BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Nebraska Public Service Commission, on its own Motion, to make adjustments to its high-cost distribution mechanism and make revisions to its reporting requirements.

Application No. NUSF-108

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COMMENTS OF THE
RURAL TELECOMMUNICATIONS COALITION OF NEBRASKA

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I. INTRODUCTION

The Rural Telecommunications Coalition of Nebraska ("RTCN"). by and through its attorneys of record, hereby respectfully submits these comments to the Nebraska Public Service Commission ("Commission") in response to the Commission's September 27, 2016, Order Opening Docket and Seeking Comments in Application No. NUSF-108 ("Order").

II. COMMENTS

The Commission's Order opening this investigatory docket purports to consider modifications to the distribution and reporting processes for price cap carriers. All members of the RTCN are rate-of-return carriers, and will not be directly impacted by findings and decisions made in the present proceeding. That said, some of the statements in the Order appear to have possible implications for rate-of-return carriers. The RTCN urges separate consideration by the Commission of any modifications in high-cost support distribution and reporting requirements particular to rate-of-return carriers in order to ensure fair and just treatment of such carriers and their customers, as well as to protect the due process rights of rate-of-return carriers. Findings and decisions made in the present proceeding are applicable.

proceeding should not be considered by the Commission as precedential and should carry only so much weight in future proceedings as the relative facts and circumstances in the proceedings merit, in accordance with all laws establishing the Commission’s jurisdiction, as well as the due process rights of the carriers. With that in mind, the RTCN expressly reserves the right to comment further in this proceeding and future proceedings that may directly address high cost distribution and reporting requirements pertaining to rate-of-return carriers.

Dated this 27th day of October 2016.
RURAL TELECOMMUNICATIONS
COALITION OF NEBRASKA

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,
Pierce Telephone Co., Inc. Plainview
Telephone Company,
Southeast Nebraska Communications, Inc.,
Wauneta Telephone Company, and
WesTel Systems.

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By: ___________________________
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that an original and five copies of the foregoing
Comments of the Rural Telecommunications Coalition of Nebraska were filed with
the Public Service Commission on October 31, 2016, and a copy was served via electronic
mail on October 31, 2016, addressed as shown below, to the following:

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Nebraska Public Service Commission
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Andrew S. Pollock