

**Nebraska Central Telephone Company
Rural Unserved With No Federal Support Noncontiguous Project Explanation
Attachment D**

The Nebraska Central Telephone Company (NCTC) service area covers a substantial swath of central Nebraska and includes portions of Adams, Blaine, Buffalo, Custer, Greeley, Hall, Holt, Howard, Garfield, Kearney, Loup, Rock, Sherman, and Wheeler counties. Although NCTC has already commenced construction of a fiber broadband network in its territory, there are still serviceable locations presently unserved by broadband, as that term is defined in the Broadband Bridge Act (the “Act”). The grant applications submitted by NCTC include almost every unserved location in the NCTC region. The unserved locations not included in NCTC’s grant applications are all in broadband deployment support (BDS) eligible census blocks and NCTC intends to build out fiber to those locations through that NUSF program. Utilizing the Act and BDS support, NCTC’s goal is to provide broadband speeds in excess of 100/100 Mbps to all unserved locations in the NCTC service area.

Although these unserved locations are in different NCTC exchanges, the locations in this application do have a natural connection. The noncontiguous locations in the application are all situated in NCTC exchanges and connected to the same fiber network owned by the same service provider. Those shared commonalities substantiate that they are naturally connected to each other and grouping them together in a grant application under the Act is intentional and logical from a business standpoint.

Proudly, NCTC has submitted Act applications with the objective of eliminating all the unserved locations in its service area; an objective which is also the top legislative priority of the Act. Completing this project will help supply the entire NCTC region with broadband capable of meeting the growing demands of consumers who need reliable internet for education, healthcare, work, communicating with loved ones, and entertainment.

The Public Service Commission (the “PSC”) should look favorably on the grouping of noncontiguous unserved locations in this application because the application is consistent with the top legislative priority of the Act, which is extending broadband service to unserved locations.

Because the objective of this application is to connect every unserved serviceable location in the NCTC service area to fiber and building fiber to unserved locations is the top

priority in the Act, the combination of serviceable locations from the same service area is judicious and consistent with the legislative intent of the Act.

In its *Order Issuing 2021-2022 Grant Application Schedule and Application Materials* (the “Order”) entered on August 10, 2021, the PSC expressed concern that broadband providers may submit applications under the Act that would build out some, but not all, of the unserved locations in a given area by “cherry-picking” favorable noncontiguous geographical locations in a single application. See *Order*, page 4. This would create winners and losers within the project and would further contribute to the digital divide. In that vein, it is logical that an applicant should have to explain the justification for any noncontiguous application submitted under the Act.

The noncontiguous serviceable locations in this application, when combined with NCTC’s BDS deployment plans and other unserved Act application, account for every unserved location in the NCTC service area and would address the areas of most crucial need there. The collective aim of NCTC’s Act applications is to complete fiber buildout to all unserved locations, not to “cherry-pick” some of the unserved locations that could be viewed as desirable. Ultimately, NCTC is serious about the challenge of building out the entire NCTC service area with fiber and a grant under the Act would greatly assist in that objective.

When completed, the noncontiguous unserved serviceable locations in this application will be connected to a singular fiber network built and maintained by NCTC.

NCTC’s goal of deploying fiber internet to every unserved serviceable location in the NCTC area is consistent with the objectives of the Act and the PSC should view this noncontiguous application favorably. NCTC understands that people in every part of its service area have the need for a fast and reliable broadband connection. Although the locations in this application are noncontiguous currently, when complete, the locations will all be connected to each other over NCTC’s fiber network. NCTC looks forward to completing this broadband project and using it to deploy sufficiently fast internet to all its customers for decades to come.