

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Nebraska) Docket No. NUSF-2/PO #12
Public Service Commission, on)
its own motion, seeking to establish)
guidelines for the administration)
of the Nebraska Telephone Assistance)
Program)

COMMENTS OF NE COLORADO CELLULAR, INC., DBA VIAERO WIRELESS

NE Colorado Cellular, Inc., dba Viaero Wireless (“Viaero”) respectfully submits the following comments in response to the Nebraska Public Service Commission’s (“Commission”) Order Seeking Comments on the administration of the Nebraska Telephone Assistance Program (“NTAP”), entered July 27, 2021, in the above-captioned docket.

As a participant in the Lifeline and NTAP programs, Viaero is proud to help all consumers access communication services and supports the Commission’s decision to review the NTAP. Generally, Viaero supports maintaining the current support. While the changes at the federal level are intended to transition to a world with less voice-only communication and more interactive broadband use, there are many Nebraskans on the back end of that transition, still preferring to make a voice call rather than send a text or electronic message.

The Nebraska Telecommunications Universal Service Fund Act¹, which includes provisions regarding the NTAP, references the Telecommunications Act of 1996 and Federal regulations as they existed on January 1, 2002, when support for voice-only service was the norm. Legislative changes to update and modernize this section would help the Commission better provide useful support to low-income consumers.

¹ Neb. Rev. Stat. 86-329 (2004).

At this time, Viaero supports continuation of the voice-only component of cost-reduction in the NTAP consistent with the Federal Communications Commission's ("FCC") Lifeline voice-only phasedown exemption. Where census blocks are identified with only one eligible telecommunications carrier ("ETC") providing Lifeline services, where the exemption applies, ETCs should continue to be reimbursed the \$5.25 for voice-only services. Viaero also believes the existing Lifeline National Eligibility Verifier is the best way to ensure an applicant's need is legitimate. Absent such national verifier, other state databases from the Department of Health and Human Services and Department of Labor could be accessed by state employees to ensure compliance. Viaero supports the Commission's work to reduce fraud and ensure accurate administration of the program funds in a way that does not overly burden the carriers. The current application form is thorough in its data gathering and allows for income eligibility to be accurate.

The Commission posits that lack of access to broadband may be a reason for not taking up the combined benefit. Alternatively, subscribers exist that are only interested in voice service, without broadband Internet connectivity, for a variety of reasons including lack of digital adoption or non-interest. While Viaero declines to assume the reasons for which consumers choose voice only service, where that decision is made, the NTAP should continue to extend universal support to low-income consumers.

In conclusion, Viaero supports continuation of a voice-only subsidy where allowed under federal and state law. Viaero supports an eligibility verification mechanism, similar to what is currently used, that is streamlined for the ETC to provide service with minimal administrative burden. Viaero supports a supplement to the subsidy to ensure maintenance of the current \$5.25

amount. Viaero looks forward to continuing its work with the Commission on providing service to Nebraskans in need.

Dated: September 14, 2021

NE COLORADO CELLULAR, INC.
d/b/a VIAERO WIRELESS

By: 

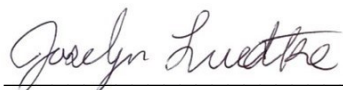
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 14th day of September, 2021, an original and an electronic copy of NE Colorado Cellular, Inc., d/b/a Viaero Wireless's comments were delivered to:

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