

January 29, 2018

VIA OVERNIGHT DELIVERY

Nebraska Public Service Commission
300 The Atrium
1200 N Street
Lincoln, Nebraska 68509

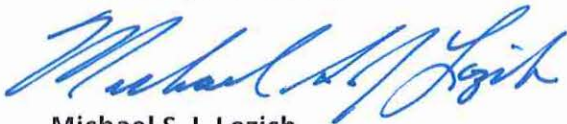
Re: In the Matter of the Nebraska Public Service Commission, on its own motion,
to determine a rate design and address implementation issues with a
connections-based contribution mechanism.
Application No. NUSF-111/PI-211

Dear Commissioners,

Enclosed for filing are one original and five (5) copies of Comments from Securus Technologies, Inc. ("Securus") in response to the Nebraska Public Service Commission Order Opening Docket and Seeking Comment dated December 19, 2017 under Application No. NUSF-111/PI-211.

Securus sincerely appreciates your attention to this matter. Please acknowledge receipt of this filing by date stamping the enclosed additional copy of this cover letter and returning it in the self-addressed stamped envelope provided. Should you have any questions or comments regarding this filing, please contact the undersigned at (972) 277-0565 or mlozich@securustechnologies.com. You may also contact Debbie Conde, Sr. Regulatory Analyst at (972) 277-0395 or dconde@securustechnologies.com.

Respectfully submitted,



Michael S. J. Lozich

Sr. Corporate Counsel & Director of Regulatory and Governmental Affairs

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

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

COMMENTS OF SECURUS TECHNOLOGIES, INC.

Securus Technologies, Inc. (“Securus”) hereby submits its comments to the Nebraska Public Service Commission (the “Commission”) Opinion and Findings entered December 19, 2017, opening a proceeding to determine an appropriate Nebraska Universal Service Fund (“NUSF”) rate design for a connections-based contribution mechanism and address implementation issues associated with changing the contribution methodology.

In October 2017, the Commission adopted a connections-based methodology to fund the NUSF going forward. Once effective, the new system will apply to both residential and business lines and include wireline, wireless, and VoIP connections. It will not include broadband (BIAS) service connections. The assessment will be in the form of a flat rate assessed on each wired line or wireless channel used to provide end users with access to any connection to other networks, including mobile voice service and residential and business fixed voice service (wireline and VoIP). The Commission’s new proceeding initiated to study rate design and implementation issues asks a series of questions on the issues of rate design, data sources, and implementation. Securus is a contributing provider to the NUSF and offers the following comments to explain why our company cannot apply a connections-based contribution mechanism.

Securus is an Institutional Operator Service provider and as such, does not have dedicated wired lines or wireless channels to provide end users with access to assessable services.

Securus’ services are limited to providing institutional operator services in correctional

institutions, using Internet protocol-enabled transport facilities, which only have Internet access data connections at the correctional facilities. There are no dedicated local exchange access lines or individual dedicated Internet connections for end users, and neither inmates nor the parties receiving calls from inmates subscribe to access lines from Securus. Securus' inmate calling services are provided and billed on a call-by-call basis, as with most other operator services.

For the above stated reasons, Securus does not have the ability to determine or charge the NUSF applying a connections-based methodology. Securus is able to apply the USF on the current NUSF revenue-based assessment. As explained above, Securus charges for its service on a "per call" basis. Securus does not provide access lines nor does it charge customers on an access line or connection basis. Securus respectfully requests the Commission either (a) provide an alternative method of applying the NUSF for those companies that do not provide services on a connection or access line basis, or (b) exempt those companies from accessing and paying into the NUSF.

Dated January 30, 2018

Respectfully submitted,



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