

**BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION**

In the Matter of the Nebraska Public Service ) Application No. NUSF-111/PI-211  
Commission, on its own motion, to determine )  
rate design and address implementation )  
issues with a connections-based contribution )  
mechanism.

**POST-HEARING COMMENTS OF  
ASSOCIATION OF TELESERVICES INTERNATIONAL, INC.**

THE ASSOCIATION OF TELESERVICES INTERNATIONAL, INC. (ATSI), by its attorneys, respectfully submits its comments to the Nebraska Public Service Commission in response to the hearing on May 1, 2018, held by the Commission in the captioned proceeding. As its post-hearing comments, ATSI respectfully states:


The hearing clearly demonstrated the emerging consensus among the parties that business customers, such as ATSI members, should continue to be assessed on a percentage of revenues basis for contributions to the Nebraska Universal Service Fund (NUSF), rather than assessed on a per-connection basis. Notably, the Rural Independent Companies (RIC) testified that it “has since 2016 explored other options in good faith for assessing business telecommunications services, but after considering the pros and cons . . . , we have concluded that business services should be continue to be based on revenues.” (Hearing Tr. 28, lines14-20) (Witness Pfister). Witness Pfister went on to outline six reasons why business telecommunications services should continue to be assessed on revenues for NUSF purposes. (Hearing Tr. 28, line 21 – 30, line 14).

RIC thus concurs with the position explicitly adopted by Charter and Cox in their reply comments herein on March 23, 2018;<sup>1</sup> and both Charter and Cox affirmed this position at the hearing. (Hearing Tr. 52, line 22 – 53, line 1) (Witness Gillan on behalf of Charter); (Hearing Tr. 61, lines 6-8, 18-22) (Witness Logsdon on behalf of Cox). CTIA also concurred, although it would retain a revenues-based contribution methodology across the board (Hearing Tr. 72, lines 12-25) (Witness Brooks); and Windstream acknowledged that retaining the current revenues methodology for business customers is workable. (Hearing Tr. 14, lines 18-22) (Witness Kreutz).

ATSI agrees that maintaining the current revenues contribution methodology for business telecommunications customers would be a sensible solution to the numerous unresolved problems inherent in adopting a connections methodology across the board. Accordingly, ATSI joins with the other parties in requesting that the status quo be maintained for its members and other business telecommunications users.

Respectfully submitted,

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<sup>1</sup> Reply Comments by Charter Fiberlink – Nebraska, LLC and Time Warner Cable Information Services (Nebraska), LLC, March 23, 2018, e.g., p. 6; Reply Comments of Cox Nebraska Telecom, LLC, March 23, 2018, e.g., p. 4.

**Certificate of Service**

The undersigned hereby certifies that on this 18<sup>th</sup> day of May, 2018 an original and five copies of the Response to Request for Information in Application NUSF-111/PI-211 were delivered by overnight mail to the Nebraska Public Service Commission, and a copy of the same was mailed or e-mailed to the following:

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