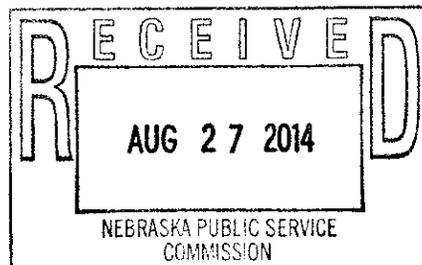


BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Nebraska Public Service Commission, on its own motion, seeking to investigate and determine whether additional funds from the Enhanced Wireless 911 Fund should be made available to public safety answering points for costs to implement text to 911 solutions.)

) Application No. 911-060/PI-191
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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, hereby provides the following comments in response to the Nebraska Public Service Commission’s (the “Commission’s”) Progression Order No. 1 Seeking Comment, and Establishing Schedule (“Progression Order No. 1”).

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 BELIEVES THAT THE COMMISSION NEEDS TO DEVELOP A STATEWIDE PLAN FOR THE IMPLEMENTATION OF TEXT-TO-911 TO ENSURE THAT THERE IS A UNIFORM SYSTEM IMPLEMENTED STATEWIDE

Viaero believes the Commission needs to establish a statewide plan and policy for the implementation of text-to-911 before funding is awarded for ad-hoc, case-by-case text-to-911 solutions. Viaero believes that providing funding outside the cost model for text-to-911 solutions on a case-by-case basis will simply fund temporary solutions, without uniformity as to technology or operational features, that will result in confusing and inconsistent service solutions

and a patch work of independent, uncoordinated and ineffective services, none of which will meet common consumer expectations. This will promote stranded investments and confusing technical and consumer utilization requirements from jurisdiction to jurisdiction. Further, such ad-hoc solutions will likely need to be replaced in short order to conform with the new statewide NG911 system contemplated in the recent Legislative NG911 Study. Rather, fundamental decisions need to be made by the Commission at the state level before individual PSAPs, or other stakeholders in the text-to-911 solution, are permitted to seek reimbursement from the Commission. This Progression Order shows that there are a lot of questions and a lot of unknowns that need to be answered before any plans to reimburse PSAPs for text-to-911 costs are implemented.

The first and most fundamental issue the Commission should address is which text-to-911 technology solution is going to be implemented in Nebraska. The Commission should begin its analysis of this issue by evaluating the costs for each solution for the PSAPs, wireless carriers, and all other involved vendors. Rather than seeking comments, Viaero would propose that the Commission issue a request for proposals for each text-to-911 technology solution for implementation on a statewide basis. This would result in uniform technology implementation across the state, and will also permit the Commission to control the costs of the delivery of text-to-911 for the entire State. The Commission can control and maintain a uniform standard of delivery which will allow all parties to the process to avoid excessive costs and technical integration problems because every PSAP and wireless carrier will be using the same technology and the same vendors.

From a practical standpoint, implementing one technology that is dictated by the state also eliminates the possibility of a PSAP having to contend with wireless carriers implementing

more than one solution resulting in the PSAP having to accommodate not just one text-to-911 solution, but numerous solutions. Streamlining the technology works to everyone's advantage and avoids PSAPS having to patch together multiple technologies. Adoption of a single technology also permits uniform training for PSAPs and education for the public.

From a funding perspective, a uniform system would also result in the lowest costs to the Enhanced Wireless 911 Fund. Established vendors that provide the equipment to the PSAPs and could seek reimbursement directly from the Commission, which would streamline the process and avoid having each PSAP account for expenditures. It would also permit the Commission to perhaps create a model and system for the future implementation of Next Generation 911.

III. CONCLUSION

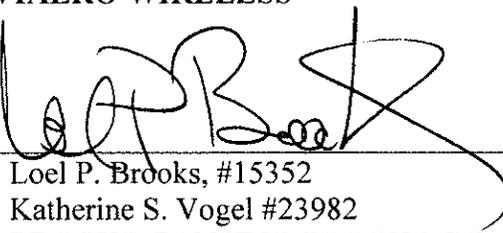
Viaero urges the Commission to avoid the implementation of an ad-hoc limited funding system outside the current funding structure. Such a program is destined to provide ineffective results at higher costs without technological or operational uniformity. The Commission's best efforts should be focused on driving the development of a uniform, interoperable, statewide system to ensure uniform service quality and consumer utilization expectations.

Viaero looks forward to providing further comment and analysis as this Docket progresses.

Respectfully submitted this 27th day of August, 2014.

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

By



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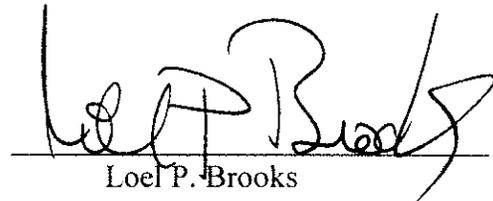
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 27th day of August, 2014, 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. 911-060/PI-191 were delivered to:

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