

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Nebraska Public)
Service Commission, on its Own Motion,)
To Administer the Universal Service Fund)
High-Cost Program.)

Application No. NUSF-99
Progression Order No. 2

RECEIVED
DEC 13 2019
Nebraska
Public Service Commission

COMMENTS OF COX NEBRASKA TELCOM, LLC

Cox Nebraska Telcom, LLC ("Cox") hereby files these comments for the Nebraska Public Service Commission's ("Commission") consideration in the above-captioned docket, NUSF-99, P.O. 2. These comments are being filed pursuant to the Commission Order entered herein on November 13, 2019.

While Cox does not receive high-cost support from the Nebraska Universal Service fund ("NUSF"), developing sound processes and procedures regarding the NUSF is critical for all telecommunications companies operating in Nebraska, as it is their residential and business customers who pay into the NUSF. As such, Cox appreciates the Commission for undertaking a review of NUSF-99 to determine whether changes should be made to better align it with NUSF-108 and to look for possible improvements.

To that end, Cox believes an alignment of NUSF-99 with NUSF-108 is logical. A higher degree of uniformity between the price cap and rate-of-return carrier programs would improve clarity and likely optimize the understanding and transparency of the NUSF as a whole. Specifically, Cox supports the following:

- 1) Minimum speed requirements should be 25/3 unless a price cap carrier can provide reasonable justification that such standard is not technically or financially feasible.

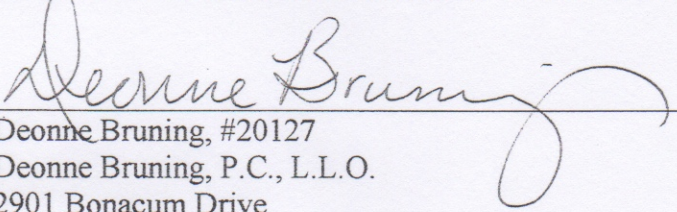
- 2) Prior Commission decisions have sensibly precluded the distribution of NUSF support to areas served by unsubsidized competitors and where carriers receive federal support. To ensure that principle is realized, the Commission must accurately identify areas where funding is eligible using the best data available. While census blocks and the Form 477 represent the best data presently available, the FCC recently established a new digital data collection program that will improve the accuracy and granularity of broadband data. The new process will commence upon USAC's Public Notice announcing the readiness of the platform to accept coverage maps (polygons) from providers. The same Public Notice will establish related reporting deadlines. This new and improved method of data collection should be used by the Commission, as opposed to relying on census blocks.
- 3) Prioritization should focus on unserved areas, followed by underserved areas.
- 4) A two-year completion date for buildout once a project is approved is reasonable, although extensions should be allowed upon the demonstration there are reasonable grounds for delays.
- 5) Cox takes no position on the remaining questions relative to harmonizing NUSF-99 and NUSF-108, or on whether changes should be made in anticipation of possible updates to federal support for the price cap companies.

Finally, Cox has long-advocated the Commission ensure the NUSF is used efficiently, effectively and for intended, approved purposes. The recent Orders entered in NUSF-108 requiring payments post-construction was a tremendous improvement towards improving accountability and transparency. Cox asks the Commission to continue to

keep openness, transparency and accountability as a foremost goal in any changes made to the NUSF-99 support mechanism.

Respectfully submitted this 13th day of December, 2019.

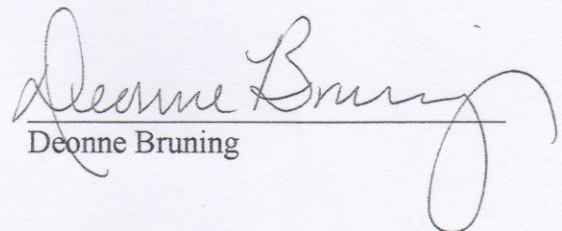
ATTORNEY FOR COX NEBRASKA TELCOM, LLC



Deonne Bruning, #20127
Deonne Bruning, P.C., L.L.O.
2901 Bonacum Drive
Lincoln, NE 68502
(402) 440-1487
deonnebruning@neb.rr.com

Certificate of Service

The undersigned hereby certifies that on this 13th day of December, 2019, an original of the Comments of Cox Nebraska Telcom, LLC in Application NUSF-99, P.O. 2 were hand-delivered to the Nebraska Public Service Commission, 300 The Atrium, 1200 N Street, Lincoln NE and a copy of the same was e-mailed to the Nebraska Public Service Commission and the NUSF-99 service list.



Deonne Bruning