



October 7, 2019

Ed Toner
CIO State of Nebraska
Chairman, Nebraska Rural Broadband Taskforce
501 South 14th Street, 4th Floor
Lincoln, NE 68509

Dear Mr. Toner:

Windstream is one of three price-cap carriers in Nebraska. As such, it receives support from the Nebraska Universal Service Fund. Windstream, therefore, is acutely impacted by the Nebraska Rural Broadband Task Force's (Task Force) recommendations and submits the following comments in response.

Comments

Funding

Windstream and the Task Force are aligned in our goals of providing high speed internet access to rural customers in Nebraska. Wireless technology improvements have spurred increased speed capabilities over the past several years. Windstream has and is currently making investments to serve our customers with broadband. Within the next two years, Windstream plans to significantly invest in rural areas with the deployment of over one hundred fixed wireless towers and both trenched fiber and aerial fiber over-builds. The towers will serve Windstream customers with speeds up to 100 Mbps. Windstream also plans to deploy a millimeter wave technology via 24 and 28 Ghz spectrum throughout most of eastern Nebraska. However, in order to accomplish these goals, broadband funds must be made available for all technology types.

Windstream supports the Task Force's recommendation that grant funding to providers is the best mechanism to achieve the goal of better broadband deployment to rural areas. Areas that currently do not have 25/3 Mbps service should be prioritized and not inhibited by carriers that are providing a lesser speed service. Grant funding would allow the state to deploy funding to the unserved and under-served areas and would be the quickest way to achieve the goal of having the entire state covered by at least 25/3 Mbps service.

Mapping

Windstream also concurs with the Task Force's finding that the current state and federal broadband mapping efforts, based on Form 477 data, likely overstate broadband coverage and need to be improved. Leveraging federal data collection efforts will be less costly for the state and will provide greater consistency. Therefore, Windstream recommends that any reforms by the Public Service Commission, related to change in funding mechanisms, whether it be by reverse auctions,

or otherwise, should occur after the Federal Communications Commission completes its Digital Opportunity Data Collection (National Broadband Map) and the Phase II Rural Digital Opportunity Fund Auction has concluded. It's important to wait on major reforms until after the FCC's auction is complete, not just the mapping project because only after the auction will we know what areas of the state are not being addressed by federal funding. Windstream agrees with the Task Force's recommendation that the existing prohibition on retail provision of broadband service by public entities be retained.

Public-Private Partnerships

Public-Private Partnerships are an excellent way communities and companies can leverage better and faster service in unserved and underserved areas. The form of the public-private partnerships can take any shape. Such projects should seek to use assets that are in the ground and not spur development of assets that are outside of a leasing arrangement.

Windstream greatly appreciates the work of the Task Force and the opportunity to comment on its proposed recommendations.

Sincerely,

A handwritten signature in black ink, appearing to read 'Trent Fellers', written over a horizontal line.

Trent Fellers
Vice President of Government Affairs