

**Direct Testimony**

**Of**

**Scott Bohler**

**For**

**CITIZENS TELECOMMUNICATIONS COMPANY OF NEBRASKA**

**d/b/a FRONTIER COMMUNICATIONS OF NEBRASKA**

In the Matter of the  
Petition of the Nebraska Telecommunications Association for  
Investigation and Review of Processes and Procedures  
Regarding the Nebraska Universal Service Fund.

Application No. NUSF-77.9

September 27, 2013

1 **Q. Please state your name and business address.**

2 A. My name is Scott Bohler. My business address is 2378 Wilshire Boulevard,  
3 Mound, Minnesota, 55364.

4 **Q. On what company's behalf is this testimony submitted?**

5 A. This testimony is submitted on behalf of Citizens Telecommunications Company  
6 of Nebraska, d/b/a Frontier Communications of Nebraska ("Frontier").

7 **Q. What is your position and what are your areas of responsibility for Frontier?**

8 A. I am a manager of government and external affairs for the central region of the  
9 Frontier Communications companies. I have responsibility for state regulatory  
10 issues including: local service tariffs; regulatory compliance; regulatory policy;  
11 and state universal service matters.

12 **Q. Please summarize your educational background.**

13 A. I received a B.S. in Mining Engineering from the University of Missouri-Rolla  
14 (currently, Missouri University of Science and Technology).

15 **Q. Please summarize your background in the telecommunications industry.**

16 A. I was a member of the staff of the New York Public Service Commission,  
17 beginning in 1985 and continuing until 1998. In 1998, I joined Citizens  
18 Communications, predecessor to Frontier Communications. At Frontier, I have  
19 handled state regulatory affairs in several states, including Nebraska.

20 **Q. Frontier filed two project applications for funding in this docket. Can you**  
21 **briefly describe those two projects, and their impact on customers?**

22 A. Yes, Frontier has submitted two project applications. Project 1 involves the  
23 Republican City, Naponee, and Bloomington exchanges. Frontier will build  
24 additional facilities to increase the transport capacity linking the exchanges of  
25 Republican City, Naponee, and Bloomington with existing facilities in Frontier's  
26 Alma exchange. The construction of the new buried fiber optic cable and  
27 associated electronics will allow for the provision of increased speed of  
28 broadband services provided in the Republican City, Naponee, and Bloomington  
29 exchanges. Speeds provided will be a minimum of 4 mbps download and 1 mbps  
30 upload in the three exchanges. Faster speeds can be provided, upon customer  
31 request.

32 Project 2 involves the Miller and Sumner exchanges. Frontier will build  
33 additional facilities to increase the transport capacity linking the exchanges of  
34 Miller and Sumner with existing facilities in Frontier's Kearney exchange. The  
35 construction of the new buried fiber optic cable and associated electronics will  
36 allow for the provision of increased speed of broadband services provided in the  
37 Miller and Sumner exchanges. Speeds provided will be a minimum of 4 mbps  
38 download and 1 mbps upload in the three exchanges. Faster speeds can be  
39 provided, upon customer request.

40 **Q. Charter Communications has filed a protest with respect to Project 2, the**  
41 **Miller/Sumner project. Can you explain the basis for their protest, as you**  
42 **understand it?**

43 A. Charter asserts that they currently provide broadband service in some of the  
44 census blocks to be impacted by Frontier’s project and requests that the  
45 Commission “deny the applicants’ requests for NEBP funding in those census  
46 blocks currently served by Charter”<sup>1</sup>. Charter provides service within the town  
47 areas of Miller and Sumner but, based upon Frontier’s inspections, their facilities  
48 do not extend beyond to serve rural areas.

49 **Q. Does the fact that Charter may serve a portion of the area of Frontier’s**  
50 **project automatically disqualify Frontier’s project?**

51 A. No. As Staff has explained in its recommendations, there are a number of factors  
52 that are weighed in the ranking algorithm. One of those factors looks at the  
53 proportion of unserved/underserved areas in each project. But, there are other  
54 factors as well. The Staff recommendations and the Commission’s final decisions  
55 are based on the totality of all the factors taken together.

56 **Q. Does Frontier’s Project 2 only address the town areas of Miller and Sumner;**  
57 **that is, the area where Charter asserts it provides broadband?**

58 A. No, Frontier’s project will be much broader in geography than just the town areas.  
59 The project will impact rural areas that are outside the scope of Charter’s  
60 facilities. Thus, rural households in the exchanges will be positively impacted by  
61 the project; households that are not currently within the service area of Charter.

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<sup>1</sup> Charter Protest, page 3.

62 **Q. Is it possible to revise Frontier's Project 2 so as to somehow exclude the town**  
63 **areas of Miller and Sumner, and only include the rural areas?**

64 A. No, Frontier's project will expand the transport capacity for the entirety of the  
65 Miller and Sumner exchanges. There isn't a feasible way to limit access to that  
66 capacity to only certain census blocks or certain customers within the exchanges.

67 **Q. Does this conclude your testimony?**

68 A. Yes, it does.