

**Before the
NEBRASKA PUBLIC SERVICE COMMISSION**

In the Matter of the Nebraska Public Service)
Commission, on its own motion, to consider)
appropriate modifications to the high-cost) Application No. NUSF-139
distribution and reporting mechanisms in its)
Universal Service Fund program in light of)
federal and state infrastructure grants.)

CTIA’S PROPOSED WORKSHOP ISSUES FOR DISCUSSION

CTIA respectfully submits the following response to the Nebraska Public Service Commission’s (“Commission’s”) January 29, 2024 Procedural Order and Order Setting Hearing in the present proceeding (“Order”). In the Order, the Commission asks parties to identify and prioritize issues for Commission consideration as it relates to the Nebraska Universal Service Fund (“NUSF”) and recommend issues for discussion at the upcoming workshop.¹

As CTIA emphasized in earlier comments in this proceeding² and throughout its advocacy before the Commission regarding NUSF reform, any changes to the NUSF should minimize the impact on consumers, continue to prioritize technological neutrality, and ensure the NUSF does not distort competition.

To that end, CTIA recommends that the Commission set a goal to transition NUSF funding away from legacy network support and towards focusing entirely on broadband, to the extent additional support for broadband in Nebraska is needed. Continuing to support legacy networks is an inefficient use of NUSF funding. It distorts competition and increases the financial burden on consumers, especially as the costs to prolong the life of these networks require increasingly more money from the same consumers that have abandoned them.

¹ Order at 1-2.

² Initial Comments of CTIA, Application No. NUSF-139 (Sept. 29, 2023) at 1.

The initial workshop in this holistic investigation of the NUSF is an appropriate time for broad, long-term goal setting. CTIA suggests that the upcoming workshop first addresses the following issues:

- A discussion of what steps would be needed to eliminate legacy support for copper networks, be they regulatory or legislative; and
- Determination of a target date for such elimination, with an appropriate transition or draw-down period to give companies drawing such support time to adjust their business models.

The workshop should then address a ten-year vision for the future of the NUSF consistent with the principles CTIA laid out above. Such discussion should consider:

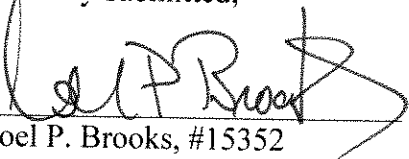
- After copper networks are retired, should the NUSF be eliminated, or maintained to support broadband?
- Assuming broadband support is desired (or required by the Legislature), what is the best way to ensure that funding is not duplicated, is targeted only to areas where there is no unsubsidized competition, and is not provided to carriers that have made commitments to serve that were not made conditional on receipt of NUSF support?
- In particular, the Commission should focus on what the NUSF should look like once BEAD projects have been completed, as this will have a significant impact on what state broadband support is needed. For instance, should NUSF funding be used for buildout of networks, to the extent they are still necessary to meet universal service goals, or only for support of broadband networks in areas without unsubsidized competitors?

By establishing its end goals for the NUSF right from the start of this proceeding, the Commission will be able to use the remainder of this proceeding (and any subsequent proceeding) to implement concrete steps to work towards specific targets, rather than nebulous concepts, for improving the fund.

CTIA appreciates the Commission's decision to take a comprehensive look at issues surrounding the Nebraska USF and looks forward to working with the Commission and stakeholders toward developing a set of goals and objectives for universal service in Nebraska as this proceeding continues.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 2nd day of February, 2024, one electronic copy of CTIA's Proposed Workshop Issues for Discussion in Docket No. NUSF-139 were emailed to the following:

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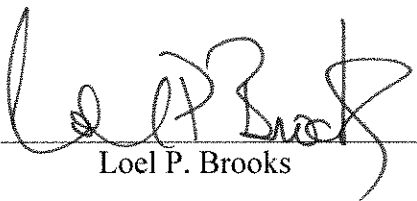
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