

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Nebraska Public Service Commission, on its own Motion, to determine contribution requirements relative to prepaid wireless providers.) Application No. NUSF-113/PI-220

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Nebraska Public Service Commission

COMMENTS OF THE RURAL TELECOMMUNICATIONS COALITION OF NEBRASKA

On August 28, 2018, the Nebraska Public Service Commission ("Commission") released an Order Opening Docket and Seeking Comment ("Order"), commencing this proceeding on its own motion to consider the requirements for prepaid wireless carriers for making contributions to the Nebraska Universal Service Fund ("NUSF") following the enactment of LB 157 (2018). The Rural Telecommunications Coalition of Nebraska ("RTCN")¹ submits these reply comments in response to the Order ("Comments").

The RTCN appreciates the Commission's continued diligence in advancing contributions reform. Reform is critical to stabilizing the Nebraska Universal Service Fund ("NUSF"), which, in turn, is critical to ensuring "[q]uality telecommunications and information services [are] available at just, reasonable, and affordable rates...in all regions of the state."² The RTCN encourages the Commission to move forward with this proceeding and be mindful of its statutory obligation to ensure that "[a]ll providers of telecommunications should make an equitable and nondiscriminatory contribution to the

¹ 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., 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.

² Neb. Rev. Stat. § 86-323(1) – (3).

preservation and advancement of universal service.”³ The requirements for contributions by prepaid wireless providers should comport with this statutory responsibility.

The RTCN reserves its rights to supplement its comments and offer testimony and evidence as the Commission progresses with this proceeding.


Dated: October 1, 2018.

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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³ Neb. Rev. Stat. § 86-323(4).

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 1, 2018, and a copy was served via electronic mail, to the following:

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