BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Nebraska Public Service Commission, on its own motion, seeking to administer the Nebraska Universal Service Fund’s Broadband Program: Application to the Nebraska Broadband Program Received from N.E. Colorado Cellular, Inc., d/b/a Viaero Wireless.

APPLICATION No. NUSF-92.48

TESTIMONY OF
LOEL P. BROOKS
ON BEHALF OF
N.E. COLORADO CELLULAR, INC., D/B/A VIAERO WIRELESS

Q: PLEASE STATE YOUR NAME.
A: My name is Loel Brooks, L-O-E-L B-R-O-O-K-S

Q: WHERE ARE YOU EMPLOYED AND IN WHAT CAPACITY?
A: I am State Regulatory Counsel for Viaero Wireless. My office is at Suite 984, Wells Fargo Center, 1248 O Street in Lincoln, Nebraska.

Q: ARE YOU AUTHORIZED TO TESTIFY ON BEHALF OF VIAERO?
A: Yes, I am.

A: Yes, I have.

Q: DO YOU HAVE TESTIMONY TO OFFER THE COMMISSION REGARDING VIAERO’S APPLICATION FOR FUNDING?
A: Yes. I will provide testimony in support of the Application, filed March 31, 2016 (the “Application”), and how it meets the requirements of this Commission’s Order opening this docket, entered January 26, 2016 (“Opening Order”), adopting certain recommendations for the Wireless Broadband Infrastructure grants and establishing the application window for filing requests for support from the 2016 Nebraska Broadband Program (the “Program”) and identifying certain information required to be submitted in all petitions for support from the Program (collectively “Program Information”).

Q: PLEASE BRIEFLY DESCRIBE VIAERO’S BACKGOUND, ITS OPERATIONS AS A WIRELESS CARRIER AND ETC IN NEBRASKA AND ITS SERVICE OFFERINGS.

A: Viaero was designated as an ETC by this Commission on October 18, 2005. Since that designation, Viaero has aggressively expanded its coverage in Nebraska, and currently owns over 379 telecommunications towers covering roughly 700,000 rural Nebraskans, all of which reside outside of Omaha and Lincoln. Viaero’s wireless coverage extends over 90% of the state’s landmass.

Headquartered in Fort Morgan, Colorado, Viaero employs over four hundred people, well over one hundred of those within the State of Nebraska. Viaero maintains approximately 35 retail stores (including kiosks) in Nebraska, most of which were new construction, and has seven additional dealer locations. In all, Viaero has made over $70 million in capital investments in Nebraska to provide wireless voice and broadband coverage to rural Nebraskans since 2006. Viaero continues to be in the unique position to provide high speed broadband internet access to the largest number of Nebraskans, in the most remote areas of the state, in the shortest period of time.
Q: PLEASE EXPLAIN VIAERO'S PROPOSAL FOR USE OF SUPPORT FROM THE NEBP PROGRAM.

On March 31, 2016, Viaero filed its Application for Funding from the Program and on May 16, 2016, and July 20, 2016, after engaging in negotiations and discussions with other carriers, Viaero filed Notices of Withdrawal of Projects for Funding from the Program ("Withdrawal Notices"). As a result of the Withdrawal Notices, in which five (5) projects were withdrawn, Viaero requested funding for seven (7) discrete and separate projects (singularly "Project" or collectively, "Projects"). Each Project involves the construction of a new cellular tower with 4G equipment that will provide mobile voice and broadband service in rural and high-cost areas of Nebraska. Each Project contained in the Application is a separate Project and the Commission is not required to fund any Project in any particular order. The Projects and the proposed costs to the Program for each Project are as follows:

Deshler Project - $394,218.24
Falls City Project - $389,323.37
Hebron Project - $385,422.64
Humbolt Project - $417,861.60
Lake Waconda Project - $419,588.88
Ruskin Project - $409,179.83
Tecumseh Project - $418,327.56

Q: DOES VIAERO'S APPLICATION COMPLY WITH THE COMMISSION'S ORDERS CONCERNING THE PROGRAM?
Yes, Viaero believes that each Project described in the Application meets each and every criterion for funding established in this Docket, as well as docket NUSF-69, as provided in the Opening Order. Viaero offers wireless service at a low cost per rural subscriber. Each Project will also provide mobile broadband service, maximizing its utility for all consumers, including enhancing public safety. At a price that was not commercially viable just a few years ago, Viaero can provide competitive broadband speeds to a significant number of unserved and underserved Nebraskans.

Q: WILL OTHER COMPANIES BE ASSOCIATED WITH THE IMPLEMENTATION OF VIAERO’S PROPOSED PROJECT?
A: No. The only company associated with the Project is Viaero.

Q: PLEASE DESCRIBE THE PROPOSED BROADBAND PROJECT PLAN.
A: In brief, each of the Projects consists of the construction of a new wireless tower and related infrastructure, and will be designed to deliver mobile wireless telecommunication service and broadband service to high-cost, rural areas in Nebraska that are either unserved or underserved. Support from the Program for these Projects would enable consumers in these areas to obtain wireless services which exceed the Commission’s specified minimum of at least 4 Mbps downstream and 1 Mbps upstream.

In its Application, Viaero submitted for consideration seven (7) discrete Projects for funding and each Project may be funded at the Commission’s option, in no particular order. Details of the specific Projects are contained in the Application.

Q: HOW DID VIAERO IDENTIFY WHICH AREAS WERE “UNSERVED” OR “UNDERSERVED”, AS DEFINED BY THE COMMISSION?
Since 2003, Viaero’s business model has focused on the deployment of an extensive wireless network in the State of Nebraska in unserved and underserved areas. Drawing on its experience as a successful wireless telecommunications operator in areas surrounding the proposed “unserved” and “underserved” service areas, Viaero accessed, through a third-party provider, data from the National Broadband Map to assist in evaluating areas of the state that are served, underserved and unserved. Viaero used the National Broadband Map to identify “served” areas based upon the Commission’s criterion of 4 Mbps downstream and 1 Mbps upstream, and removed those areas for consideration for potential sites. Viaero then used the National Broadband Map to identify “unserved” and “underserved” areas, and correlated that information with its own internal data from previously conducted independent drive testing along with published information from other wireless carriers. Viaero used all that information to create a map showing the various levels of coverage in the proposed service areas and based the statements in its Application regarding a proposed site’s “unserved” and “underserved” make-up on that map.

Q: DID VIAERO SUPPLY CENSUS BLOCK DATA FOR ALL LOCATIONS WHERE BROADBAND FACILITIES WOULD BE DEPLOYED UNDER EACH INDIVIDUAL PROPOSED PROJECT?

A: Yes. Viaero attached census block data to its Application identifying those census blocks which would receive broadband coverage under each proposed Project. This data was compiled using 2010 Census Block boundaries as required by the Commission, which also yielded the population coverage information provided.
Q: DID VIAERO PROVIDE AN ESTIMATE OF THE NUMBER OF POTENTIAL NEW BROADBAND SUBSCRIBERS WHICH WOULD BE REALIZED IF THE PROJECT IS IMPLEMENTED?

A: Drawing on its experience as a successful wireless telecommunications operator in the areas surrounding the proposed "unserved" and "underserved" service areas, Viaero has generated an estimate of the number of broadband subscribers it expects to obtain within the "unserved" and "underserved" service areas when the Project is operational. These estimates were contained within the Application in attached Confidential Exhibits 1-C, 1-D, 1-E, 1-G, 1-I, 1-J and 1-L.

Q: HAS VIAERO DEVELOPED A BROADBAND DEPLOYMENT SCHEDULE FOR THE PROJECT?

A: Yes, Viaero estimates that it can deploy the Project on the schedule set forth below. This schedule is well within the 24-month timeframe established by the Commission. The estimate is based on its experience in the Nebraska market.

Q: PLEASE DESCRIBE VIAERO'S ESTIMATED DEPLOYMENT SCHEDULE.

A: Overall time for completion of a Project is estimated to be approximately 9 months, excluding unforeseen delays associated with obtaining equipment, licenses, or zoning permits. Estimated completion milestones and time frames for each milestone are as follows:

<table>
<thead>
<tr>
<th>Completion Percentage</th>
<th>Description of Milestone</th>
<th>Time Frame</th>
</tr>
</thead>
<tbody>
<tr>
<td>25%</td>
<td>Completion of all equipment ordering, submission of applications and</td>
<td>8 weeks</td>
</tr>
<tr>
<td>%</td>
<td>Event Description</td>
<td>Duration</td>
</tr>
<tr>
<td>-------</td>
<td>-----------------------------------------------------------------------------------</td>
<td>----------</td>
</tr>
<tr>
<td>50%</td>
<td>Delivery of all equipment and completion of all construction and implementation plans</td>
<td>16 weeks</td>
</tr>
<tr>
<td>75%</td>
<td>Receipt of all approvals and commitments of construction; implementation and deployment</td>
<td>25 weeks</td>
</tr>
<tr>
<td>100%</td>
<td>Completion of all installations, tuning, testing and turn-up</td>
<td>36 weeks</td>
</tr>
</tbody>
</table>

1. Q: **WHAT IS THE PROPOSED BUDGET FOR THE PROJECT?**
2. A: The proposed budgets for each Project are attached to the Application as Confidential Exhibits 1-C, 1-D, 1-E, 1-G, 1-I, 1-J and 1-L, and have been generally described earlier in my testimony.
3. Q: **PLEASE DESCRIBE VIAERO'S PROPOSED RETAIL PRICING FOR ITS PROPOSED BROADBAND PROJECTS.**
4. A: Viaero’s proposed retail pricing for its broadband products was attached to the Application as Exhibit 3.
5. Q: **PLEASE DESCRIBE VIAERO’S COMMITMENT TO OFFER BROADBAND SERVICES.**
A: Viaero hereby commits to offering broadband service to all households within any approved service area for at least five (5) years.

Q: PLEASE DESCRIBE VIAERO'S COMMITMENT TO PARTICIPATE IN THE COMMISSION'S MAPPING EFFORTS.

A: While the State Broadband Data and Development ("SBDD") Program has been completed, Viaero hereby commits to participate and provide broadband data to the Commission and its vendors in the future if requested to do so.

Q: PLEASE PROVIDE A DESCRIPTION OF VIAERO'S FINANCIAL QUALIFICATIONS.

A: Copies of Viaero's audited financial statements as of December 31, 2014 (the latest audited financials available) were filed with Viaero's Application as Confidential Exhibit 4.

Q: PLEASE DESCRIBE VIAERO'S FINANCIAL, TECHNICAL AND MANAGERIAL COMPETANCE.

A: Viaero is managed by a team of experienced telecommunications professionals with extensive experience providing wireless service, including wireless data service, within the proposed service territory. A description of the background of the senior management team is attached to the Application as Exhibit 5.

Viaero currently operates an extensive wireless network in the State of Nebraska and has a proven track record of financial and technical competence in the design and operation of wireless telecommunications networks. Viaero monitors the performance of its voice and data network on a site-by-site basis from its Network Operations Center in Fort Morgan, Colorado on a 24 hours per day, 7 days a week, 365 days a year basis.
Q: HAS VIAERO PROVIDED AN AFFIDAVIT ATTESTING TO THE TRUTH AND ACCURACY OF ALL INFORMATION INCLUDED IN THE APPLICATION?

A: Yes, the Affidavit attesting to the truth and accuracy of the information contained in the Application was attached to the Application as Exhibit 6.

Q. IN ADDITION TO SATISFYING THE TECHNICAL CRITERIA FOR FUNDING ESTABLISHED BY THE COMMISSION IN ITS PRIOR ORDERS IN THIS DOCKET AND IN NUSF-69, ARE THERE ANY OTHER REASONS THAT THE COMMISSION SHOULD GRANT VIAERO'S PETITION AND GIVE ITS PROPOSED PROJECTS PRIORITY FUNDING STATUS?

A: Yes, Viaero has demonstrated a commitment since 2003 to the deployment of an extensive wireless network in the State of Nebraska focusing on unserved and underserved areas. While Viaero has sought and successfully received funding from the Commission for expansion of its network and the deployment of its 911 capabilities over the years, Viaero has also constructed and deployed over 300 towers in its Nebraska service territory without subsidies from Commission programs, while 79 towers have been constructed with NUSF funding subsidies. Viaero’s historic track record of private investment in the unserved and underserved areas of the State is unique among wireless carriers currently providing services in the State and underscores Viaero’s dedication, knowledge, expertise and financial commitment to the deployment of a high quality telecommunications network, which now covers over 90% of the State’s geographic area. The granting of Viaero’s Application will serve to enhance its already robust network and bring high speed mobile and broadband service to rural Nebraska.
Viaero focuses not only on the provision of services in rural areas, where it is difficult for most carriers to deploy cost effective broadband services, but on providing low cost per-subscriber service, which emphasizes and promotes the Commission’s Nebraska Universal Service Fund Broadband Program public policies.

**Q:** IS VIAERO PREPARED TO CONTINUE TO PROVIDE THE FINANCIAL MATCH TO MEET PROJECT COMMITMENTS AS HISTORICALLY REQUIRED BY THE COMMISSION IN NUSF-77 PROGRESSION NO. 5, AND NUSF-92 PROGRESSION ORDER NO. 3?

**A:** Yes. While the Commission determined in its Broadband Order that the historic twenty-five percent (25%) match provision is no longer a “bright line requirement”, Viaero has elected to continue is historic commitment to fund twenty-five percent (25%) of the cost of each Project, with the remaining cost of each Project to be funded from the Program. A description of Viaero’s financial match was included in the Proposed Budget for each Project and attached to the Application in Confidential Exhibits 1-C, 1-D, 1-E, 1-G, 1-I, 1-J and 1-L as previously described in my testimony.

**Q:** HAVE YOU REVIEWED THE RECOMMENDATIONS FROM THE COMMISSION STAFF FILED ON AUGUST 22, 2016, REGARDING FUNDING AWARDED UNDER THE NEBP PROGRAM AND DO YOU HAVE ANY COMMENTS ON THE COMMISSION STAFF’S RECOMMENDATION?

**A:** Yes, I have carefully reviewed the Recommendation of the Commission Staff (the “Recommendation”) and the Staff’s explanation of the methodology it used in making its Recommendation. While Viaero is very grateful for the Commission Staff’s

---

1 See In the Matter of the Nebraska Public Service Commission, on its own motion, seeking to administer the Nebraska Universal Service Fund’s Broadband Program, Application No. NUSF-92, Recommendation of the Commission Staff (August 22, 2016) ("Recommendation").
Recommendation of funding for three (3) of Viaero’s remaining seven (7) Projects, Viaero believes that the Recommendation lacks internal consistency and overlooks several important funding principles and policies established by the Commission in prior Dockets under NUSF-69, NUSF 77, and NUSF-92. I would like to provide a summary of those inconsistencies, principles and policies as a foundation for a request for further evaluation and consideration of the Recommendation by the Commission. The Staff specifically provided that its Recommendation was “subject to the evidence presented at the Hearing”, 2 so it seems appropriate to provide Testimony which might provide guidance to the Staff and the Commission concerning the methodology used by the Staff in arriving at its Recommendation.

Commission Objectives for Evaluating Projects

The Commission decided in NUSF-92 Progressing Order No. 53 issued on October 27, 2015 (the “Allocation Order”), to alter its approach to allocating NUSF support to NUSF-92 Broadband Grants. Rather than utilizing the complex algorithmic weighting methodology developed under prior NUSF-92 Dockets, the Commission decided to allocate NUSF-92 broadband support on projects “similar to the projects supported through the Commission’s Docket in NUSF-69”. 4 However, the Commission also decided to utilize certain components of the historic NUSF-92 funding policies as well as some new features to provide more “targeted and predictable support” to consumers lacking wireless broadband. 5 The Commission also announced a new Project support

---

2 Id., at 2.
3 In the Matter of the Nebraska Public Service Commission, on its Own Motion, to Administer the Nebraska Universal Service Fund Broadband Program, Application No. NUSF-92, Progression Order No. 5, Order Seeking Comments (October 27, 2015), p. 1.
4 Id.
5 Id.
allocation methodology for the first time in the Recommendation issued on August 22, 2016.\(^6\)

**Factors in the Staff’s Methodology**

It is important to note at the outset that the Staff evaluated and analyzed each Application to determine compliance with all application requirements, and found each Application to be in conformance with the Commission’s application requirements and “eligible for consideration of support” subject to the Methodology described in the Recommendation.\(^7\)

The Staff then articulated four (4) factors comprising its Methodology in this Docket:

1. **Household density** - areas with less than 4.5 households/sq. mile were deemed the “highest cost” and areas that are “least likely to provide sufficient operating revenues to support tower construction or the placement of a cell site without support.”\(^8\)

2. **Households served** – This factor weighted projects by assigning higher weight to tower projects located in high-cost areas which served the greatest number of households over those serving the least number of households.

3. **Tower proximity rankings** – This factor gave greater weight to towers furthest from existing tower locations, but restricted that factor to distance between towers with the “same technology” (CDMA/GSM).

4. **Average daily traffic** - This factor was applied to all tower projects and measured “average daily traffic counts of all measured roadways with the tower footprint” with

---

\(^6\) See *In the Matter of the Nebraska Public Service Commission, on its own motion, seeking to administer the Nebraska Universal Service Fund’s Broadband Program*, Application No. NUSF-92, Recommendation of the Commission Staff (August 22, 2016).

\(^7\) *In the Matter of the Nebraska Public Service Commission, on its own motion, seeking to administer the Nebraska Universal Service Fund’s Broadband Program*, Application No. NUSF-92, Recommendation of the Commission Staff (August 22, 2016), p.3.

\(^8\) *Id.*

-12-
“towers with higher daily traffic counts” being given higher priority that those with lower daily traffic.9

Viacro acknowledges that Methodology Factors 1 and 2 above are similar to factors used by the Commission in the early NUSF-69 Dockets. Those factors (1) targeted support to the highest cost areas, where a business case would not otherwise exist to provide infrastructure for broadband service without support, and (2) encouraged Projects which reached the greatest number of households in those areas. However, Methodology Factor 3 is not stated in the manner articulated in NUSF-69 and Methodology Factor 4 is both brand new and not used in a fashion which is consistent with the Commission’s Opening Order.

While Methodology Factor 3 incorporates the “tower proximity” concept was used in NUSF-69, the Recommendation restricts the measurement of proximity to “towers utilizing the same technology (CDMA or GSM) as the proposed tower.”10 This restriction was not stated in the Commission’s historic NUSF-69 Docket Orders,11 and references technology labels that are on longer relevant in the industry. Given the advances in cellular technology since the NUSF-69 time period, there is no longer a way to meaningfully delineate or identify cellular services or towers utilizing these labels.

Further, the Commission’s policies regarding the allocation of NUSF Funds for broadband services have evolved significantly since the initial NUSF-69 process was

9 Id., at 5.
10 Id.
11 For example, see 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-69.03, Order Granting Application (October 20, 2009), p. 3 and 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-69.06, Order Granting Application in Part (November 3, 2010), p. 3.
utilized. Two specific policies embraced by the Commission in NUSF-77 and NUSF-92 clearly articulate the Commission’s commitment to limit support in certain situations:

a. The Commission has declined to authorize NUSF Support to Projects in areas where unsupported broadband service is already being provided; and

b. The Commission has limited Project support to "one fixed and one mobile broadband provider" in a service area under its "comparable access" policy. These policies provide salient direction concerning the Commission’s evolving allocation strategy and should not be ignored simply by virtue of the fact that the Commission is seeking to resort to a less complicated allocation methodology. The important principles established in recent Dockets provide the foundation for the Commission’s NUSF support policies and should drive the allocation process, rather than being ignored.

Therefore, the use of Methodology Factor 3 as stated in the Recommendation does not advance the interests of the Commission in ranking tower projects.

Methodology Factor 4 is entirely new to the Commission’s policy consideration and is an entirely new Methodology Factor. Viaero has for years advocated for a factor which recognizes the need for NUSF support in areas where there is evidence of high traffic but very low household density. These areas are typically in or around recreation areas like lakes and parks, which would not meet the Commission’s historic ranking criteria favoring projects serving the greatest number of households, as reflected in Methodology Factor 2 in the Recommendation. These projects simply never received funding priority. In

---


13 See, 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, Progression Order No. 7 (January 15, 2013), p. 11.
adopting traffic data for a project as a separate Methodology Factor, the Commission specifically stated that this Factor would be relevant to the “need for service near recreational areas.”\(^{14}\)

However, in spite of this Commission’s specific targeted limitation for this Factor, the Recommendation has applied this Factor to all tower projects, granting higher priority to tower projects with higher daily traffic counts. In preparing its Application, Viaero concluded that providing traffic data for all Projects was not required and that it did not have an accurate way to gather traffic data over the service areas of most of its Project sites because in most cases, the road boundaries measured on public road maps did not meaningfully correspond with coverage areas of the Projects sought for funding support. Indeed, no Applicant provided traffic data in their Original Applications. Further, the Commission had not announced that traffic data would be a factor for prioritizing projects other than those near recreation facilities. Based on the foregoing, the use of Methodology Factor 4 (Traffic Data) for all Projects is not appropriate.

A final issue is the failure of the Recommendation to evaluate or even consider the historic 25% Match Requirement. Based on recommendations by other service providers that requiring the Match would make most proposed projects in high cost areas uneconomical, and projects “would not exist absent support,”\(^ {15}\) the Commission determined that the Match should not be a “bright line requirement” and that it would consider evidence showing that expected revenues would not be sufficient to cover the costs of the tower project.\(^ {16}\) This was a distinct change in the Commission’s historic

---

\(^{14}\) See, In the Matter 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), p. 2.

\(^{15}\) Id., at 2-3.

\(^{16}\) Id., at 3.
Policy requiring a Match in order to leverage scarce NUSF resources and require an economic stake in the Project by the Applicant.17

The Recommendation did not speak to this issue at all. Nor did it recognize that each of Viaero’s Projects contained a 25% Match, or that US Cellular requested a waiver of the Match in all of is Projects except the Wallace Project, or that Pinpoint neither offered a match nor requested a waiver of the match. The Commission would have been advised to have considered and commented on the fact that certain projects represented to be “uneconomical” by a carrier, thereby warranting a waiver for the Match, were awarded funding in areas where existing service was already being provided by one of more unsubsidized carriers, thus raising significant doubt about the characterization that the area was “uneconomical” to serve and potentially violating the Commission’s policy regarding comparable access funding. Further, no credit or priority was assigned to Viaero by providing a Match for each of its Projects thereby reducing its total Funding requests by over $1.2 million.

CONCLUSION

In conclusion, Viaero is always grateful for the Commission’s Support Recommendation. However, in this case, Viaero believes that the Recommendation and new Methodology do not accurately reflect the Commission’s stated objectives in the Opening Order and do not consider other important funding policies adopted and utilized by the Commission in prior Dockets. Viaero has undertaken enormous efforts, in good faith reliance on the Commission’s evolving NUSF funding policies, to present a wide array of proposed projects for consideration. Its commitment to the historic Matching requirement for all of

17 See, In the Matter of the Petition of the Nebraska Telecommunications Association for Investigation and Review of Processes and Procedures Regarding the NUSF, Application No. NUSF-77, Progression Order No. 4, Order Seeking Findings, Seeking Further Comments and Setting Hearing (September 27, 2011), p. 11.
its Projects demonstrates the importance of the principle of leveraging scarce public funds and putting its own resources at risk to make a project financially feasible.

Viaero respectfully requests that the Commission and Staff further consider and evaluate the Recommendation and Staff’s Methodology so that the Commission’s stated NUSF funding policies can be carried out in a more consistent and equitable manner.

Q. DOES THIS CONCLUDE YOUR TESTIONY?

A. Yes.
CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 4th day of November, 2016, an original, five copies and an electronic copy of the Pre-filed Testimony of Loel P. Brooks in Docket No. NUSF-92.48 were delivered to:

Shana Knutson
Nebraska Public Service Commission
1200 N Street, Suite 300
Lincoln, NE 68508
shana.knutson@nebraska.gov

Sue Vanicek
Nebraska Public Service Commission
1200 N Street, Suite 300
Lincoln, NE 68508
sue.vanicek@nebraska.gov

Brandy Zierott
Nebraska Public Service Commission
1200 N Street, Suite 300
Lincoln, NE 68508
brandy.zierott@nebraska.gov

Loel P. Brooks
CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 4th day of November, 2016, an electronic copy of the Pre-filed Testimony of Loel P. Brooks in Docket No. NUSF-92.48 was delivered to:

Deonne Bruning  
On behalf of U.S. Cellular  
deonnebruning@ncb.rr.com

Russ Westerhold  
on behalf of Pinpoint Wireless  
rwesterhold@fraserstryker.com

Loel P. Brooks