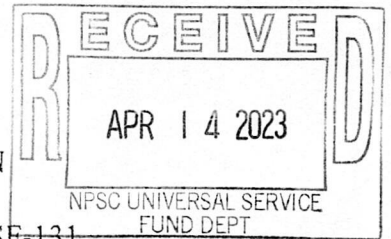


Before the
NEBRASKA PUBLIC SERVICE COMMISSION



In the Matter of the Nebraska Public Service) Application No. NUSF-131
Commission, on its own motion, to establish) Progression Order No. 1
reverse auction procedures and requirements.)

COMMENTS OF CTIA

CTIA¹ respectfully submits the following comments in response to the Nebraska Public Service Commission's ("Commission's") Order Seeking Comment ("Order"), entered March 14, 2023 in the above-captioned docket, regarding the Commission's Reverse Auction Rules and Regulations for the Nebraska Universal Service Fund ("NUSF").

Although the Commission's reverse auction is a viable avenue for companies to receive important and limited NUSF resources, the Order noted that only one bid was received in the 2022 auction, leading the Commission to seek comment on ways to encourage participation in the program.

One significant way the Commission can encourage participation is by broadening its eligible technologies to include fixed wireless solutions, as the Order inquires about in Question 4. Wireless broadband serves a crucial role in meeting Nebraska's broadband needs, with 5G fixed wireless access, in particular, providing speeds that meet and exceed consumers' broadband needs. As Wells Fargo analysts noted, "5G home broadband ... should offer a compelling solution in more rural markets ... in particular."² Goldman Sachs agrees, finding that

¹ CTIA – The Wireless Association ("CTIA") (www.ctia.org) represents the U.S. wireless communications industry and the companies throughout the mobile ecosystem that enable Americans to lead a 21st century connected life. The association's members include wireless carriers, device manufacturers, and suppliers as well as app and content companies. CTIA vigorously advocates at all levels of government for policies that foster continued wireless innovation and investment. The association also coordinates the industry's voluntary best practices, hosts educational events that promote the wireless industry and co-produces the industry's leading wireless tradeshow. CTIA was founded in 1984 and is based in Washington, D.C.

² See CTIA, "5G for Home Broadband—the Next 5G Breakthrough" (May 27, 2021), available at <https://api.ctia.org/wp-content/uploads/2021/05/5G-Home-One-pager-x.pdf> at 1-2 (last accessed Apr. 14, 2023).

wireless providers “will have some near- to medium-term success with their 5G fixed wireless access (FWA) offerings in under-served areas.”³ And Accenture “estimates the wireless providers’ 5G [fixed wireless access] deployment could serve up to nearly half of American’s rural households, with at least one new 5G [fixed wireless access] provider serving each of those communities.”⁴

With streamlined deployments and lowered costs-to-serve, 5G home broadband services represent a transformative broadband alternative that can be deployed quickly and with superior economics and network efficiencies. Consumers have demonstrated a clear preference for fixed wireless access. FWA subscriptions outpaced cable broadband subscriptions in 2022, accounting for 90% of net broadband subscription additions in the U.S. in the past year, accompanied by high consumer satisfaction ratings.⁵ Moreover, fixed wireless access buildouts will benefit surrounding areas by expanding voice coverage and providing higher speeds for mobile users.

Beyond expanding the program to allow for fixed wireless access participation, the Commission should also review the program to determine whether it can minimize any other barriers to participation. It is possible that the specific legislative mandates governing the program, such as the need to distribute funding via reverse auction and the symmetrical speed requirements for funding, may be what is discouraging participation. However, because the Commission must work within those confines, it should take this opportunity to streamline its

(“5G home broadband” and “fixed wireless access” are alternate terms describing the same home broadband service offered over 5G wireless networks).

³ See *id.* at 2.

⁴ See Accenture (commissioned by CTIA), “5G Fixed Wireless Broadband: Helping Close the Digital Divide in Rural America” (Nov. 15, 2021), available at <https://api.ctia.org/wp-content/uploads/2021/11/CTIA-Rural-HHs-mini-POV-V2-20211115.pdf> at 5 (last accessed Apr. 14, 2023).

⁵ See, e.g., Dano, Mike, “FWA captures 90% of all new US customers, pleasing around 90% of them,” LightReading (Mar. 6, 2023), available at [https://www.lightreading.com/broadband/5g-fixed-wireless-access-\(fwa\)/fwa-captures-90-of-all-new-us-customers-pleasing-around-90-of-them/d/d-id/783658](https://www.lightreading.com/broadband/5g-fixed-wireless-access-(fwa)/fwa-captures-90-of-all-new-us-customers-pleasing-around-90-of-them/d/d-id/783658) (last accessed Apr. 14, 2023).

own regulations for the program wherever possible and ensure that it does not unnecessarily exclude qualified providers from bidding in reverse auction for NUSF funding.

Respectfully submitted,

By: 

Loel P. Brooks, #15352
Brooks, Pansing Brooks, PC, LLO
1314 O Street, Suite 104
Lincoln, NE 68508
(402) 476-3300
lbrooks@brookspanlaw.com

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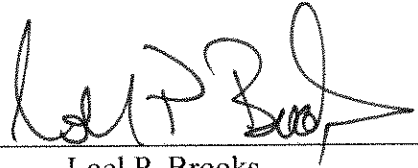
Matthew DeTura
Benjamin Aron
Matthew DeTura
CTIA
1400 16th Street NW
Suite 600
Washington, D.C. 20036
(202) 736-3683
BAron@ctia.org
MDeTura@ctia.org

April 14, 2023

CERTIFICATE OF SERVICE

I certify that on the 14th day of April, 2023, an electronic copy of the foregoing Comments on behalf of CTIA-The Wireless Association, in Docket No. NUSF-131, Progression Order 1, were electronically delivered to the Nebraska Public Service Commission to the following:

psc.nusf@nebraska.gov



Loel P. Brooks