

**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
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	)	
	)	
In the Matter of the Nebraska Public Service Commission on its own motion seeking to implement policies and procedures related to providing dedicated universal service support for wireless telecommunications services.	)	Application No. NUSF-69
	)	
	)	
	)	

**COMMENTS OF  
CITIZENS TELECOMMUNICATIONS COMPANY OF NEBRASKA  
D/B/A FRONTIER COMMUNICATIONS OF NEBRASKA**

In its Progression Order No. 7 (“Progression Order 7”) in these dockets, the Nebraska Public Service Commission (“Commission”) concluded that the dedicated wireless fund program (“NUSF-68 fund”) should be merged into the Nebraska Broadband Pilot Program (“NEBP”) over a period of four years beginning in 2014. On April 23, 2013, the Commission entered its Progression Order No. 8 (“Progression Order 8”) in these dockets, seeking comments on that timeline for the merger of the two funds. The Commission suggested that the merger could occur as a single event in 2014, or perhaps with some variation from the four year transition originally intended.

Pursuant to the Commission’s request, Citizens Telecommunications Company of Nebraska, Inc. (“Frontier”) files the following Comments.

**Discussion**

In Progression Order 7, the Commission decided that the merger of the NUSF-68 fund and the NEBP would be appropriate and beneficial:

The Commission further finds it may be beneficial to combine the NEBP and Dedicated Wireless Fund programs over time. These programs should continue to target needed support so that reasonably comparable access to voice and broadband service is available statewide.<sup>1</sup>

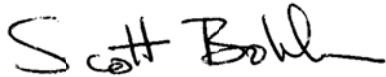
Frontier is not aware of any issues that should prevent that merger from occurring sooner rather than later. The benefits that the Commission recognized would be derived from the merger will be achieved sooner with a complete merger of the two funds in 2014. Therefore, Frontier would urge the Commission to complete the merger in a single step in 2014.

May 21, 2013

Respectfully submitted,

Citizens Telecommunications Company of Nebraska, Inc.  
d/b/a Frontier Communications of Nebraska

By:



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<sup>1</sup> Progression Order 7, page 12.