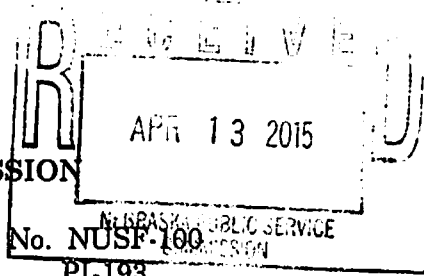


BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION



In the Matter of the Nebraska Public Service Commission, on its own motion, to consider revisions to the universal service fund contribution methodology.

Application No. NUSF-100 PI-193

COPY

REPLY COMMENTS OF THE RURAL TELECOMMUNICATIONS COALITION OF NEBRASKA

The Rural Telecommunications Coalition of Nebraska ("RTCN"),<sup>1</sup> by and through its attorneys of record, hereby respectfully submits these reply comments to the Nebraska Public Service Commission ("Commission") in response to comments filed by various interested parties on or about February 13, 2015, in Application No. NUSF-100, PI-193.<sup>2</sup>

The Commission opened this proceeding to consider revisions to the contribution mechanism of the Nebraska Universal Service Fund ("NUSF") in order to address the steady decline of NUSF surcharge collections over the past several years that has resulted from a diminishing base of NUSF contributors.<sup>3</sup> Several interested parties filed initial comments in response to the Commission's Order.<sup>4</sup> The comments covered a broad array of issues and in many instances provided helpful insight and raised important questions for further consideration.

Contrary to comments suggesting that the Commission should suspend this docket pending action by the Federal-State Joint Board on Universal Service and/or the Federal Communications Commission, RTCN encourages the Commission to steadily press forward to

<sup>1</sup> For purposes of this proceeding, RTCN is made up of the following carriers: Arapahoe Telephone Company d/b/a ATC Communications, Benkelman Telephone Company, Inc., Cozad Telephone Company, Diller Telephone Company, Glenwood Network Services, Inc., The Glenwood Telephone Membership Corporation, Hartman Telephone Exchanges, Inc., Hemingford Cooperative Telephone Co., Mainstay Communications, Plainview Telephone Company, Southeast Nebraska Communications, Inc., Wauneta Telephone Company, and WesTel Systems f/k/a Hooper Telephone Company.

<sup>2</sup> *In the Matter of the Nebraska Public Service Commission, on its own motion, to consider revisions to the universal service fund contribution methodology*, Application No. NUSF-100, PI-193, Order Opening Docket and Seeking Comment (November 13, 2014) (the "Order").

<sup>3</sup> *Id.* at 1.

<sup>4</sup> Initial comments were filed by the Nebraska Rural Independent Companies, Qwest Corporation d/b/a CenturyLink QC and United Telephone Company of the West d/b/a CenturyLink, Windstream Nebraska, Inc., Cox Nebraska Telcom, LLC, CTIA-Wireless Association, Charter Fiberlink - Nebraska, LLC, the Association of Teleservices International, Inc., and RTCN.

further explore how to best formulate a NUSF contribution methodology that meets the Commission's objectives and fits within the parameters of the Nebraska Telecommunications Universal Service Fund Act. RTCN further encourages the Commission to proceed cautiously, thoroughly examining the relevant issues and minimizing the risk of unintended consequences that may result from the implementation of NUSF contribution reform. To that end RTCN suggests that, following its consideration of the comments and reply comments that have been submitted, the Commission should then further focus the issues for additional investigation, comments and/or dialogue with interested parties.


As stated in its initial comments, RTCN continues to support the Commission's overall objective in this proceeding and appreciates the opportunity to comment.

Dated this 13th day of April, 2015.

RURAL TELECOMMUNICATIONS COALITION  
OF NEBRASKA ("RTCN")

ATC Communications,  
Benkelman Telephone Company, Inc.,  
Cozad Telephone Company,  
Diller Telephone Company,  
Glenwood Network Services, Inc.  
The Glenwood Telephone Membership Corporation,  
Hartman Telephone Exchanges, Inc.,  
Hemingford Cooperative Telephone Co.,  
Mainstay Communications,  
Plainview Telephone Company,  
Southeast Nebraska Communications, Inc.,  
Wauneta Telephone Company, and  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that an original and one copy of the foregoing Reply Comments of the Rural Telecommunications Coalition of Nebraska were filed with the Public Service Commission on April 13, 2015, and a copy was served via electronic mail on April 13, 2015, addressed as shown below, to the following:

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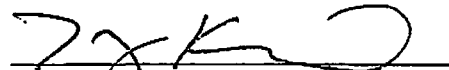
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