

SECRETARY'S RECORD, PUBLIC SERVICE COMMISSION

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Nebraska)	Application No. NUSF-139
Public Service Commission, on)	Progression Order No. 4
its own Motion, to consider)	
appropriate modifications to)	ORDER ISSUING FINDINGS AND
the high-cost distribution and)	CONCLUSIONS, SEEKING FURTHER
reporting mechanisms in its)	COMMENT, AND SETTING HEARING
Universal Service Fund program)	
in light of federal and state)	
infrastructure grants.)	Entered: November 6, 2024

APPEARANCES:

For the Nebraska Rural Independent Companies

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For the Commission

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1200 N Street
Lincoln, NE 68508

BY THE COMMISSION:

Background

The Nebraska Public Service Commission ("Commission") initiated this proceeding, on its own motion, on August 29, 2023 ("August 29th Order"), to consider appropriate modifications to the Nebraska Universal Service Fund ("NUSF") high-cost distribution mechanism and associated reporting requirements.¹ On November 28, 2023, the Commission issued its Findings and Conclusions and commenced a challenge process for determining eligible areas for support in calendar year 2024.²

The Commission held a public workshop on March 6, 2024 in the Commission Hearing Room, Lincoln, Nebraska and via WebEx. There, the Department Director and the interested parties had the opportunity to discuss initial positions relative to the priority issues identified by the Commission.

On March 20, 2024 the Commission held a hearing in Lincoln, Nebraska and via WebEx. Subsequently, on July 9, 2024, the Commission entered an order issuing its findings and conclusions relative to two topics. First, the Commission concluded that sustainability of broadband networks should be an explicit goal of the NUSF high-cost program.³ Second, the Commission determined that

¹ *In the Matter of the Nebraska 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, Application No. NUSF-139, ORDER OPENING DOCKET SEEKING COMMENT AND SETTING HEARING (August 29, 2023) ("August 29th Order").*

² *In the Matter of the Nebraska 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, Application No. NUSF-139, Progression Order No. 1, FINDINGS AND CONCLUSIONS ORDER AND ORDER COMMENCING CHALLENGE PROCESS (November 28, 2023) ("November 28th Order").*

³ *See In the Matter of the Nebraska 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, Application No. NUSF-139, Progression Order*

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in light of pending and anticipated infrastructure grants and broadband commitments made through other programs such as the Broadband Equity Access and Deployment ("BEAD"), Capital Projects Fund ("CPF"), the Nebraska Broadband Bridge ("NBBP"), and the Enhanced A-CAM, that it was appropriate to suspend Broadband Deployment Support ("BDS") for 2025.⁴

Also, on July 9, 2024, the Commission entered an order releasing a staff proposal and setting a procedural schedule.⁵ The Commission requested pre-filed direct and rebuttal testimony to be filed by the interested parties and set a hearing date of August 29, 2024. The Commission Staff's Proposal was attached to the Commission's Order as "Attachment A". Pre-filed testimony was filed by Mr. Bachtiyer Kholmatov on behalf of the Nebraska Rural Broadband Alliance ("NRBA"), Mr. Dan Davis on behalf of the Nebraska Rural Independent Companies ("RIC"), Mr. Shaun Barkley on behalf of the Rural Telecommunications Coalition of Nebraska ("RTCN"), Mr. Pat McElroy, on behalf of Northeast Nebraska Telephone Company ("NNTC"), and Mr. Cullen Robbins, NUSF Director for the Commission. Pre-filed Rebuttal Testimony was filed by Mr. Kholmatov on behalf of NRBA, and Mr. Davis on behalf of RIC.

On August 29, 2024, the Commission held a hearing in the Commission Hearing Room in Lincoln, Nebraska and via WebEx. Appearances at the hearing are reflected above. Exhibit Nos. 1-9 were offered and received into the record. Hearing testimony was presented as summarized and restated below.

T E S T I M O N Y

Mr. Cullen Robbins, the Director of the Communications and Nebraska Universal Service Fund Department, testified in support of the Commission staff's proposal. His pre-filed testimony was

No. 2, FINDINGS AND CONCLUSIONS (July 9, 2024) ("July 9th Findings and Conclusions Order") at 18.

⁴ See July 9th Findings and Conclusions Order at 20.

⁵ See *In the Matter of the Nebraska 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*, Application No. NUSF-139, Progression Order No. 3, ORDER RELEASING PROPOSAL AND SETTING PROCEDURAL SCHEDULE (July 9, 2024) ("July 9th Proposal Order").

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offered and received into the record as Exhibit No. 6.⁶ The pre-filed testimony generally described the Commission staff's proposal which was also attached to the Commission's July 9th Proposal Order.⁷ Mr. Robbins also provided an update on the Staff's progress towards finalizing the agreement with CostQuest Associates, LLC, who was hired to update the State Broadband Cost Model ("SBCM") data.⁸ Mr. Robbins stated at the time of the hearing, counsel was finalizing the contractual service documents and the Department had reviewed some initial data provided by CostQuest.⁹ Mr. Robbins could not provide a certain timeframe for when that data would be finalized and made available to the parties.¹⁰ However, Mr. Robbins indicated the Department was working towards providing that information when they could.¹¹

Mr. Bachtiyer Kholmatov, testified on behalf of the Nebraska Rural Broadband Alliance ("NRBA"), Cambridge Telephone Company, and Pinpoint Communications. Mr. Kholmatov offered his pre-filed direct and rebuttal testimony into the record as Exhibit Nos. 2 and 7.¹² He also offered a summary of his testimony as Exhibit No. 9.¹³ Mr. Kholmatov testified in general support of the Commission Staff's Proposal released in the July 9th Proposal Order.¹⁴ He stated there seemed to be a general consensus regarding the transitional path described by the Commission staff for the 2025 distribution model.¹⁵ However, he indicated this support is limited to the 2025 transitional year as the Commission works towards further reform.¹⁶ Mr. Kholmatov also stressed the importance of having access to the CostQuest data inputs.¹⁷ He testified that the NRBA recommended the

⁶ See Hearing Transcript (TR) at 11.

⁷ See generally Exhibit 6.

⁸ TR at 12.

⁹ See *id.* at 15.

¹⁰ *Id.*

¹¹ See *id.* at 16.

¹² See *id.* at 24.

¹³ See *id.*

¹⁴ See *id.* at 26.

¹⁵ *Id.* at 27.

¹⁶ *Id.*

¹⁷ See *id.* at 28.

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Commission retain the NUSF-EARN Form during the 2025 transitional period.¹⁸

Under questioning Mr. Kholmatov also emphasized the need for sufficient ongoing support to maintain the companies' networks.¹⁹ He stated that there is need the need for operational support, support to maintain access to 911, and to have the network services available to all customers regardless of whether a customer takes their service.²⁰ Carriers must also continually maintain their network, fix disruptions, and have resources to make repairs even when fiber has been deployed.²¹

Mr. Dan Davis, a consultant employed by Consortia Consulting, testified on behalf of the RIC members. His testimony was offered and received into the record as Exhibit Nos. 3 and 8.²² Mr. Davis testified that RIC endorsed several policy principles set forth by Mr. Robbins in his testimony.²³ First, RIC agreed that the distribution model should be data driven.²⁴ Second, calculation of support should be understandable and made available to parties for review and comment prior to final Commission approval.²⁵ Third, support distributions should be more predictable year to year.²⁶ RIC recommended that further information be released to the parties regarding federal imputation and proposed model cost calculations.²⁷ Further, Mr. Davis requested the staff provide further detail regarding the proposed rate comparability test.²⁸ Mr. Davis recommended the Commission interpret LB 1031 to continue to provide ongoing support to locations which have a federally enforceable commitment which would include the Enhanced A-CAM

¹⁸ See *id.* at 29.

¹⁹ See *id.* at 41.

²⁰ See *id.*

²¹ See *id.* at 42.

²² See *id.* at 51.

²³ *Id.* at 52.

²⁴ *Id.*

²⁵ *Id.*

²⁶ *Id.* at 53.

²⁷ See *id.*

²⁸ See *id.* at 53-54.

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program.²⁹ RIC members were neutral on the issue of retaining the NUSF EARN Form.³⁰ Mr. Davis recommended the Commission further evaluate the advisability of the continued use of the NUSF EARN Form.³¹ Finally, Mr. Davis testified on the importance of ongoing support to networks that have been built out.³² Mr. Davis indicated that a number of companies take out long-term loans for the purchase of fiber and for deployment costs. These carriers rely on ongoing support to pay down their loans.³³

Mr. Shaun Barkley, one of the Principals at SBW Consulting, LLC, testified for the RTCN. His pre-filed testimony was offered and received into the record as Exhibit No. 4.³⁴ Mr. Barkley testified that RTCN does not object to the use of the NUSF EARN Form in the 2025 transitional year.³⁵ However, RTCN's position is that the Commission should transition away from the NUSF EARN Form in the future.³⁶ Mr. Barkley testified that a number of his clients deployed fiber networks taking out loans and using NUSF support for that purpose.³⁷ Now they are in a position where their equipment is being depreciated out which causes them not to receive as much NUSF support.³⁸ This makes it difficult to pay down debt.³⁹

Mr. Pat McElroy, testified on behalf of Northeast Nebraska Telephone Company ("NNTC"). His pre-filed testimony was offered and received into the record as Exhibit 5.⁴⁰ Mr. McElroy testified that if the Commission plans to do away with the NUSF EARN Form after 2025, there is no reason to keep it in place for 2025.⁴¹ He

²⁹ See *id.* at 54.

³⁰ See *id.* at 56.

³¹ See *id.* at 57.

³² See *id.* at 59.

³³ See *id.*

³⁴ See *id.* at 78.

³⁵ *Id.*

³⁶ See *id.* at 78-79.

³⁷ See *id.* at 80.

³⁸ See *id.*

³⁹ See *id.* at 81.

⁴⁰ See *id.* at 94.

⁴¹ See *id.*

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testified that the NUSF EARN form is fundamentally flawed.⁴² It was intended to incentivize companies to invest in their networks.⁴³ Mr. McElroy stated that is what NNTC has done.⁴⁴ However, he stated, the NUSF EARN Form fails to account for efficiency, particularly for those companies that built out their networks.⁴⁵

Upon questioning, Mr. McElroy testified regarding the importance of ongoing support. He stated that NNTC has continued to upgrade its rings and capacity all through its system.⁴⁶ He stated right now NNTC is on its second generation of units and it is systematically replacing those.⁴⁷ Every year NNTC is replacing three or four towns, and that will be an ongoing process.⁴⁸ Mr. McElroy also stated that NNTC receives calls on a regular basis from bordering residents asking for NNTC to build out service to their homes.⁴⁹ He further stated that carriers like NNTC receive requests from cellular providers to build backhaul to cell towers.⁵⁰

O P I N I O N A N D F I N D I N G S

The Commission enters this order to further refine the Commission's proposed distribution mechanism for determining the allocation of high-cost support in 2025. The Commission considers the 2025 support mechanism to be transitional in nature as the Commission moves through the remaining issues raised in the Commission's August 29, 2023 Order, and which will be handled through additional phases of this proceeding. The Commission emphasizes that more work will need to be done to transition the high-cost distribution support mechanism to account for federal and state infrastructure programs, the sustainability of broadband networks, and to ensure that the affordability goals of the NUSF Act will be met.

⁴² *Id.*

⁴³ *Id.*

⁴⁴ *Id.*

⁴⁵ *See id.* at 95.

⁴⁶ *See id.* at 99-100.

⁴⁷ *See id.* at 100.

⁴⁸ *See id.*

⁴⁹ *See id.* at 101.

⁵⁰ *See id.* at 102.

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Proposal For Comment:

Based on the testimony provided at the Commission's August 29, 2024 hearing in response to the Commission staff's proposal, and the discussion at the public workshop held on October 23, 2024, the Commission finds the structure of the Commission staff's proposal should be largely adopted but the Commission seeks further comment on the specific mechanism for distribution in 2025 as outlined herein.

1. The Commission proposes to continue to provide ongoing support to incumbent local exchange carriers designated as eligible telecommunications carriers and certified for the receipt of high cost support, in high-cost areas⁵¹ where they provide wireline service to a location at speeds of at least 100/20 Mbps and where the location is not served by a wireline competitor providing service at speeds of 100/20 Mbps.

2. The Commission proposes to continue to provide ongoing support to incumbent local exchange carriers designated as eligible telecommunications carriers and certified for the receipt of high cost support, for high-cost areas where they provide service to the location at speeds of 25/3 Mbps provided that such location is subject to a federally enforceable commitment to provide service at speeds of at least 100/20 Mbps, and where the location is not served by a wireline competitor providing service at speeds of 25/3 Mbps.

3. The basis for determining relative costs will be the unmodified CostQuest model output ("2024 SBCM"), as described in the workshop held on October 23, 2024.

4. In 2025, eligible locations would include only those within their Incumbent Local Exchange areas that meet the required speed capability. However, the Commission would plan to evaluate mechanisms for supporting served locations that are outside of an

⁵¹ The Commission plans to retain the current defining characteristics of high-cost areas which are defined according to census blocks with the following: 1) less than 20 households; 2) less than 42 households per square mile; and 3) not part of a census designated city or village. High-cost areas will continue to include locations that fit the rurality characteristics even though they are located outside of the state but are served from a central office located in Nebraska.

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ILEC area once the framework is in place for transitioning Carrier of Last Resort ("COLR") obligations and porting of NUSF support. High-cost support budgeted but not distributed through the 2025 transitional high-cost mechanism may be directed to such locations during 2025, if an acceptable framework has been adopted.

5. The data inputs would include the following: CostQuest Cost Model data (updated "2024 SBCM" data); Broadband Data Collection ("BDC") wireline availability data; the Federal Communications Commission's ("FCC's") published Enhanced A-CAM location list; the FCC's published A-CAM area definition; federal universal service fund disbursements for the following programs: Enhanced A-CAM support, A-CAM support, Broadband Loop Support ("CAF-BLS"), and High Cost Loop Support ("HCLS"); the high-cost area definition shapefile; and the exchange boundary data provided to CostQuest in June of 2024.

6. The cost base of an eligible location will consist of the sum of capital and ongoing expenditures ("CapEx" and "OpEx", respectively) less the funding threshold of \$63.69 and less imputed federal support.⁵²

7. The support base for each eligible carrier will consist of two categories of locations. First, all 100/20 Mbps capable locations without a wireline competitive 100/20 Mbps service to the location will be eligible for support. Second, all 25/3 Mbps capable locations subject to a federally enforceable commitment without wireline competitive 25/3 Mbps service will continue to be eligible for support.⁵³ The following programs will be treated as federally enforceable commitments: RDOF, USDA Reconnect, and Enhanced A-CAM. With respect to locations which are served at 25/3 Mbps and subject to a federally enforceable commitment, the carrier must demonstrate to the Commission that it is in compliance with the deployment obligation of the federally enforceable commitment.

⁵² The \$63.69 threshold is the revenue benchmark the FCC utilizes in the Enhanced A-CAM mechanism as a funding threshold utilized to account for estimated revenues that a carrier could reasonably obtain from end-users. This figure is based on a benchmark rate of \$90.98, taken from a 2023 Urban Rate Survey, and multiplied by a 70% take rate.⁵²

⁵³ See Neb. Rev. Stat. § 86-324.02(2)(a).

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Such demonstration will include an affidavit of the carrier, as well as data to substantiate build-out milestones are being met.

8. The cost base would consist of both the CapEx and OpEx portions of modeled support. After determining the monthly cost for the location and deducting the revenue benchmark of \$63.69, the Commission proposes to assign and impute federal support received during the prior calendar year. The Commission proposes to impute federal support as follows:

a. General federal support (support that is not directed to specific locations and areas) will be imputed on a location level from the cost to serve, proportionately to the location cost base (OpEx + CapEx - \$63.69) in the total cost base of the incumbent carrier.

b. Targeted federal support (support that is directed to specific locations and areas) will be imputed on a location level from the cost base of the supported locations of the incumbent.

c. If the specific support amount of the location is unknown, a recalculated support amount using updated 2024 SBCM and federal program parameters will be used to proportionately impute federal support. Recalculated support will only serve to provide weights for assigning support and the imputation will use only actual support disbursements.

d. If the targeted federal support exceeds the recalculated amount, the amount in excess of the recalculated support will be imputed proportionately to the remaining cost base of the location.

e. Targeted support will not be imputed in excess of the location cost base.

f. If the targeted federal support exceeds the cost base of supported locations, any excess amount will be imputed as general support.

g. Federal support types included in the imputation calculation would be:

i. General support: HCL, BSL

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ii. Targeted support: A-CAM, Enhanced A-CAM

h. Intercarrier Compensation support will be excluded from the federal imputation calculation.

i. The list of federal support types to be imputed may be revised to include new types of support.

j. All Federal support imputation will use previous calendar year disbursements.

9. For 2025, the Commission would not conduct its own challenge process but would rely on the FCC's BDC data. The Commission would use the most recent BDC data available and would publish specific data sets used in its support determination. The dataset used to develop the proposal contained herein utilizes BDC availability data as of December 31, 2023.⁵⁴ The Commission would only consider wireline BDC service records in determining where service exists.

10. The support base will consist of the eligible cost base aggregated to the company level. The upper limit (cap) of ongoing support for rate-of-return carriers will be the lesser of the support base and the eligible earnings. For price cap carriers, the upper limit will equal the support base. The initial support allocation will be made based on the proportion of the carrier's support base to the total support base, not to exceed the upper limit. Unallocated support will be redistributed proportionately until all of the budget is distributed, or until the upper limit of all the carriers' support eligibility is reached. Carriers would, at a minimum, receive glide path support equal to 75 percent of the 2024 ongoing NUSF support. The upper limit will not apply to the glide path support - i.e. - glide path support will not be limited by eligible earnings.

11. The Commission proposes to continue to utilize the NUSF EARN Form process to determine earnings caps for rate-of-return carriers in 2025 while it further considers whether to eliminate or replace the NUSF-EARN Form mechanism. However, the Commission

⁵⁴ As the FCC makes continual updates to the BDC data with regard to challenges, the Commission will release the version of the downloaded dataset used for the determination of eligible areas along with the proposed and final model results.

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will use a one-year period where such a determination would benefit the carrier.

12. With respect to price cap carriers, the Commission proposes to utilize a rate comparability metric to ensure that the comparability and affordability goals of the NUSF Act are met. Consistent with the Commission Staff's prior proposal, the Commission proposes to use a rate benchmark of \$92.24, where rates charged for voice capable broadband service at 100/20 Mbps must fall under that benchmark.⁵⁵ To meet this threshold eligibility requirement, price cap carriers will be required to provide an annual certification and provide documentation of comparable rates charged in rural and urban areas for services offered.⁵⁶ Price cap carriers who cannot certify that their rates statewide fall under the benchmark will not be eligible for NUSF support. Additionally, for ongoing support to be received in 2025, price cap carriers will continue to be subject to the requirements used in 2024 as a condition for ongoing support. Specifically, price cap carriers will be required to file a breakdown of how ongoing support will be used. Ongoing support may be used for the following expenses:⁵⁷

<u>Category</u>	<u>Cost</u>
Service Technicians	Wages
Service Technicians	Transportation
Equipment	Electronics

⁵⁵ See <https://docs.fcc.gov/public/attachments/DA-23-1172A1.pdf>.

⁵⁶ The Rate Comparability and Affordability Certification must be provided via a Commission-prescribed form with sufficient documentation which shows the rates charged for services in rural areas are affordable and reasonably comparable with the rates charged in urban areas on an exchange by exchange basis. The form will be released with the final order approving allocations for 2025. In addition, the Commission plans to update its payment audit requirements in a separate proceeding to include a third-party review of the Commission's standards in light of changes adopted by the Commission in this docket.

⁵⁷ This list encompasses the allowable uses for ongoing support used in 2024. See *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, ORDER AUTHORIZING PAYMENTS AND SETTING PROJECT SELECTION DEADLINE (January 23, 2024).

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Equipment	Replacement Cards
Equipment	Switch Upgrades
Equipment	Conduit
Equipment	Fiber repair
Transmission	Transmission
Generators	Generators
Network Security	Network Security
Customer Service (if located in the state)	Customer Service

13. The distribution model will be revised during the year to account for: NUSF EARN Form updates, USAC disbursement updates, revisions to the FCC's list of Enhanced A-CAM supported locations, and BDC service availability data updates. The model and resulting distribution amounts may also be revised to include corrections if any methodological issues are discovered.

14. Attachment "A" to this Order incorporates the foregoing proposal elements and is a reflection of an initial version of the high-cost distribution for 2025. The amounts reflected therein should not be relied upon as a final version of the distribution model. The Commission plans to incorporate the most up to date BDC data for the actual distribution of support in 2025. Changes or corrections may also be made after internal reviews and consideration of the comments and hearing testimony.

15. During the transitional year, the Commission plans to solicit further comment on the process and timeline for making adjustments to account for inflation, BDC fabric updates, as well as boundary changes approved after the June 2024 update provided to CostQuest.⁵⁸

⁵⁸ The Commission plans to consider appropriate revisions to its annual eligible telecommunications carrier (ETC) certification process, in NUSF-66, to account for findings ultimately adopted in this docket.

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Comment Period:

Interested parties may file comments in response to the proposed 2025 transitional high-cost distribution mechanism on or before **November 25, 2024** at 5:00 p.m., Central Time. Comments should be submitted electronically to the Commission at psc.nusf@nebraska.gov. Interested parties shall also electronically serve a copy of their comments to the service list which consists of counsel for the entities filing comments on previous occasions and counsel entering appearances at the Commission's hearing held on August 29, 2024.

Hearing:

A hearing in this matter will be scheduled for **Thursday, December 5, 2024 at 10:00 a.m., Central Time**, in the Commission Hearing Room, 300 The Atrium Building, 1200 N Street, Lincoln, Nebraska 68508 and via WebEx. The hearing will be held in legislative format. The Commission strongly encourages witnesses providing testimony at the hearing to attend in person rather than appearing remotely. If auxiliary aids or reasonable accommodations are needed for attendance at the meeting, please call the Commission at (402) 471-3101. For people with hearing/speech impairments, please call the Nebraska Relay System at (800) 833-7352 (TDD) or (800) 833-0920 (Voice). Advance notice of at least seven days is needed when requesting an interpreter.

O R D E R

IT IS THEREFORE ORDERED by the Nebraska Public Service Commission that the foregoing proposal and Attachment "A" is hereby released for public comment.

IT IS FURTHER ORDERED that interested parties may file comments in response to the Commission's proposal and Attachment "A" to this Order on or before **November 25, 2024 at 5:00 p.m.**, Central Time, in the manner prescribed above.

IT IS FURTHER ORDERED that a hearing on the Commission's proposal set forth herein and Attachment "A" will be held on **Thursday, December 5, 2024, at 10:00 a.m., Central Time**, in the Commission Hearing Room, 300 The Atrium Building, 1200 N Street, Lincoln, Nebraska 68508 and via WebEx as provided above.

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ENTERED AND MADE EFFECTIVE at Lincoln, Nebraska this 6th day
of November, 2024.

NEBRASKA PUBLIC SERVICE COMMISSION

COMMISSIONERS CONCURRING:

Eric M. Hamler

[Signature]

Tim Schram

Kevin Stocker

[Signature]

Chair

ATTEST:

Thomas W. Golden
Executive Director

Attachment A

Company	Support Base	Glide Path Support	3 year	1 year	Eligible Earnings	Upper Limit	Proposed Distribution
Arlington Telephone Co.- Huntel Systems	\$ 1,392.85	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
ATC Communications	\$ 2,089,456.87	\$ 93,799.08	\$ 354,369.27	\$ 456,438.50	\$ 456,438.50	\$ 456,438.50	\$ 456,438.50
Benkelman Telephone Co., Inc.	\$ 1,938,931.51	\$ 467,643.70	\$ 610,813.52	\$ 1,077,487.00	\$ 1,077,487.00	\$ 1,077,487.00	\$ 1,077,487.00
Blair Telephone Co. - Huntel Systems	\$ 2,192.20	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cambridge Telephone Company	\$ 191,522.99	\$ 334,375.30	\$ 529,143.49	\$ 688,090.00	\$ 688,090.00	\$ 191,522.99	\$ 334,375.30
CenturyLink - NE	\$ 681,184.70	\$ 187,700.43	NA	NA	NA	\$ 681,184.70	\$ 681,184.70
Citizens	\$ -	\$ 278,712.75	NA	NA	NA	\$ -	\$ 278,712.75
Consolidated Teleco, Inc.	\$ 1,177,106.96	\$ 55,394.84	\$ 364,527.44	\$ 598,378.00	\$ 598,378.00	\$ 598,378.00	\$ 598,378.00
Consolidated Telecom, Inc.	\$ 781,585.37	\$ 168,358.06	\$ 889,673.48	\$ 851,037.00	\$ 889,673.48	\$ 781,585.37	\$ 781,585.37
Consolidated Telephone Company	\$ 6,579,276.71	\$ 422,940.82	\$ 1,079,393.78	\$ 1,635,136.00	\$ 1,635,136.00	\$ 1,635,136.00	\$ 1,635,136.00
Cozad Telephone Company	\$ -	\$ 138,082.27	\$ 1,119,473.76	\$ 951,653.00	\$ 1,119,473.76	\$ -	\$ 138,082.27
Curtis Telephone Company	\$ 748,068.33	\$ 227,870.64	\$ 773,269.35	\$ 758,056.50	\$ 773,269.35	\$ 748,068.33	\$ 748,068.33
Dalton Telephone Company	\$ 924,637.89	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Diller Telephone Company	\$ 740,073.92	\$ 344,586.43	\$ 809,935.24	\$ 829,727.00	\$ 829,727.00	\$ 740,073.92	\$ 740,073.92
Eastern Nebraska Telephone Co.	\$ 1,305,295.49	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Elsie Communications, Inc.	\$ 215,069.05	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Glenwood Network Services, Inc.	\$ 554,344.66	\$ 291,662.02	\$ 287,687.64	\$ 493,146.89	\$ 493,146.89	\$ 493,146.89	\$ 493,146.89
Glenwood Telephone Membership Corporation	\$ 2,400,016.74	\$ 1,690,244.71	\$ 2,036,772.60	\$ 1,776,317.32	\$ 2,036,772.60	\$ 2,036,772.60	\$ 2,036,772.60
Great Plains Communications, Inc.	\$ 6,662,973.62	\$ 2,780,406.42	\$ 30,729,381.94	\$ 38,837,352.50	\$ 38,837,352.50	\$ 6,662,973.62	\$ 6,662,973.62
Hamilton Telephone Co.	\$ 1,756,986.06	\$ 619,493.04	\$ 2,189,366.55	\$ 2,720,477.38	\$ 2,720,477.38	\$ 1,756,986.06	\$ 1,756,986.06
Hartington Telecommunications Co., Inc.	\$ -	\$ 274,860.72	\$ 412,223.66	\$ 485,228.80	\$ 485,228.80	\$ -	\$ 274,860.72
Hartman Telephone Exchanges, Inc.	\$ 1,515,397.07	\$ 393,405.59	\$ 707,868.77	\$ 669,966.00	\$ 707,868.77	\$ 707,868.77	\$ 707,868.77
Hemingford Cooperative Telephone Company	\$ 1,786,576.15	\$ 793,055.04	\$ 991,261.58	\$ 953,636.50	\$ 991,261.58	\$ 991,261.58	\$ 991,261.58
Henderson Cooperative Telephone Co.	\$ 88,708.63	\$ 300,478.72	\$ 533,592.20	\$ 512,251.00	\$ 533,592.20	\$ 88,708.63	\$ 300,478.72
Hershey Cooperative Telephone Company	\$ 571,654.70	\$ 291,767.43	\$ 367,725.92	\$ 303,668.71	\$ 367,725.92	\$ 367,725.92	\$ 367,725.92
Hooper Telephone Company DBA Westel System	\$ 718,841.54	\$ 1,535.83	\$ 77,766.77	\$ 99,677.00	\$ 99,677.00	\$ 99,677.00	\$ 99,677.00
K&M Telephone Company, Inc.	\$ 402,979.74	\$ 54,126.52	\$ 172,853.58	\$ 223,670.00	\$ 223,670.00	\$ 223,670.00	\$ 223,670.00
Nebraska Central Telephone Company	\$ 5,980,598.17	\$ 1,368,961.43	\$ 3,183,898.87	\$ 4,635,996.08	\$ 4,635,996.08	\$ 4,635,996.08	\$ 4,635,996.08
Northeast Nebraska Telephone Company	\$ 9,745,779.92	\$ 335,031.20	\$ 96,547.23	\$ 822,192.32	\$ 822,192.32	\$ 822,192.32	\$ 822,192.32
Pierce Telephone Company, Incorporated	\$ 450,299.49	\$ -	\$ 592,231.36	\$ 1,392,843.00	\$ 1,392,843.00	\$ 450,299.49	\$ 450,299.49
Plainview Telephone	\$ -	\$ 306,151.53	\$ 607,558.11	\$ 675,504.50	\$ 675,504.50	\$ -	\$ 306,151.53
Qwest Corporation	\$ 1,832,902.05	\$ 673,258.24	NA	NA	NA	\$ 1,832,902.05	\$ 1,832,902.05
Rock County Telephone Co.	\$ 781,344.62	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Sodtoun Communications, Inc.	\$ 434,977.02	\$ -	\$ -	\$ 11,557.00	\$ 11,557.00	\$ 11,557.00	\$ 11,557.00
Southeast Nebraska Telephone Company	\$ 1,171,184.06	\$ 371,185.97	\$ 779,741.55	\$ 984,257.00	\$ 984,257.00	\$ 984,257.00	\$ 984,257.00
Stanton Telecom, Inc.	\$ 264,596.36	\$ 378,543.45	\$ 772,483.48	\$ 741,181.50	\$ 772,483.48	\$ 264,596.36	\$ 378,543.45
Three River Telephone Company	\$ 5,128,199.39	\$ 1,217,740.02	\$ 1,576,414.59	\$ 1,185,171.84	\$ 1,576,414.59	\$ 1,576,414.59	\$ 1,576,414.59
Wauneta Telephone Company	\$ 1,219,490.21	\$ 290,299.75	\$ 467,982.86	\$ 490,284.00	\$ 490,284.00	\$ 490,284.00	\$ 490,284.00
Windstream Nebraska, Inc.	\$ 3,058,305.07	\$ 475,828.52	NA	NA	NA	\$ 3,058,305.07	\$ 3,058,305.07