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

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") 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." 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

---


preservation and advancement of universal service." 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


By: REMBOLT LUDTKE LLP
3 Landmark Centre
1128 Lincoln Mall, Suite 300
Lincoln, NE 68508
(402) 475-5100
apollock@remboltlawfirm.com
tkirk@remboltlawfirm.com

By: Andrew S. Pollock (#19872)
Troy S. Kirk (#22589)

---

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:

Cullen Robbins
Cullen.robbins@nebraska.gov

Brandy Zierott
Brandy.zierott@nebraska.gov

Andrew S. Pollock