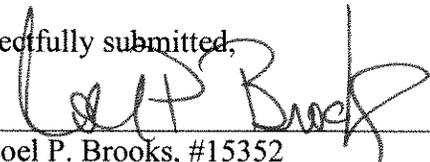




commenters for CTIA's position, with no expressed opposition.<sup>4</sup> The Commission should maintain the current definition to promote certainty and eliminate the possibility that a new, different definition leads to competitive imbalance.

Finally, CTIA notes that many commenters either outright opposed a move to a connections-based mechanism for business and government access lines,<sup>5</sup> or even if they supported it, felt it was too soon to make a change.<sup>6</sup> While CTIA opposed capping the number of connections, should the Commission adopt such a mechanism,<sup>7</sup> the consensus in these comments suggests that moving to a connections-based mechanism for business and government access lines would be unwise at this time.

Respectfully submitted,

By: 

Loel P. Brooks, #15352  
Brooks, Pansing Brooks, PC, LLO  
1248 O Street, Suite 984  
Lincoln, NE 68508  
(402) 476-3300  
[lbrooks@brookspanlaw.com](mailto:lbrooks@brookspanlaw.com)

and

Matthew DeTura  
Benjamin Aron  
**CTIA**  
1400 16th Street NW  
Suite 600

---

<sup>4</sup> See AT&T's Comments at 1, Comments of Qwest Corporation d/b/a CenturyLink QC and United Telephone Company of the West d/b/a CenturyLink, Application No. NUSF-119 / PI-233 (Aug. 31, 2020) ("CenturyLink Comments") at 3.

<sup>5</sup> See AT&T's Comments at 2-5, Comments of Citizens Telecommunications Company of Nebraska d/b/a Frontier Communications of Nebraska, Application No. NUSF-119 / PI-233 (Aug. 31, 2020) at 1-3, Joint Comments of Cox Nebraska Telcom, LLC, Charter Fiberlink – Nebraska, LLC, and Time Warner Cable Information Services (Nebraska), LLC, Application No. NUSF-119 / PI-233 (Aug. 31, 2020) at 1-6.

<sup>6</sup> See CenturyLink Comments at 2, Comments of Windstream, Application No. NUSF-119 / PI-233 (Aug. 31, 2020) at 1-4. Securus also described its technical inability to comply with a connections-based surcharge. See Comments of Securus Technologies, Application No. NUSF-119 / PI-233 (Aug. 31, 2020).

<sup>7</sup> See CTIA Comments at 5.

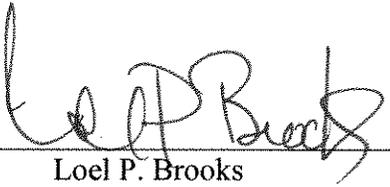
Washington, D.C. 20036  
(202) 736-3683

September 30, 2020

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 30th day of September, 2020, one original, five copies, and one electronic copy of the Comments of CTIA – The Wireless Association in Application No. NUSF-119/PI-233 were mailed to the Nebraska Public Service Commission, 1200 N Street, Suite 300, Lincoln NE and a copy of the same has been e-mailed to the following:

psc.nusf-filings@nebraska.gov



---

Loel P. Brooks

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 30th day of September, 2020, an copy of the Comments of CTIA – The Wireless Association in Application No. NUSF-119/PI-233 was sent to the following:

<b>AT&amp;T Corp., Teleport Communications America, LLC, and New Cingular Wireless PCS, LLC d/b/a AT&amp;T Mobility</b>  Bruce A. Ney Bruce.ney@att.com	<b>Rural Telecommunications Coalition of NE</b>  Andy Pollock Rembolt Ludtke, LLP apollock@remboldtlawfirm.com
<b>Frontier Communications</b>  Scott Bohler Scott.bohler@ftr.com	<b>Securus Technologies, LLC</b>  Michael S.J. Lozich mlozich@securustechnologies.com
<b>Qwest Corporation d/b/a CenturyLink QC and United Telephone Company of the West d/b/a CenturyLink</b>  Elizabeth A. Culhane Fraser Stryker PC, LLO eculhane@fraserstryker.com  Brook Villa Brook.villa@centurylink.com	<b>Windstream Nebraska, Inc.</b>  Blake Johnson Mary Jacobson Bruning Law Group blake@bruninglawgroup.com mary@bruninglawgroup.com  Brad Hedrick Trent Fellers brad.hedrick@windstream.com trent.fellers@windstream.com
<b>Nebraska Rural Independent Companies</b>  Paul Schudel Thomas Moorman Woods & Aitken, LLP pschudel@woodsaitken.com tmoorman@woodsaitken.com	<b>Cox Nebraska Telecom, LLC Charter Fiberlink-Nebraska, LLC and Time Warner Cable Information Services (Nebraska), LLC</b>  Deonne Bruning Deonne Bruning, P.C., L.L.O deonnebruning@neb.rr.com

  
\_\_\_\_\_  
Loel P. Brooks