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BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION SEP - 9 2019

In the Matter of the Commission, on its own motion, seeking to Administer the Nebraska Universal Service Fund Broadband Program. )  
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Application No. NUSF-92 Nebraska  
Progression Order Public Service Commission

**ADDITIONAL COMMENTS OF  
NE COLORADO CELLULAR, INC. d/b/a VIAERO WIRELESS**

NE Colorado Cellular, Inc. d/b/a Viaero Wireless (“Viaero”), respectfully submits these Additional Comments in response to the Nebraska Public Service Commission’s (the “Commission”) Order Seeking Further Comment entered on August 6, 2019 (the “Order”).

Pursuant to the Order, the Commission is considering modifications to its wireless infrastructure grant program, which is designed to update the program criteria and to recognize changes being made by the FCC in regard to universal service support. Viaero respectfully submits the following additional comments to the issues under consideration.

- 1. The current rural threshold should be adjusted from the existing population density of less than 4.9 household per square mile as determined according to the U.S. Census data to at least 10 households per square mile.**

Viaero would submit that the threshold number of population density should be set at 10 households per square mile, based on the most current U.S census data, or other data that is readily available to the state and public.

- 2. The Commission should set standards and criteria for propagation maps submitted with the Applications.**

Viaero recognizes that each carrier’s experience in local markets plays a very important part in overall RF design and propagation analysis. The design teams will utilize various

commercial RF planning tools such as Atoll or Planet which support multiple propagation models including but not limited to COST 231, Standard, Okumura – Hata, Sakagami or Longley – Rice. Each model incorporates numerous variables including digital terrain models and clutter data which may be adjusted on a site by site or even a sector by sector basis to generate a prediction. These selections and the variables associated with them should be the sole responsibility of the carrier. With this in mind, Viaero would propose the following standards and declarations for propagation maps:

1. Show edge of cell speeds with 25 Mbps DL/3 Mbps UL as the minimum, but the provider should also disclose broadband speeds higher than this that are available throughout the predicted area.
2. Use 50 meter or better resolution for the digital terrain data and declare the data source (i.e. USGS).
3. Declare the downlink and uplink loading factors used in the predictive model.
4. Declare the clutter types and values used as well as the data source.
5. Declare the RF planning tool used and the propagation model selected.
6. Declare the tower location, tower ground elevation, tower height, antenna centerline, frequency band and sector azimuth.

The end product for submission to the Commission would be a GIS file in either ESRI .shp or MapInfo .tab format which would represent all downlink and uplink speeds for a proposed site with the minimum broadband speeds of 25 Mbps/3 Mbps with a resolution of at least 50 meters. This file would be done on a per site basis but with the understanding that this is a prediction based on preliminary data and is taken as an isolated case by necessity without the ability to predict the entire network performance.

**3. Vehicle metric data should be used in reviewing applications for recreational and seasonal areas.**

Viaero believes that utilizing vehicle traffic as a metric could be useful when reviewing applications submitted within recreational areas and state parks. However, Viaero would submit that if such data is used as a metric for other applications, the formula, algorithm or tools utilized to determine the traffic should be disclosed to all applicants.

**4. Tower height should not be used as a metric in the review of applications.**

Tower height should not be a metric when evaluating an application, however, the Commission should rely on the population density within the coverage area of an application instead.

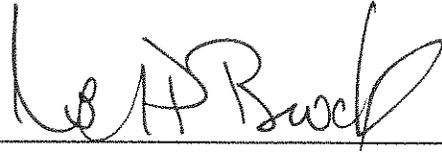
**5. Access to a broadband network should be a requirement for all applications.**

The Application should require that access to a “broadband” network as defined by the FCC and state statutes be provided to the coverage area, as more particularly currently defined as at least 25Mbps download and 3 Mbps upload.

**6. The Commission should require a 25% match.**

The Commission should re-impose a requirement for the Applicant to match at least 25% of the proposed project cost. This financial requirement demonstrates to the Commission multiple commitments from the Applicant. First, this shows that the Applicant is invested in timely completing the project, with a budget conscious perspective. This also shows that the Applicant is a viable company, with financial stability. This requirement also addresses the need to leverage very limited NUSF resources for the greatest number of projects.

Respectfully submitted this 9<sup>th</sup> day of September, 2019.



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## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 9<sup>th</sup> day of September, 2019, one original and one electronic copy of the Additional Comments of NE Colorado Cellular, Inc., d/b/a/ Viera Wireless in NUSF-98, Progression Order No. 8 were hand-delivered to the Nebraska Public Service Commission, 1200 N Street, Suite 300, Lincoln NE and a copy of the same has been e-mailed to the following:

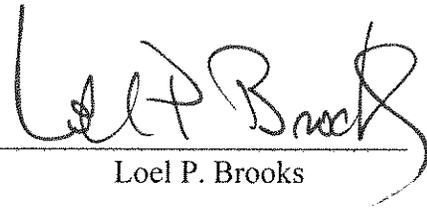
### Nebraska Public Service Commission

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