

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Nebraska ) Application No. NUSF-139  
Public Service Commission, on its )  
own motion, to consider appropriate )  
modifications to the high-cost distribution )  
and reporting mechanisms in its Universal )  
Service Fund program in light of federal )  
and state infrastructure grants. )

**IDENTIFICATION AND PRIORITIZATION OF ISSUES**  
**RURAL TELECOMMUNICATIONS COALITION OF NEBRASKA**

The Rural Telecommunications Coalition of Nebraska (“RTCN”)<sup>1</sup>, by and through its undersigned counsel of record, submits the following Identification and Prioritization of Issues in response to the Scheduling Order entered by the Commission on January 22, 2024.

**High Priority (March Workshop)**

- Should the NUSF continue to provide BDS support? If so, under what parameters?
- What requirements should be imposed on carriers for the receipt of ongoing support, and when should such requirements be applied?
- Should the NUSF-EARN Form continue to be utilized by the Commission? If so, what revisions are necessary to ensure that the NUSF-EARN Form accurately reflects the cost to serve? Specifically, what revisions are needed to address fluctuations caused by depreciation recognition?
- Alternatively, should be Commission transition from an accountability model that emphasizes control over a carrier’s earnings to an accountability model that focuses on a carrier’s accomplishment of universal service goals? Would such a transition promote

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<sup>1</sup> For purposes of this proceeding, the RTCN consists of the following carriers: Arapahoe Telephone Company d/b/a ATC Communications; Benkelman Telephone Company, Inc., Cozad Telephone Company, Hartman Telephone Exchanges, Inc., Diller Telephone Company, Southeast Nebraska Communications, Inc., Pierce Telephone Company, and Wauneta Telephone Company.

better efficiency and be more transparent? Should the Commission focus less on earnings and more on results?

- What revisions to the State Broadband Cost Model (SBCM) are required to ensure that the model best accounts for the actual cost to operate and maintain networks?
- Are changes to the delivery of ongoing support necessary to incentivize investment? Specifically, to ensure the stability and predictability of support, should the Commission consider making long term commitments of support to carriers? What requirements should carriers meet to receive such long term commitments of support?

**Lower Priority (Later Workshop)**

- Are current mechanisms for portability of support sufficient or should reforms be considered? If so, what reforms?
- How can the Commission best ensure that rates charged for telecommunications and broadband services are affordable and comparable as required by the NUSF Act?
- Are the Commission's rules related to Carrier of Last Resort obligations (COLR) in need of reform, particularly with respect to the transfer of such obligations?
- With other reforms and changes, does duplication of benefits continue to be a concern? If so, what constitutes the duplication of benefits? How may the Commission's accountability mechanisms be modified to ensure that benefits are not duplicated?

DATED: February 2, 2024

**RURAL TELECOMMUNICATIONS  
COALITION OF NEBRASKA**

**Arapahoe Telephone Company d/b/a  
ATC Communications, Benkelman  
Telephone Company, Inc., Cozad  
Telephone Company, Diller Telephone  
Company, Hartman Telephone  
Exchanges, Inc., Southeast Nebraska  
Communications, Inc., Pierce Telephone  
Company, Wauneta Telephone Company**

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