Street, Suite 300
Lincoln, Nebraska 68508

Re: Request for Investigation of Lumen Outages
Impacting NTA Companies in Nebraska

Dear Commissioner Schram:

I am writing on behalf of NTA-member companies to request an investigation of multiple incidents of equipment failures in the Lumen network that resulted in outages leaving our companies largely unable to receive terminating traffic or for their customers to place outbound toll and toll-free calls. In some instances, 911 service was interrupted for significant periods of time.

Unfortunately, these do not appear to be isolated incidents. While the most recent events in August and September had the greatest impact on carriers in northeast parts of the state, carriers in central and western Nebraska have also had their share of multiple problems since at least May with Signaling System 7 (SS 7) connectivity and events that, while not meeting the PSC definition of a reportable outage, have caused concerns.

At a minimum, we believe the following issues should be reviewed by the commission and addressed:

- The condition of legacy equipment owned and operated by Lumen;
- Lumen's plans to upgrade or repair equipment that is no longer reliable;
- Availability of Lumen personnel to repair broken or damaged equipment and operating systems;
- The apparent lack of redundancy in the network;
- Trouble ticket reporting by Nebraska LECs and lack of timely responses by Lumen; and
- 911 service outages

I have attached a memorandum provided to me by Jeff Kesting, CO/Plant Manager at Pierce Telecommunications, with a timeline and explanation of the recent outage events in August and September in northeast Nebraska.

We look forward to your response. Thank you for your consideration.

Sincerely,

Thomas "Tip" O'Neill, Jr.
President
toneill@nebraskatelecom.com

cc PSC Commissioners and PSC Executive Director
Century Link, registered agent for Lumen
NTA Members and interested parties

Attachment A