



**PRE-FILED TESTIMONY OF CULLEN ROBBINS**

1 **Q: Please state your name for the record.**

2 A: Cullen Robbins, C-U-L-L-E-N R-O-B-B-I-N-S

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4 **Q: Where are you employed and in what capacity?**

5 A: I am the Director of the Communications Department at the Commission. Prior to being  
6 named the director of the department, I was the IT/Telecom/GIS Analyst in the  
7 Communications Department. I was involved in the preparation of the staff recommendation  
8 filed with the Nebraska Public Service Commission ("Commission") on August 22, 2016.

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11 **Q: What is the purpose of your testimony?**

12 A: To describe the Staff's recommendations regarding the applications docketed as  
13 NUSF-92.46 through NUSF-92.48. Specifically, my testimony is related to the methodology  
14 developed by the Staff to determine the use of Nebraska Broadband Program support and to  
15 recommend the Commission adopt the Staff's methodology.

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18 **Q: Is your methodology contained in the Staff Recommendation filed with the**  
19 **Commission and served on the parties on August 22, 2016?**

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21 A: Yes, it is.

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**Q: Could you please describe the Staff’s proposed Methodology?**

A: All grant requests were evaluated and analyzed pursuant to the staff methodology, consistent with Commission findings<sup>1</sup>, with results demonstrating recommended NEBP support amounts for the 2016 program year. The Commission allocated a total available amount of \$4.0 million for the 2016 NEBP program year for wireless broadband infrastructure.<sup>2</sup> Three applications were received with a total of 20 projects to construct 23 towers.<sup>3</sup> For purposes of this review, each project was scored individually within the methodology.

Staff and the department reviewed each application to determine compliance with all application requirements.<sup>4</sup> Staff and the department contacted each applicant, as necessary, seeking additional information and clarification of various application specific issues. Application supplements were provided by applicants as needed.

Various pieces of information were taken directly from the applications submitted for each project and utilized in factor development. This data included: location of the proposed tower(s) with longitude and latitude coordinates, county, and census block identification numbers, and total grant request amount for each project.

Additionally, the staff obtained various other data, from publicly available sources, also used in factor development. This data included population and households by census block;<sup>5</sup> area by census block,<sup>6</sup> and road traffic data.<sup>7</sup>

The Commission previously found that dedicated wireless program support should be targeted to serve high-cost unserved and underserved areas. The high-cost areas that are least likely to provide sufficient operating revenues to support tower construction or the placement

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<sup>1</sup> See generally, *In the Matter of the Petition of the Nebraska Public Service Commission, on its Own Motion, to Administer the Nebraska Universal Service Fund Broadband Program*, Application No. NUSF-92, ORDER, (January 26, 2016).

<sup>2</sup> *Id.* at 2.

<sup>3</sup> Subsequent to negotiations, two applicant’s applications were amended, removing six projects to construct six towers from consideration.

<sup>4</sup> *Id.* at 3.

<sup>5</sup> United States Census Bureau, Census 2010 Summary File 1.

<sup>6</sup> United States Census Bureau, 2010 Tiger/Line Shapefiles.

<sup>7</sup>

1 of a cell site without support were identified as those that serve support areas that have less  
2 than 4.5 households per square mile. These areas were identified to be the highest-cost areas  
3 in which to provide service in the Commission's permanent high-cost support mechanism.<sup>8</sup>

4 Staff employed the following methodology described herein to develop a staff  
5 recommendation for 2016 calendar year support:

- 6 1) Based on location, household density, households per square mile, was  
7 determined for all proposed locations. Those towers located in areas with less  
8 than 4.5 households per square mile were identified as serving high-cost areas and  
9 eligible for dedicated wireless program support.
- 10 2) In order to provide benefits to the greatest number of households in high-cost  
11 areas, staff assigned rankings to all towers found to be eligible for funding from  
12 those serving the greatest number of households to those serving the least number  
13 of households.
- 14 3) Further, staff assigned additional proximity rankings to all towers found to be  
15 eligible for funding from those furthest from existing tower locations in the state  
16 to those closest. Distance was only calculated to towers utilizing the same  
17 technology (CDMA or GSM) as the proposed tower.
- 18 4) Further, staff assigned additional rankings to all towers based on the average daily  
19 traffic of all measured roadways within the tower footprint. Those towers with  
20 higher daily traffic counts were given higher priority than those with lower daily  
21 traffic counts. Together, the three rankings then determine the proposed tower's  
22 funding priority. Those towers receiving higher funding priority are funded first.

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25 **Q: Can you describe the results of the Staff Methodology and the proposed**  
26 **recommendation for broadband program support?**

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28 **A:** Yes. The staff proposes the following results, based on the methodology detailed and  
29 described above.

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<sup>8</sup> See *In the Matter of the Nebraska Public Service Commission, on its own motion, seeking to establish a Long-Term Funding Mechanism*, Application No. NUSF-26, Progression Order No. 5 (June 29, 2004) at Appendix A, p. 5.

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**Table 1**  
**2016 NEBP Wireless Broadband Infrastructure Support**

<u>Applicant</u>	<u>Project</u>	<u>Proposed Funding<sup>1</sup></u>
Pinpoint	Hwy47 – Gothenburg	\$439,000.00
Pinpoint	Jeffery Lake	\$79,265.13 <sup>2</sup>
Pinpoint	South Farnam	\$79,265.13 <sup>2</sup>
Viaero	Ruskin	\$306,884.87
Viaero	Deshler	\$295,663.68
Viaero	Humboldt	\$313,396.20
U.S. Cellular	Winnebago	\$445,718.00
U.S. Cellular	Prairie Club/ Kilgore/ Wood Lake	\$1,725,883.00
U.S. Cellular	Wallace	\$314,924.00
	<b>TOTAL</b>	<b>\$4,000,000.00</b>

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<sup>1</sup> All project proposed funding amounts are in full, unless otherwise noted.

<sup>2</sup> Proposed funding amount represents partial support of project.

**Q: Do you have anything further to add at this time?**

A: No, not at this time. I would be happy to answer any questions.

## CERTIFICATE OF SERVICE

I certify that on this 4th day of November 2016, a true and correct copy of the foregoing was sent by electronic mail to the following with the original being filed with the Nebraska Public Service Commission:

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Shana Knutson