

**BEFORE THE  
NEBRASKA PUBLIC SERVICE COMMISSION**

In the Matter of the Nebraska Public                    )  
Service Commission, on its Own Motion,            )  
to Consider Appropriate                                )  
Modifications to the High-Cost Distribution        )  
and Reporting Mechanisms in its                    )  
Universal Service Fund Program in                 )  
Light of Federal and State                            )  
Infrastructure Grants                                    )

Application No. NUSF-139

**CHARTER FIBERLINK - NEBRASKA, LLC,  
AND TIME WARNER CABLE INFORMATION SERVICES (NEBRASKA), LLC  
IDENTIFICATION AND PRIORITIZATION OF  
PROPOSED ISSUES FOR MARCH 6, 2024 WORKSHOP**

Charter Fiberlink - Nebraska, LLC and Time Warner Cable Information Services (Nebraska), LLC (these entities and their affiliates, including corporate parent Charter Communications, Inc., collectively “Charter”) hereby respond to the Order Establishing Procedural Schedule and Setting Hearing, entered January 22, 2024 (“Scheduling Order”). The Scheduling Order requested that interested parties identify and prioritize issues for Commission consideration as well as for discussion in a workshop. Please find Charter’s proposed issues herein.

Charter appreciates the Commission’s deliberative approach to determine how best to move forward with the Nebraska Universal Service Fund (“NUSF”). The Commission captioned this docket as consideration of “appropriate modifications to the high-cost distribution and reporting mechanisms” in its USF program “in light of federal and state infrastructure grants.” Charter believes that considering the future of the NUSF program in light of those programs and the existing consumer marketplace is exactly what the Commission should be doing. With that in mind, Charter submits that the issues and sub-issues the Commission should consider and resolve

are as follows and that the same issues would be appropriate for discussion at the March 6, 2024 Workshop:

1. Rural Broadband Deployment: Will certain Nebraska locations continue to lack broadband once the federal Broadband Equity, Access, and Deployment (“BEAD”), American Rescue Plan Act (“ARPA”), Rural Digital Opportunity Fund (“RDOF”), Enhanced Alternative Connect America Cost Model (“Enhanced A-CAM”) and the Nebraska Broadband Bridge Program programs to expand rural broadband are fully implemented?
  - Is it possible and/or prudent to determine now whether and which Nebraska areas will remain without broadband after these programs are fully implemented or is it necessary to wait to understand and determine the state of rural broadband coverage resulting from these federal and state infrastructure grant programs?
2. Continuing Support: Will certain Nebraska locations require continuing support in order for citizens to have continuing access to broadband once deployment is completed and how will the Commission measure such need for continuing support?
  - When will the Commission be able to determine the need for continuing support?
  - What methodology should the Commission employ to determine such need? Are legacy tools such as jurisdictional separations and existing accounting rules appropriate for the broadband future? Which provider revenues should the Commission include in determining such need?
3. Funding Source: To the extent the Commission determines that certain Nebraska locations require support for broadband deployment and/or continuing support, what is the best funding source for these?

- Is the NUSF the most efficient and effective source of funding to address any such shortfalls or are there reasons it is not well-suited?

Thank you for your consideration of this proposed list of issues.

Dated: February 2, 2024

Charter Fiberlink - Nebraska, LLC and Time Warner  
Cable Information Services (Nebraska), LLC

By: /s/ Kevin M. Saltzman

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### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 2<sup>nd</sup> day of February, 2024, the above Identification and Prioritization of Proposed Issues for March 6, 2024 Workshop of Charter Fiberlink – Nebraska LLC and Time Warner Cable Information Services (Nebraska), LLC in Application No. NUSF-139 was delivered via electronic mail to the following:

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*/s/ Kevin M. Saltzman*

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