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January 13, 2015

VIA OVERNIGHT DELIVERY

Mr. Steve Meradith
Nebraska Public Service Commission
1200 N Street, Suite 300
Lincoln, Nebraska 68508

Re: Application No. NUSF-99

Dear Mr. Meradith:

Enclosed are the original and one (1) copy of the Comments of Charter Fiberlink – Nebraska, LLC in connection with the above-referenced proceedings. Please file these comments in your usual fashion and return one (1) file-stamped copy to us in the enclosed self-addressed envelope.

If you have any questions regarding the foregoing, please contact the undersigned.

Sincerely,

Kennard B Woods

Kennard B. Woods
Counsel for Charter Fiberlink – Nebraska, LLC

KBW/nh
Enc.
cc: Charter Fiberlink – Nebraska, LLC
Charles A. Hudak, Esq.

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Nebraska Public Service Commission, on its Own Motion, Motion, to Administer the Universal Service Fund High-Cost Program	))))	Application No. NUSF-99 COMMENTS OF CHARTER FIBERLINK - NEBRASKA, LLC

Charter Fiberlink - Nebraska, LLC ("Charter") submits these initial Comments for the Nebraska Public Service Commission's (the "Commission") consideration in the above-captioned proceeding. Charter's comments are being filed pursuant to the Commission's Order Opening Docket and Setting Hearing ("Order Opening Docket"), entered on October 15, 2014, the Order Extending Comment Deadline and Revising Procedural Schedule, entered on October 29, 2014, and the Order Extending Comment Deadline, entered on December 2, 2014. Charter appreciates the opportunity to comment regarding whether the Nebraska Universal Service (the "NUSF") should be transitioned in whole or part to support price cap carriers' broadband services.

I. Summary of Charter's Position

The Commission has concluded it has the legal authority to use state universal service funds for the purpose of subsidizing broadband deployment. The Commission also maintains that "it may be an appropriate time to consider changes to its allocation mechanism for price cap carriers to complement federal universal service reform," and seeks to ensure that those carriers can coordinate the use of state high-cost support with their federal Connect America Fund ("CAF") support.[1] However, transitioning the NUSF to further support broadband deployment would be at best premature and at worst a commitment that may result in overly subsidizing ILECs and deterring competition. While federal high-cost universal service funding is transitioning to subsidize broadband deployment, the CAF is in its initial stages and many matters concerning its

[1] Order Opening Docket, p. 2.

implementation remain uncertain. As the CAF is implemented within the next two years there will be an opportunity for the Commission to assess its effects on end users and competing providers' broadband services. At this point, however, the effects of the Federal Communications Commission's (the "FCC") reforms on state high-cost programs are not quantifiable with respect to end users and the deployment of broadband service. In addition, the Nebraska Broadband Pilot Program (the "NEBP")[2] is still in the early stages of implementation, while the primary mission of the NUSF remains the support of necessary telecommunications services through the existing High Cost Program. There is no evidence that demonstrates that the CAF program is or will be incapable of targeting areas in need, that federal universal service funding will be insufficient to subsidize price cap ILECs, that the NEBP and competitive forces will be inadequate to meet demand in Nebraska, or that, to the extent that continuing universal service subsidies are viewed as necessary, the Commission should further subsidize broadband services. In short, the effects of the CAF should be fully understood before the Commission undertakes further steps to subsidize broadband deployment. Charter suggests steps the Commission can take, in the meantime, to reform the NUSF consistently with preserving and enhancing telecommunications competition.

II. The State and Federal Universal Service Programs

A. The High-Cost Program and the NEBP

The Nebraska Telecommunications Universal Service Fund Act (the "Nebraska Universal Service Act"), enacted in 1997, authorized the creation of the NUSF. As stated in Neb. Rev. Stat. § 86-317, the fundamental purpose of the Nebraska Universal Service Act is to "authorize the [C]ommission to establish a funding mechanism which supplements federal universal service support mechanisms and ensures that all Nebraskans, without regard to their location, have

[2] The NEBP is also referred to as the "Nebraska Universal Service Fund Broadband Program." 2014 Annual Report to the Legislature on the Status of the Nebraska Telecommunications Industry, Nebraska Public Service Commission (September 30, 2014) ("2014 Annual Report"), p. 20.

comparable accessibility to telecommunications services at affordable prices."[3] Neb. Rev. Stat. § 86-324(1) provides that:

> the [NUSF] shall provide the assistance necessary to make universal access to telecommunications services available to all persons in the state consistent with the policies set forth in the Nebraska Telecommunications Universal Service Fund Act. Only eligible telecommunications companies designated by the commission shall be eligible to receive support to serve high-cost areas from the fund. A telecommunications company that receives such support shall use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. . . .

Accordingly, the Commission established the High Cost Program of the NUSF to distribute universal service subsidies to eligible telecommunications carriers ("ETCs"), primarily ILECs, to recover the costs of providing basic voice telecommunications service in rural areas. In its Order Opening Docket, the Commission affirmed that the High Cost Program has "effectively targeted high-cost support to the highest cost areas of the state for a number of years." In targeting and distributing assistance to ETCs to support basic voice services, the focus of the NUSF has been similar to other states' universal service programs.

Neb. Rev. Stat. § 86-323(4) declares that "[a]ll providers of telecommunications should make an equitable and nondiscriminatory contribution to the preservation and advancement of universal service."[4] Neb. Rev. Stat. § 86-323(5) admonishes that "mechanisms" to advance universal service "should be specific, predictable, sufficient, and competitively neutral." To date, the Commission has determined that providers of local exchange service, wireless services, in-state long distance services, and voice over the Internet Protocol (VoIP) services should contribute to the NUSF.

[3] Although the Nebraska Universal Service Act directs that NUSF subsidies are to be provided for "telecommunications services," the Nebraska Universal Service Act does not define that term. Similar to the federal definition, 47 U.S.C. § 153(53), Neb. Rev. Stat. § 86-121 defines "telecommunications service" as "the offering of telecommunications for a fee" for purposes of the Nebraska Telecommunications Regulation Act (Neb. Rev. Stat. §§ 86-101 to 86-165).

[4] Neb. Rev. Stat. § 86-320.01 defines "telecommunications" as "the transmission between or among points specified by the user of information of the user's choosing without change in the form or content of the information as sent and received." The same definition is virtually identical to the same term in 47 U.S.C. § 153(50).

On November 10, 2010, pursuant to a petition filed by the Nebraska Telecommunications Association, the Commission concluded it has the legal authority to provide NUSF support for broadband capital improvement projects.[5] The Commission based its conclusion on the policy declarations in Neb. Rev. Stat. § 86-323, which reference access to "advanced telecommunications and information services" in "all regions of the state."[6] Through several orders the Commission then established the NEBP.[7] In contrast to the Commission's High-Cost Program, the NEBP was created as a grant program to target assistance to broadband providers regardless of whether they are certificated by the Commission, so long they meet certain eligibility requirements.[8] To allocate designated NEBP funds, the Commission established a review process to give highest priority to providing broadband service in areas considered to be "unserved." Areas considered "underserved" also are eligible for broadband support but are given less priority.[9] NEBP grant recipients must make certain commitments in order to receive assistance.[10]

The implementation of the NEBP is quite recent, having only commenced in January 2012. On January 15, 2013, the Commission decided that its separate dedicated wireless fund program

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[5] *Re Nebraska Telecommunications Association*, Application No. NUSF-77, Progression Order No. 1 (November 3, 2010).

[6] The terms "advanced telecommunications" and "information services" are not defined by Nebraska statutes.

[7] *Re Nebraska Telecommunications Association*, Application No. NUSF-77, Progression Order 5 (November 21, 2011). *See discussion* in *Re Nebraska Telecommunications Association*, Application No. NUSF-77, Application No. NUSF-69, Progression Order 9, 2013 WL 3009459 (Neb. P.S.C. April 23, 2013).

The Commission has created five programs within the NUSF: (1) the High Cost Program; (2) the low income assistance program, known as the Nebraska Telephone Assistance Program, and formerly known as the Lifeline/Link-Up Program; (3) the Rural Tele-Health Program; (4) the dedicated wireless fund program, referenced below; and (5) the NEBP.

[8] *See Re Nebraska Telecommunications Association, Application*, No. NUSF-77, Progression Order No 4, 2011 WL 6190817 (Neb. P.S.C. September 27, 2011).

[9] *Id.* "Unserved" was defined as any area where no facilities-based provider offers broadband, and where Internet connectivity can only be made through dial-up service. "Underserved" was defined as any area where a facilities-based provider offers Internet access at speeds greater than 56K down but not greater or equal to those speeds defined as broadband. In addition, the Commission defined "broadband" as service that provides consumers with a minimum actual download speed of 4 Mbps and upload speed of 1 Mbps, thus mirroring the FCC's National Broadband Plan standard. The Commission also determined that the definition of broadband would be subject to ongoing review and revision as needed to meet consumer demand. *Id.*

[10] *See* 2014 Annual Report, pp. 22-23.

(NUSF-69) would be transitioned over a four (4) year period, beginning in 2014, into the NEBP.[11] On September 4, 2013, the Commission decided that the wireless program would be combined into the NEBP in 2014.[12]

During the fiscal year that recently ended, the NUSF collected $50.2 million in contributions.[13] In September 2014, the Commission determined that the support available for distribution in 2015 to the NEBP would be $8,492,000; *i.e.*, more than twice the amount of the original allocation of funds to the NEBP.[14] By comparison, $37,274,000 is authorized for the High Cost Program for calendar year 2015.[15] Thus, assistance for voice telecommunications services remains the primary focus of the NUSF.

B. Federal Universal Service and the CAF Program

On November 18, 2011, the FCC, seeking to reform both intercarrier compensation and the manner in and purposes for which federal high-cost universal service support would be distributed, released the *Transformation Order*.[16] As regards intercarrier compensation, the FCC announced a seven (7) to nine (9) year period, ultimately ending in July 2020, in which reciprocal compensation

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[11] *See Re Nebraska Telecommunications Association*, Application No. NUSF-77, Application No. NUSF-69, Progression Order 9, 2013 WL 3009459 (Neb. P.S.C. April 23, 2013). Note: the Commission originally reported this decision as Progression Order 8.

[12] *See Re Nebraska Telecommunications Association*, Application No. NUSF-77, Application No. NUSF-69, Order (September 4, 2013).

[13] 2014 Annual Report, p. 21.

[14] This amount includes NEBP grant support that was not distributed in 2014. Of the total support amount, $7,992,000 is to be allocated for NEBP capital improvement projects and $500,000 will be available for broadband adoption projects. *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. 3, 2014 WL 4406875 (Neb. P.S.C. September 3, 2014). *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, Progression Order No. 2, 2014 WL 4406874 (Neb. P.S.C. September 3, 2014).

[15] *Nebraska Public Service Commission, on its own motion, seeking to make adjustments to the universal service fund mechanism established in NUSF-26*, Application No. NUSF-50, Order Authorizing Payments, 2014 WL 4406872 (Neb. P.S.C. September 3, 2014).

[16] *Connect America Fund et al., WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking*, 26 FCC Rcd 17663 (2011), *aff'd sub nom, In re FCC 11-161*, ___ F.3d ___, 2014 WL 2142106 (10th Cir. May 23, 2014).

and terminating switched access charges would be transitioned to "bill and keep." To replace lost revenues, the FCC announced that ILECs would be able to impose an "Access Recovery Charge" ("ARC").[17] If an ILEC believes it needs additional support, it must petition the FCC and "demonstrate a need" for such support by a showing of credible evidence, such as through a rate case or other evidentiary hearing.[18]

As concerns federal high-cost universal service support, the *Transformation Order* created the CAF to provide, in relevant part, subsidies in two phases to price cap ILECs for the deployment of broadband services. In "Phase I," price cap ILECs were eligible to receive broadband support in addition to existing federal high-cost universal service support. Phase I provided more than $438 million for wireline broadband deployment to serve 1.6 million people who previously lacked broadband connections. Phase I also invested $300 million to expand advanced mobile wireless service. For "Phase II," the FCC initially determined that price cap ILECs would have a right of first refusal to broadband support for high-cost rural areas unserved by unsubsidized competitors providing at least 4 Mbps for downloads and 1Mbps for uploads (4 Mbps/1 Mbps). The *Transformation Order* directed that areas supported by Phase II broadband subsidies would be served with the foregoing bandwidths, with 6 Mbps/1.5 Mbps to a number of supported locations. High-cost areas for which price cap ILECs would decline Phase II subsidies would be subject to a bidding process in which competitive ETCs could participate. As the FCC reported last year, Phase II would offer nearly $9 billion in broadband subsidies, a nearly 70% increase in annual support for

[17] *Transformation Order*, ¶¶ 36-37. The CAF also provides support to ILECs for any otherwise eligible revenue not recovered by the ARC. *Id.*, ¶ 37.

[18] *Id.*, ¶¶ 924-27. The FCC also determined that there will be minimum "benchmark" local telephone rates applicable to recipients of CAF support, implemented over a multi-year period ending in 2018. *Connect America Fund et al.*, WC Docket No. 10-90 et al., Report And Order, Declaratory Ruling, Order, Memorandum Opinion and Order, Seventh Order On Reconsideration, and Further Notice of Proposed Rulemaking, FCC 14-54 (rel. June 10, 2014).

broadband and voice service in areas served by price cap ILECs.[19] The *Transformation Order* separately established a "Remote Areas Fund" to provide support for "extremely high-cost" areas – *i.e.*, areas above the cost threshold to be created by the FCC's Phase II cost model – and set a budget of "at least" $100 million for such support.[20]

Last month the FCC released its *December 2014 Connect America Fund Order*,[21] announcing several significant changes to the Phase II program. First, the FCC decided to require carriers receiving CAF subsidies for fixed broadband service to provide bandwidth of at least 10 Mbps/1 Mbps. Specifically, the FCC decided to exclude from its initial offer of support to price cap ILECs any area served by a subsidized facilities-based terrestrial competitor that offers fixed residential voice and broadband services meeting or exceeding 4 Mbps/1 Mbps.[22] The FCC concluded that high-cost blocks that are thereby excluded from the initial offer of support – including blocks with service meeting or exceeding the new 10 Mbps/1 Mbps speed requirement – would nevertheless be eligible for support in the Phase II competitive bidding process. In addition, the FCC concluded that any area served by an unsubsidized facilities-based terrestrial competitor that offers 10 Mbps/1 Mbps would not be eligible for support in the Phase II competitive bidding process.[23] The foregoing changes in effect provide competitive ETCs with more opportunities to bid for Phase II subsidies, while, by increasing the supported speeds to 10 Mbps/1 Mbps, reducing the number of areas that, because of existing broadband service, would be ineligible for support in the

[19] "FCC Takes Major Strides Toward Further Expansion of Rural Broadband, Second Phase of Connect America Fund Will Connect Five Million Rural Americans to Broadband," FCC Press Release (April 23, 2014).

[20] *Transformation Order*, ¶¶ 533-38.

[21] *In the Matter of Connect America Fund, ETC Annual Reports and Certifications, Petition of US Telecom for Forbearance Pursuant to 47 U.S.C. § 160(c) from Obsolete ILEC Regulatory Obligations that Inhibit Deployment of Next-Generation Networks*, WC Docket No. 10-90, WC Docket No. 14-58, WC Docket No. 14-192, Report and Order, FCC 14-190 (rel. December 18, 2014).

[22] This determination will be made using 3 Mbps downstream/768 kbps upstream (3 Mbps/768 kbps) as a proxy for this standard, upon completion of the process for determining census block eligibility discussed below.

[23] *December 2014 Connect America Order*, ¶ 4.

bidding process.

Second, the FCC granted forbearance from federal high-cost universal service obligations in areas where price cap carriers are ineligible to receive CAF support because those areas are low-cost, have unsubsidized competition, or are being served by an ETC receiving CAF subsidies.[24] ETCs will remain obligated to maintain existing voice services until and unless they receive FCC authorization to discontinue those services. Moreover, they will remain obligated to provide Lifeline service.[25] In addition, price cap carriers declining Phase II subsidies nevertheless will retain the ETC obligation to offer voice telephony services in those census blocks determined to be high-cost or extremely high-cost, and unserved by an unsubsidized competitor, until such carriers are replaced by other ETCs that are required to offer voice and broadband service to fixed locations that meet the FCC's public service obligations.[26]

Third, the FCC provided "increased flexibility in the build-out requirement, while still ensuring that support recipients are reaching out to Americans that were previously unserved."[27] Specifically, the FCC increased the term of support for price cap carriers from five (5) years to six (6) years, with an option for a seventh year in certain circumstances. The FCC also allowed adjustments of up to five percent (5%) in the number of locations that must be served in an eligible census block, with corresponding support reductions.[28]

III. <u>The High Cost Program Should Not Be Transitioned to Broadband Deployment</u>

The FCC currently anticipates that its final determination as to which areas will be eligible for the offer of Phase II support to price cap ILECs will occur early this year. The Phase II

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[24] *Id.*, ¶¶ 3, 50-70.

[25] *Id.*, ¶ 51.

[26] *Id.*, ¶ 52.

[27] FCC Increases Rural Broadband Speeds Under Connect America Fund, Rural Consumers Must Receive Broadband Delivering At Least 10 Mbps Downloads, 1 Mbps Uploads from Providers Who Benefit from Connect America Support," FCC Press Release (December 11, 2014).

[28] *December 2014 Connect America Order*, ¶¶ 3, 38-44.

competitive bidding process, however, will not occur until 2016.[29] Thus, with respect to the implementation of Phase II, Nebraska and the rest of the nation are in only the beginning stages of a lengthy transition in which carriers are deploying broadband services – with or without public subsidies – phasing out intercarrier charges for network access, and otherwise adjusting their business plans and developing new services. Moreover, the FCC's actions underscore the central theme of universal service reform: that universal service subsidies generally are unneeded and may even be harmful to the development of competitive market forces where market forces are anticipated to provide the broadband and voice services that consumers demand. It is far from clear whether, aside from the legal issues concerning the regulation of and state jurisdiction concerning broadband services, there is a need for states to supplement federal universal service support for price cap carriers with subsidies, whether for broadband or voice services.

Such is particularly the case in low-cost areas or areas subject to unsubsidized competition. CenturyLink has complained that the FCC's decisions will result in "gaps" of service in "relatively low cost" areas that are ineligible for Phase II funding. According to CenturyLink, the FCC's decision to refuse price cap ILECs' proposals to substitute unserved locations in census blocks ineligible for support (because the census blocks are otherwise served) for locations in census blocks eligible for support (because the census blocks are unserved) suggests that states should fund broadband deployment in areas deemed by the FCC to be served.[30] However, while the FCC will explore this issue,[31] there is no legitimate role for public subsidies for broadband deployment to low-cost areas or areas otherwise generally subject to unsubsidized competition. Stated differently, public subsidies to price cap ILECs in such areas would likely harm rather than support the market

[29] *Id.*, ¶¶ 1, 8, 12.

[30] *See, e.g.*, Notice of Communications, In the Matter of a Repository Docket in which to Gather Information about the Lifeline Program and Evaluate the Purposes and Goals of the Missouri Universal Fund, Case No. TW-2014-0012 (Mo. PSC. December 29, 2014).

[31] *December 2014 Connect America Order*, ¶ 44.

forces that otherwise would be attracted to the conditions favorable to providing broadband services to previously unserved locations.

There also is no demonstrable case for converting state universal funds to state broadband deployment funds for use in high-cost areas. In Frontier's and CenturyLink's view, Phase I has been "an overwhelming success."[32] In Phase I, ILECs continued to receive the same levels of federal high-cost funding they have received in previous years, as well as additional amounts for broadband deployment. The FCC only recently adopted the cost model for Phase II and is still in the process of evaluating challenges to model-based support. Just last month the FCC effectively decided to allow competitive ETCs more opportunities to bid for Phase II subsidies. The FCC also has concluded that extremely high-cost areas will be eligible for the Phase II competitive bidding process.[33] In addition, the cost threshold that determines which blocks are extremely high-cost will be adjusted after conclusion of the FCC's evaluation of challenges to areas eligible for Phase II support.[34] Therefore, one cannot conclude that extremely high-cost areas will not be adequately served.

Moreover, many of the changes to the Phase II program announced last month were prompted in large part by price cap ILECs, which advocated for the "increased flexibility" the FCC ultimately decided to grant. Although CenturyLink elsewhere contends that the FCC's allowance of adjustments of up to five percent (5%) in the number of locations that must be served in an area eligible for Phase II subsidies (*i.e.*, so that only ninety-five percent (95%) of locations in a census block need be served) is a reason to demand state broadband subsidies for the unserved locations,[35] CenturyLink advocated such an allowance so that it and other price cap ILECs would have the

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[32] Ex parte submitted to FCC by Frontier Communications and CenturyLink, "CAF Phase II: WC Docket No. 10-90" (October 8, 2014).

[33] *Connect America Fund et al.*, WC Docket No. 10-90 et al., Report and Order et al., 29 FCC Rcd 7051 (rel. June 10, 2014), ¶¶ 30, 32.

[34] *December 2014 Connect America Fund Order*, ¶ 76, n. 173.

[35] *See* footnote 30, *supra*.

"increased flexibility" about which it now complains.[36] While several matters concerning the implementation of CAF remain uncertain, CenturyLink and others have assured that they are ready to invest substantially in broadband deployment based on Phase II funding, including at the 10 Mbps/1 Mbps level.[37] At this point evidence is lacking to indicate that federal funding and the FCC's other reforms are insufficient to subsidize price cap ILECs for broadband deployment, or that if there is a perceived funding shortfall, states should subsidize broadband service rather than basic telephone service, or that, in the case of Nebraska, the NEBP is insufficient to provide targeted assistance.

In brief, the effects ultimately on consumers from broadband and voice service subsidies must be more completely understood before broadband deployment receives additional subsidies. When Phase II is implemented, state regulators and the industry will be able to evaluate quantitatively the effects of the FCC's programs and determine appropriate courses of action with respect to state universal service funding.

Regulators also should bear in mind the burden on ratepayers of expanding universal service programs. The NUSF surcharge currently is a flat 6.95% assessment on all in-state voice services. The federal universal service surcharge for the first quarter of 2015 is 16.8% of a consumer's monthly interstate telecommunications bill. Any proposal that may have the effect of adding to high-cost funding must recognize the significant financial burdens already imposed on ratepayers at a time when consumers are experiencing substantial add-on fees imposed for 911, telecommunications relay service, taxes, and other programs in addition to federal universal service. Notably, other states do not fund broadband deployment through their state high-cost universal

[36] *See, e.g.*, Comments of CenturyLink, filed August 8, 2014 in Connect America Fund, Universal Service Reform – Mobility Fund, ETC Annual Reports and Certifications, Establishing Just and Reasonable Rates for Local Exchange Carriers, Developing an Unified Intercarrier, Compensation Regime, WC Docket No. 10-90, WT Docket No. 10-208, WC Docket No. 14-58, WC Docket No. 07-135, CC Docket No. 01-92.

[37] *See, e.g.*, Ex parte submitted to FCC by Frontier Communications and CenturyLink, *supra*.

service funds. Nebraska reportedly is one of only four states in the nation with a universal service program to fund broadband deployment. Nebraska provides the second greatest amount of total funding among the states with such programs.[38] At the same time, the Commission in a different proceeding (NUSF-100) is determining whether there is a need for changes in the contribution methodology for the NUSF. These facts suggest the Commission should proceed cautiously with respect to broadband deployment subsidization.

Charter is not contending that the Commission should do nothing regarding the NUSF. The Commission can and should align its audit requirements with the CAF by requiring explicit documentation demonstrating funds are being used for their intended purpose. NEBP funds should not be used for overbuilding or funding network improvements in areas served by facilities-based competitors that do not receive subsidies. ETCs should not be able receive funding from both the CAF and the NUSF for the same areas. Other reforms to the NUSF may be appropriate. However, the Commission should not determine in advance of the implementation of Phase II that the High Cost Program should be transformed into a broadband deployment fund or that the subsidies otherwise available through the High Cost Program should be distributed for broadband deployment.

Accordingly, and for the reasons stated, Charter urges the Commission to not transition the High Cost Program or its funding to broadband service subsidization.

Respectfully submitted this 13th day of January, 2015.

By: Kennard B Woods

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[38] 2014 Annual Report, p. 22.

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ATTORNEYS FOR CHARTER FIBERLINK -
NEBRASKA, LLC

CERTIFICATE OF SERVICE

An original and one copy of the foregoing Comments of Charter Fiberlink-Nebraska, LLC are being delivered on January 14, 2015 to the Nebraska Public Service Commission, 1200 N St., Suite 300, Lincoln, NE 68508, and a copy of the same is being been e-mailed on the same date to:

Nebraska Public Service Commission
Sue.Vanicek@nebraska.gov
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Kennard B Woods

Kennard B. Woods