

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Nebraska Public)
Service Commission, on its own motion,) Application No. NUSF-100 / PI-193
to consider revisions to the universal)
service fund contribution methodology.)

POST-HEARING REPLY COMMENTS OF COX NEBRASKA TELCOM, LLC

Cox Nebraska Telcom, LLC hereby files these Reply Comments in the above-captioned docket, as permitted by the Hearing Officer Order entered herein on September 18, 2017.

Cox submits these comments to respond to representations made by the Rural Independent Companies (“the RIC”) in their Closing Comments, filed September 15, 2017. Specifically, RIC asserts Cox does not oppose adoption of the connections-based contribution mechanism, citing the testimony of Mr. Rob Logsdon delivered at the hearing held August 30, 2017.¹

This is not true. Below, Cox cites verbatim the testimony that was delivered by Mr. Logsdon that RIC refers to:

First, Cox continues to believe it is premature to adopt a connections-based contribution methodology because any changes may be short lived if the FCC enacts FUSF contribution methodology reform. However, if the commission decides to proceed, we urge the new methodology to be as simple as possible to implement in order to minimize the accompanying costs that will be incurred.²

The first point of Mr. Logsdon’s testimony was Cox’s reluctance and concern with the Commission implementing a connections-based methodology independently, without the benefit of federal guidance. Cox then goes on to offer its input should the Commission proceed with a new methodology despite Cox’s aforementioned concerns.

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¹ NUSF-100/ PI-193, Closing Comments of Rural Independent Companies, filed Sept. 15, 2017, pg. 6.

² NUSF-100/ PI-193 Hearing Aug. 30, 2017; Testimony of Rob Logsdon on behalf of Cox Nebraska Telcom, LLC, TR at 52, lines 10-18..

Nebraska
Public Service Commission

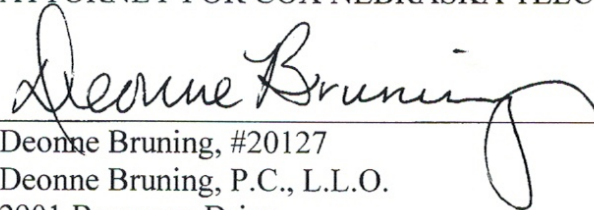
This position is consistent with the Post-Hearing Comments filed by Cox herein on September 15, 2017. Cox stated in those comments:

As an initial matter, by responding herein, Cox does not change or deviate from the position previously conveyed through filed comments and pre-filed testimony that it is ill-advised for the Commission to proceed independently, prior to the Federal Communications Commission (the "FCC") taking action on this subject.³

While Cox has and continues to encourage the Commission to make this change be as simple as possible, it does not negate or lessen Cox's concern with Nebraska experimenting with the implementation of a new and untested methodology.

Respectfully submitted this 26th of September, 2017.

ATTORNEY FOR COX NEBRASKA TELCOM, LLC

A handwritten signature in black ink, reading "Deonne Bruning", is written over a horizontal line. The signature is fluid and cursive, with a large loop at the end.

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³ NUSF-100 / PI-193 Post Hearing Comments of Cox Nebraska Telcom, LLC, filed Sept. 15, 2017, pg. 1.

Certificate of Service

The undersigned hereby certifies that on this 26th day of September, 2017 an original and five copies of Cox Nebraska Telcom, LLC's Post-Hearing Reply Comments in Application NUSF-100, PI-193 were hand-delivered to the Nebraska Public Service Commission, and a copy of the same was e-mailed to:

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