

**BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION**

In the Matter of the Nebraska Public Service Commission, on its own Motion, seeking to establish guidelines for the administration of the Nebraska Telephone Assistance Program

Application No. NUSF-2  
Progression Order No. 11

**COMMENTS OF QWEST CORPORATION d/b/a/ CENTURYLINK QC  
AND UNITED TELEPHONE COMPANY OF THE WEST d/b/a CENTURYLINK**

The Nebraska Public Service Commission ("Commission") issued the above-referenced Progression Order seeking comments regarding the changes that need to be made to the eligibility requirements for the Nebraska Telephone Assistance Program ("NTAP") in light of the Lifeline and Link Up reforms made by the Federal Communications Commission ("FCC"). Qwest Corporation d/b/a CenturyLink QC and United Telephone Company of the West d/b/a CenturyLink (collectively, "CenturyLink") respectfully provide these comments in response to the Commission's request.

In general, CenturyLink recommends the Commission follow the FCC's rules. Doing so will establish uniformity and consistency between the two programs and lessen customer confusion and alleviate administrative burdens on both the Commission and NTAP providers.

**1. Should the Commission distinguish between ETCs designated by the PSC versus ETCs designated by the FCC?**

Under the FCC's Order, the FCC will designate the ETC. The Commission should recognize the ETCs designated by the FCC.

**2. How would any distinction impact consumers?**

There should be no distinctions should the Commission choose to follow the FCC.

**3. How will the Commission determine whether voice or broadband services be provided to the subscriber?**

The reports provided by the carriers to the Lifeline administrator, in this case the Commission, will include the information the Commission needs to determine the services being provided to the subscriber.

4. Given the decision in the Third Report and Order to preempt states from designating ETCs seeking Lifeline support for broadband service, should the Commission continue to determine eligibility of the Lifeline subscribers in the same manner?

CenturyLink recommends the Commission mirror the FCC's rules for eligibility.

5. Should the Commission continue to oversee the recertification process for ETCs designated by the FCC?

CenturyLink recommends the Commission continue to oversee the recertification process for ETCs designated by the FCC until the national verifier is in place.

6. Does the Commission need to change the manner in which subscribers are de-enrolled from the program? If so, how?

No.

As for the issue of educating consumers of the changes to the Lifeline program, CenturyLink plans on doing some education through a letter to its Lifeline subscribers. However, the Commission should undertake some education for the general public.

Dated this 8th day of November, 2016.

Respectfully submitted,

By: 

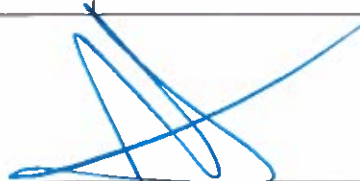
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 8<sup>th</sup> day of November, 2016, a true and correct copy of the foregoing was delivered to the following as indicated below:

<p>Via email and hand-delivery: Brandy Zierott and Sue Vanicek Nebraska Public Service Commission 300 The Atrium 1200 "N" Street Lincoln, NE 68509 <a href="mailto:Brandy.zierott@nebraska.gov">Brandy.zierott@nebraska.gov</a> <a href="mailto:suevanicek@nebraska.gov">suevanicek@nebraska.gov</a> <a href="mailto:psc.nusf-filings@nebraska.gov">psc.nusf-filings@nebraska.gov</a></p>	<p>Via email: Shana L. Knutson Legal Counsel Nebraska Public Service Commission 300 The Atrium Building 1200 "N" Street, Suite 300 Lincoln, NE 68509 <a href="mailto:Shana.knutson@nebraska.gov">Shana.knutson@nebraska.gov</a></p>
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Michael J. Mills