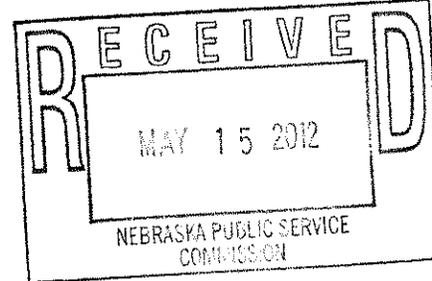


BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Commission, on its own)
motion, seeking to investigate and establish one)
time distribution of funds for equipment and)
software pursuant to the Enhanced Wireless)
Services Act, Neb. Rev. Stat. § 86-442 et seq.)

Application No. 911-056/PI-184



**COMMENTS
OF
N.E. COLORADO CELLULAR, INC.
d/b/a VIAERO WIRELESS**

N.E. Colorado Cellular, Inc., d/b/a Viaero Wireless (“Viaero”), by and through its counsel and pursuant to the Nebraska Public Service Commission’s (the “Commission’s”) Order Opening Docket, Seeking Comment, and Setting Hearing dated April 24, 2012 (the “Order”) in the above-referenced docket, is pleased to provide the following Comments.

I. INTRODUCTION

Viaero is a wireless carrier under Neb. Rev. Stat. § 86-456. Viaero provides interstate telecommunications services as defined in 47 U.S.C. § 254(d) and 47 C.F.R. § 54.5 and was designated an Eligible Telecommunications Carrier (“ETC”) by Commission Order entered on October 18, 2005 in Application C-3324.

II. VIAERO GENERALLY SUPPORTS THE COMMISSION’S PROPOSAL TO “ADVANCE” CERTAIN PSAP FUNDING TO SUPPORT COSTS OF FUTURE EQUIPMENT AND SOFTWARE PURCHASES AND UPGRADES.

Viaero generally supports the Commission’s proposal to use a portion of the current Enhanced Wireless 911 Fund to provide a one-time payment to be made to PSAPs to be set aside for future equipment and software purchases or upgrades and to be used as “advances” for equipment and software expenditures which would be later deducted from the regular monthly payment from the Enhanced Wireless 911 Fund. It is essential that PSAPs be in a position to

purchase, install and operate necessary upgrades for equipment and software required for NextGen capable operation and to replace equipment that will no longer be supported by its manufacturer.

As the WSP industry aggressively moves to deploy 4G and NextGen 911 services, it is of paramount importance that PSAPs are properly equipped and have the technical capability of receiving, interpreting, processing and managing E-911 NextGen 911 communications. Given the Commission's policy mandate to WSPs to deploy broadband and Next Gen capable networks, the PSAPs must be in a position to handle this new technology. Clearly, the issue of adequate training for PSAP personnel becomes critical in the management of a rapidly expanding NextGen wireless network throughout the state. The Commission's proposed strategy to facilitate the funding of needed PSAPs equipment and software is a valuable tool for the PSAPs to achieve this urgent objective.

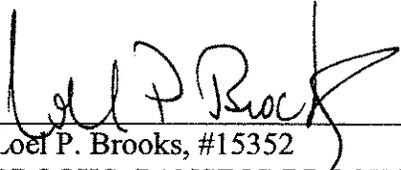
III. VIAERO ENCOURAGES THE COMMISSION TO FORMULATE A PLAN FOR DEPLOYING WIRELESS NEXTGEN IN THE STATE

Given the policy mandate of the Commission to deploy NextGen throughout the state, Viaero believes that the Commission should formulate a plan addressing the funding of wireless NextGen 911 throughout Nebraska. Clearly PSAPs are and will continue to face the challenge of upgrading their systems to make them NextGen capable. So too in the WSP industry, and significant expenditures will be needed to upgrade systems and infrastructures to support NextGen 911 services and to coordinate the delivery of such services to PSAPs throughout the state. How will the Commission address the costs and planning necessary for the deployment of NextGen 911 for wireless and wireline services? The need for a thoughtful and coordinated plan, which addresses governance, funding practices and network components of a new and

robust NextGen network is critical and in the public interest. Viaero stands ready to support any Commission effort to develop such a comprehensive plan.

Respectfully submitted this 15th day of May, 2012.

**NE COLORADO CELLULAR, INC.,
d/b/a VIAERO WIRELESS**

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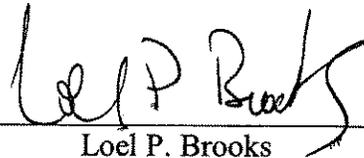
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 15th day of May, 2012, an original, five copies and an electronic copy of the Comments of N.E. Colorado Cellular, Inc., d/b/a Viaero Wireless, in Application No. 911-056/PI-184 were delivered to:

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