

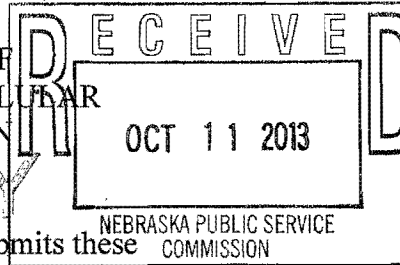
BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Petition of the Nebraska )  
Telecommunications Association for )  
Investigation and Review of Processes and )  
Procedures Regarding the Nebraska )  
Universal Service Fund. )

Application No. NUSF-77, P.O. 9

COMMENTS OF  
UNITED STATES CELLULAR  
CORPORATION

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United States Cellular Corporation ("U.S. Cellular") respectfully submits these

comments for the Nebraska Public Service Commission's ("Commission") consideration in NUSF-77, Progression Order No. 9. These comments are being filed pursuant to the Commission Order entered in the above-referenced docket on October 1, 2013.

U.S. Cellular appreciates the Commission creating the Nebraska Broadband Pilot Project ("NEBP") and the significant efforts the Commission has made to bring broadband services to underserved and unserved rural areas. And overall, U.S. Cellular generally supports the Commission's suggestions set forth in NUSF-77.09. However, U.S. Cellular asks the Commission to consider increasing the support cap per project.

In NUSF-77, P.O. 9, the Commission asked whether a support cap of \$300,000 per project would be reasonable. With the 25% company match included, the project expenditure would total \$400,000. This amount is approximately equal to or even under the amount necessary to construct a wireless tower at today's costs, and in normal circumstances.

While much of the financial details contained in the 2013 NUSF-69 (Dedicated Wireless Fund) applications are confidential, it can be revealed through the funding recommendations made recently by Commission staff in NUSF-69.13, NUSF-69.14 and NUSF.69.15 that wireless tower construction is presently at the \$400,000 mark. As

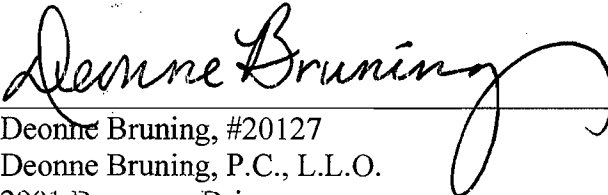
examples, Commission staff's funding recommendations include \$402,020 for Viaero (Brewster North), and \$398,859 for U.S. Cellular (DeWitt).

With the NUSF-69 fund merging into the NEBP in 2014, the NEBP will be the new vehicle whereby wireless carriers may seek NUSF support for new tower construction. While U.S. Cellular is not certain of its 2014 NEBP application plans, it asks the Commission to raise the support cap from \$300,000 per project to \$337,500. This amount would enable a \$450,000 project in total, with the 25% matching requirement from the carrier of \$112,500. While it is not a significant adjustment, the increase would continue to make new tower construction a viable option for wireless carriers, particularly if costs escalate.

Again, U.S. Cellular does not oppose the Commission's proposals to establish caps on the amounts awarded by company, per project or per household. It only seeks the Commission's consideration to examine the amount of the cap, per project, in order to continue the Commissions' strong history of bringing wireless towers to high-cost rural areas that has been available through NUSF-69 since 2008.

Respectfully submitted this 11<sup>th</sup> day of October, 2013.

ATTORNEY FOR UNITED STATES CELLULAR CORPORATION



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## Certificate of Service

The undersigned hereby certifies that on this 11<sup>th</sup> day of October, 2013 an original and one copy of United States Cellular Corporation's Comments in NUSF-77.09 were hand-delivered to the Nebraska Public Service Commission, 1200 N St., Suite 300, Lincoln, NE 68508, and a copy of the same has been e-mailed to:

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