

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

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

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REPLY COMMENTS OF THE
RURAL TELECOMMUNICATIONS COALITION OF NEBRASKA

Nebraska
Public Service Commission

On December 19, 2017, the Nebraska Public Service Commission ("Commission") released an Order Opening Docket and Seeking Comment ("Order"), commencing proceeding on its own motion to begin the next phase of contribution reform. In that order, the Commission seeks comments on rate design and implementation issues with connections-based contribution mechanism with initial comments due on January 30, 2018. After reviewing initial comments, Hearing Officer Frank Landis found that reply comments may be useful. Originally, the deadline for reply comments was March 16, 2018. In an order entered February 23, 2018, the Commission extended that deadline to March 23, 2018. The Rural Telecommunications Coalition of Nebraska ("RTCN")<sup>1</sup> submits these reply comments in response to the Order ("Comments").

The RTCN appreciates the Commission's diligence in moving forward with contributions reform. Reform is critical to stabilizing the Nebraska Universal Service Fund ("NUSF"), which, in turn, is critical to ensuring "[q]uality telecommunications and

<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., Cambridge Telephone Company 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 f/k/a Hooper Telephone Company.

information services [are] available at just, reasonable, and affordable rates...in all regions of the state.<sup>2</sup> The RTCN submitted comments in NUSF-100 addressing many of the issues raised in the Order. At this time, the RTCN will not restate those comments, but reserves its rights to present them, supplement them, and offer testimony and evidence as the Commission progresses with this proceeding. The RTCN encourages the Commission to move forward with this proceeding expeditiously and be mindful of its statutory obligation to ensure that “[a]ll providers of telecommunications should make an equitable and nondiscriminatory contribution to the preservation and advancement of universal service.”<sup>3</sup>

**Dated: March 23, 2018.**

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<sup>2</sup> Neb. Rev. Stat. § 86-323(1) – (3).

<sup>3</sup> Neb. Rev. Stat. § 86-323(4).

RURAL TELECOMMUNICATIONS  
COALITION OF NEBRASKA

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that an original and five copies of the foregoing *Reply Comments of the Rural Telecommunications Coalition of Nebraska* were filed with the Public Service Commission on March 23, 2018, and a copy was served via electronic mail, to the following:

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