

**Nebraska Central Telephone Company
Comstock Village Limits Underserved
Attachment J**

Digital Inclusion Plan

Nebraska Central Telephone Company (NCTC) is committed to digital equity, as highlighted in this Digital Inclusion Plan (the “Plan”). NCTC will provide education, support, and broadband affordability options in an effort to increase broadband adoption, understanding, and use for all individuals; particularly for those who may lack other resources. The COVID-19 public health emergency (the “Pandemic”) punctuated the critical need for all Nebraskans to be able access to work, school, and healthcare remotely. The construction of a fiber network in Comstock will help enable all residents to be able to access work, school, and healthcare remotely. When complete, the buried fiber to the home network will give access to broadband capable of handling all work, education, and healthcare monitoring needs to all Comstock residents. NCTC believes that implementing the Plan in Comstock will help ensure that low-income and disadvantaged individuals are able to access broadband at an affordable price.

NCTC is committed to finishing construction of a buried fiber to the home network that delivers broadband to every serviceable location in its ILEC territory. NCTC’s dedication to digital equity starts with that commitment. Although NCTC is not creating a low-cost option in the Digital Inclusion Plan category due to implementation considerations, NCTC is proud to participate in both Lifeline and the Affordable Connectivity Program (ACP) and would note that an ACP subscriber can elect to receive our most affordable internet tier for just a few dollars a month. NCTC serves some of the more rural areas of Nebraska and is proud of the quality and cost of its service. NCTC is committed to offering 100/100 Mbps service at \$65.00 in the project area for a minimum of five years.

NCTC consulted with the Comstock community and considers affordability.

The process of consulting with the Comstock community and considering affordability is vital to NCTC’s business. NCTC has engaged with community leaders regarding this Capital Project Fund grant application. NCTC’s Community Engagement Manager, Bob Krier, has interacted with the community of Comstock during his nearly 25 years of working

for NCTC. Mr. Krier emailed a letter and Community Feedback form to community leaders. A copy of the letter along with the emails are included in this Attachment J. The letter was email to the Comstock Village Clerk, Debbie Ritz, as well as Keith Ellis from Custer Economic Development Corporation. NCTC will continue outreach efforts with the community as the grant process moves forward through communication, education, and marketing.

In addition to the familiarity with the community from providing telecommunications service there for decades, NCTC has analyzed 2020 Census Data for the project area. Based on the demographics and because fiber internet has not yet been available to Comstock citizens, NCTC believes that there is a specific need for education and subsidy awareness in the village of Comstock. When examining the most recent census data from Comstock (accessed at <https://censusreporter.org/profiles/16000US3110180-comstock-ne/> on February 16, 2023), socioeconomic trends are clear. The per capita income in Comstock is \$25,508, which is about 25% lower than the Nebraska average of \$35,189. This demographic snapshot of the community helps NCTC identify that there are a high number of residents who qualify for Lifeline and ACP and the educational component of this Plan will help bridge the digital divide.

NCTC participates in the Nebraska Telephone Assistance Program (NTAP), Lifeline, and ACP to help bridge the digital divide.

NCTC recognizes the importance of providing broadband access to all customers and participates in NTAP, Lifeline and the ACP program to help supplement the cost of broadband to those who qualify.

NTAP and Lifeline

NCTC participates in NTAP, a government program that offer qualified households a discount on their broadband internet or telephone service. This non-transferable program provides monthly service discounts for qualifying service. NTAP reduces the cost of service up to \$12.75 per month.

NTAP is a government assistance program administered by the Nebraska Public Service Commission. To qualify for NTAP, subscribers must be approved by the Lifeline National Verifier. All applicants must be approved via electronic record checking or by providing documentation showing a household income that is at or below 135% of the Federal Poverty

Guidelines, or the subscriber, one or more of the subscriber's dependents living in the same household must provide documentation showing they receive benefits from one of the following assistance programs:

- Medicaid,
- Federal Public Housing Assistance,
- Children's Health Insurance Program (CHIP),
- Supplemental Nutrition Assistance Program (SNAP),
- Supplemental Security Income (SSI), and
- Veterans Pension Benefit/Survivors Pension Benefit.

ACP Program

NCTC is proud to be participating in the ACP, which allows eligible households to save up to \$30 a month on internet service. The ACP is a Federal Communications Commission (FCC) benefit program that assists customers in the purchase of internet access. A household is eligible if one member of the household has at least one of the following qualifications:

- Participates in certain assistance programs, such as SNAP, Medicaid, Federal Public Housing Assistance, SSI, WIC, or Lifeline;
- Participates in Tribal specific programs, such as Bureau of Indian Affairs General Assistance, Tribal TANF, or Food Distribution Program on Indian Reservations;
- Participates in the National School Lunch Program or the School Breakfast Program, including through the USDA Community Eligibility Provision;
- Received a federal Pell Grant in the current year; or
- Meets the eligibility criteria for a participating provider's existing low-income internet program.

The ACP is non-transferable and is limited to one discount per household. A customer who qualifies can apply the credit to whatever internet plan they choose. Upon the program's conclusion, subscribers will be subject to NCTC's regular rates, terms, and conditions.

NCTC will provide digital inclusion and literacy training to the residents of Comstock to help residents use the Internet, enhance their understanding of broadband, and determine if they qualify for any service subsidies.

NCTC has a team of highly trained technicians and personable, caring customer support representatives who are available to provide training within each of our communities to further enhance understanding and usage of Internet services, enhancing basic literacy skills and increasing comfort levels with accessing the Internet. NCTC will provide training in each of the communities designed to increase knowledge of the Internet and enhance the comfort level and skill of individuals that provide understanding in a non-intimidating format. By increasing the

confidence of individuals in using the Internet, it is our goal that increased literacy and Internet adoption can be achieved, closing the gap in digital literacy.

NCTC and Hamilton have provided trainings on many topics, including those outlined here in other communities and would plan to offer training, including on the topics below. Training may be held in person, or virtually via webinar for each community, depending on comfort level and ways to best reach the individuals in need of the training. Some examples of past trainings include:

- Broadband Basics & Safety – For individuals who are new to going online or don't quite feel comfortable doing so, this is a great place to start.
- Broadband Productivity – Training to learn more about the tools available on the Internet that aid in productivity and organization.
- Broadband Office – Learn how to use the free, office-based Google Drive, Docs and Sheets tools.
- Broadband Memories – Learn how to use the Internet to create photo albums, photo sharing and store your most precious memories.
- Broadband Safety – Learn how to protect yourself, your data, and finances while online and recognize suspicious requests or pop ups.

By increasing the confidence and digital literacy in current non-adopters, including the elderly and low-income populations, we believe the objectives of increased adoption and utilization can be achieved.

How the project will meet the objective of providing broadband infrastructure deployment within the project area to directly enable work, education, and healthcare monitoring and address a critical need that resulted from or was made apparent or exacerbated by the COVID-19 public health emergency.

The proposed fiber project will directly enable work, education, and healthcare monitoring. Because every serviceable location in the village of Comstock will have the ability to elect internet speeds of 1/1 Gbps, this buried fiber to the home project will enable the entire community to attend school, work, and receive healthcare from the comfort of their own homes. This broadband project will enable greater access to and use of information and communication technologies within the Comstock community, including individuals and communities that are the most disadvantaged. Upon completion of the project, all Comstock residents will have access to reliable broadband that is fast enough to enable whatever work, education, or healthcare task a subscriber is needing to do.

The project will help address a critical need that resulted from or was made apparent or

exacerbated by the Pandemic. Due to the size of Comstock and its location, its residents are fairly isolated. Comstock does not have a school, healthcare facility, or grocery store. Absent telehealth access, a resident of Comstock has to travel to go to a medical appointment. Although the COVID-19 public health emergency did not create the lack of medical and other resources located within the Comstock community, the need to access telehealth as an alternative to in-person medical care was made apparent and exacerbated by the Pandemic. There were times during the pandemic where clinics would not allow people with certain symptoms to go to that clinic in person. And individuals may prefer to attend an appointment virtually utilizing their broadband connection over visiting a clinic. The network will also address the critical need of education and work as well by enabling Comstock residents to work and attend school from the comfort of their own homes. Because this fiber project will increase access to school, work, and healthcare, this project will truly impact the Comstock community in a meaningful way.

The pricing structure of the 100/100 Mbps plan being offered to low-income subscribers in addition to the availability of Lifeline or Affordable Connectivity Program (ACP) discounts and any additional terms and conditions of service.

NCTC is committed to offering broadband service at a fair price to all customers. NCTC has been engaged in our communities. On a CPF grant application, an applicant can score points in the Digital Inclusion category by creating and implementing a discounted service plan for low-income subscribers that can be combined with Lifeline or ACP discounts. NCTC agrees with that objective, but simultaneously recognizes that creating an additional service offering for a select category of people is a challenging logistic undertaking and after thoughtful consideration, chooses not to do so at this time.

Conclusion

Implementing the steps outlined in NCTC's Digital Inclusion Plan will help ensure that all residents of Comstock have the knowledge, ability, and access to resources to subscribe to broadband. NCTC takes its obligation in helping to bridge the digital divide seriously and believes that this Plan will help maximize the potential impact this network will have. The Capital Project Fund broadband grants will be a great success in Nebraska and NCTC is excited about the prospect of participating.

List of documents included with Attachment J

1. Email to Debbie Ritz;
2. Letter sent to Debbie Ritz;
3. Email to Keith Ellis; and
4. Letter sent to Keith Ellis.

Benjamin Dennis

From: Bob Krier
Sent: Monday, February 20, 2023 2:58 PM
To: Benjamin Dennis
Subject: FW: Comstock Fiber Optic Grant Opportunity
Attachments: Comstock_Capital Project Fund Community Letter.pdf; 2023 CPF Community Feedback Form Template.pdf

Ben I forgot to attach you in this one.

Bob Krier | Hamilton Telecommunications

O: 308.468.6341 | bob.krier@hamiltontel.com | HamiltonTel.com



 [Hamilton Telecom](http://HamiltonTelecom) |  Hamilton-Telecommunications

From: Bob Krier
Sent: Monday, February 20, 2023 2:57 PM
To: comstock@nctc.net
Subject: Comstock Fiber Optic Grant Opportunity

Debbie,

Thank you for your time this afternoon. Attached is the letter we discussed, along with a form that can be sent to the public service commission in support of the project if desired. The form is due no later than April 24, 2023

Thanks again, I will be in touch once we hear back on the process. Please let me know if anyone has any questions.

Bob Krier | Hamilton Telecommunications

O: 308.468.6341 | bob.krier@hamiltontel.com | HamiltonTel.com



 [Hamilton Telecom](http://HamiltonTelecom) |  Hamilton-Telecommunications



1006 Twelfth Street • Aurora, Nebraska 68818
voice 402.694.5101 • TTY 800.821.1834
toll free 800.821.1831 • fax 402.694.2848
e-mail: info@hamiltonel.com
website: HamiltonTel.com

February 20, 2023

VIA Electronic Mail

RE: Seeking Community Feedback on Proposed Broadband Deployment Project

Dear Comstock Village Board:

My name is Bob Krier and I am the Community Engagement Manager at Nebraska Central Telephone Company (NCTC). NCTC provides telephone, cable, and internet services in the Comstock telephone exchange area, along with 19 other exchanges located throughout central Nebraska. In October of 2021, NCTC was acquired by Hamilton Telecommunications (Hamilton), a telecommunications provider based in Aurora. Hamilton is committed to finishing construction of a buried fiber broadband network capable of delivering ultra-fast internet speeds to every home in the service territory. The purpose of this letter is to inform you that NCTC intends to apply to the Nebraska Public Service Commission for a Capital Projects Fund grant to provide broadband internet service in your community. We are seeking feedback from impacted communities regarding the proposed project.

Please review the details of the proposed project below and provide feedback via the attached Community Feedback Form to the Public Service Commission **no later than April 24, 2023.**

If funded, the grant will be used to deploy buried fiber broadband to every serviceable location in Comstock. The new fiber will be connected to NCTC's existing buried fiber network. The grant funding would alter NCTC's deployment timeline and help us complete this project faster.

As part of the grant process, NCTC is committed to offering an introductory 100/100 Mbps plan to all customers in the project area at \$65 for a period of at least five years. In addition, our proposed speed tiers and pricing for the first five years of the network (which are our current prices for the rest of our customers) are below. Although NCTC has traditionally tried to not raise prices year over year, we do reserve the right to raise the proposed pricing below by no more than 10% per year over that five year period.

Fiber to the Home Data Only Plans	Price per Month
75 Mbps Down x 25 Mbps Up	\$74.95
300 Mbps Down x 50 Mbps Up	\$89.90
1 Gig Down x 250 Mbps Up*	\$110.90

The Data Only fiber plans are available to our fiber customers and do not require a phone line or transport fee.

Fiber to the Home Plans for Hamilton Telephone Subscribers	Price per Month
50 Mbps Down x 25 Mbps Up	\$49.95
250 Mbps Down x 50 Mbps Up	\$64.95
1 Gig Down x 250 Mbps Up*	\$89.90

The proposed project area may also be viewed on the Nebraska Broadband Map, which will be made available on or around March 3, 2023 at <https://psc.nebraska.gov/telecommunications/nebraska-broadband-bridge-program-nbbp>.

If you have questions regarding the proposed project, you may contact me at (308)468-6341 or at bob.krier@hamiltontel.com. If you have questions regarding the Capital Projects Fund grant program, please e-mail psc.broadband@nebraska.gov or you may contact the Nebraska Public Service Commission Consumer Advocate during regular business hours (Monday-Friday, 8:00 a.m.-5:00 p.m. CT) by calling 402-471-3101 or toll free in Nebraska at 1-800-526-0017.

Sincerely,

Bob Krier

Bob Krier
Community Engagement Manager

Cc: Nebraska Public Service Commission psc.broadband@nebraska.gov

Benjamin Dennis

From: Bob Krier
Sent: Wednesday, February 22, 2023 10:04 AM
To: Benjamin Dennis
Subject: FW: Comstock and Mason City Fiber Optic Grant Opportunity
Attachments: custer_county.pdf; 2023 CPF Community Feedback Form Template.pdf

Bob Krier | Hamilton Telecommunications

O: 308.468.6341 | bob.krier@hamiltontel.com | HamiltonTel.com



 [Hamilton Telecom](https://www.facebook.com/HamiltonTelecom) |  [Hamilton-Telecommunications](https://www.linkedin.com/company/Hamilton-Telecommunications)

From: Bob Krier
Sent: Tuesday, February 21, 2023 1:39 PM
To: 'custerdevelopment@gmail.com' <custerdevelopment@gmail.com>
Subject: Comstock and Mason City Fiber Optic Grant Opportunity

Mr. Ellis,

This is Bob Krier with Nebraska Central Telephone Company (NCTC) in Gibbon. In late 2021, Hamilton Telecommunications in Aurora acquired NCTC. Hamilton is committed to constructing fiber in our exchange communities in the coming years. Currently, there is a grant opportunity that we are pursuing to assist with that buildout. Attached to this email is a Letter and Community Feedback Form that contains more information.

Please do not hesitate to contact me if you have any questions.

Bob Krier | Hamilton Telecommunications

O: 308.468.6341 | bob.krier@hamiltontel.com | HamiltonTel.com



 [Hamilton Telecom](https://www.facebook.com/HamiltonTelecom) |  [Hamilton-Telecommunications](https://www.linkedin.com/company/Hamilton-Telecommunications)



1006 Twelfth Street • Aurora, Nebraska 68818
voice 402.694.5101 • TTY 800.821.1834
toll free 800.821.1831 • fax 402.694.2848
e-mail: info@hamiltontel.com
website: HamiltonTel.com

February 20, 2023

VIA Electronic Mail

RE: Seeking Community Feedback on Proposed Broadband Deployment Project

Dear Mr. Ellis:

My name is Bob Krier and I am the Community Engagement Manager at Nebraska Central Telephone Company (NCTC). NCTC provides telephone, cable, and internet services in the Comstock and Mason City telephone exchange areas, along with 19 other exchanges located throughout central Nebraska. In October of 2021, NCTC was acquired by Hamilton Telecommunications (Hamilton), a telecommunications provider based in Aurora. Hamilton is committed to finishing construction of a buried fiber broadband network capable of delivering ultra-fast internet speeds to every home in the service territory. The purpose of this letter is to inform you that NCTC intends to apply to the Nebraska Public Service Commission for a Capital Projects Fund grant to provide broadband internet service in your community. We are seeking feedback from impacted communities regarding the proposed project.

Please review the details of the proposed project below and provide feedback via the attached Community Feedback Form to the Public Service Commission **no later than April 24, 2023.**

If funded, the grant will be used to deploy buried fiber broadband to every serviceable location in Comstock and Mason City. The new fiber will be connected to NCTC's existing buried fiber network. The grant funding would alter NCTC's deployment timeline and help us complete this project faster.

As part of the grant process, NCTC is committed to offering an introductory 100/100 Mbps plan to all customers in the project area at \$65 for a period of at least five years. In addition, our proposed speed tiers and pricing for the first five years of the network (which are our current prices for the rest of our customers) are below. Although NCTC has traditionally tried to not raise prices year over year, we do reserve the right to raise the proposed pricing below by no more than 10% per year over that five year period.

Fiber to the Home Data Only Plans	Price per Month
75 Mbps Down x 25 Mbps Up	\$74.95
300 Mbps Down x 50 Mbps Up	\$89.90
1 Gig Down x 250 Mbps Up*	\$110.90

The Data Only fiber plans are available to our fiber customers and do not require a phone line or transport fee.

Fiber to the Home Plans for Hamilton Telephone Subscribers	Price per Month
50 Mbps Down x 25 Mbps Up	\$49.95
250 Mbps Down x 50 Mbps Up	\$64.95
1 Gig Down x 250 Mbps Up*	\$89.90

The proposed project area may also be viewed on the Nebraska Broadband Map, which will be made available on or around March 3, 2023 at <https://psc.nebraska.gov/telecommunications/nebraska-broadband-bridge-program-nbbp>.

If you have questions regarding the proposed project, you may contact me at (308)468-6341 or at bob.krier@hamiltontel.com. If you have questions regarding the Capital Projects Fund grant program, please e-mail psc.broadband@nebraska.gov or you may contact the Nebraska Public Service Commission Consumer Advocate during regular business hours (Monday-Friday, 8:00 a.m.-5:00 p.m. CT) by calling 402-471-3101 or toll free in Nebraska at 1-800-526-0017.

Sincerely,

Bob Krier

Bob Krier
Community Engagement Manager

Cc: Nebraska Public Service Commission psc.broadband@nebraska.gov