

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

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 Progression Order No. 9
COMMENTS OF QWEST CORPORATION d/b/a CenturyLink QC and UNITED TELEPHONE COMPANY OF THE WEST d/b/a CENTURYLINK	

The Nebraska Public Service Commission (“Commission”) established the Nebraska Broadband Pilot Program (“NEBP”) to provide support for broadband deployment in unserved and underserved areas of the state. With this Progression Order, the Commission requests comments from interested parties on the establishment of caps on NEBP support that can be received for the 2014 support year and for each support year going forward. Qwest Corporation d/b/a CenturyLink QC and United Telephone Company of the West d/b/a CenturyLink (collectively “CenturyLink”) respectfully provide these comments in response to the Commission’s request.

The Commission observes that, for the 2013 support year, it received applications for NEBP support that, in total, far exceeded the available funding. The fact that the Commission received so many applications for funding, and at a total amount that was more than triple the available funding, shows that a great need exists for support for broadband deployment projects in high cost areas of the state. These projects likely would not be undertaken if it were not for the Commission’s NEBP

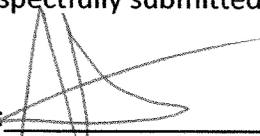
program. CenturyLink greatly appreciates the Commission's dedication to ensuring that all Nebraskans have access to broadband service at sufficient speeds.

CenturyLink is concerned, however, that implementing caps on NEBP support that can be received in any support year by company, project, and/or household may actually defeat the Commission's purpose in establishing the NEBP. By default, the areas to which carriers will deploy broadband service with support from the NEBP are high cost areas and may be sparsely populated. Capping the amount of support that can be provided to a single company, project, and/or household may cause carriers not to file applications for particularly high cost areas, the very areas that are in most need of NEBP support. Alternatively, a cap may cause a carrier not to file an application for a large project that may help deploy broadband service for the first time to a significant number of households and businesses, simply because the cost may exceed a cap established by the Commission. In addition, the NEBP has only been operating for about two years, which CenturyLink believes does not provide the Commission with enough experience to determine what effects caps would have on the NEBP.

The Commission has developed a system for objectively scoring and weighting the applications it receives for NEBP support to ensure that the limited funding available is being used to deploy broadband service to the most number of Nebraskans. CenturyLink recommends the Commission continue to use that system to determine the best use of the NEBP funding and not implement award caps.

Dated October 11, 2013.

Respectfully submitted,

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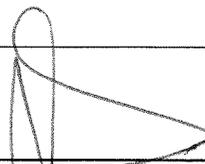
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 11th day of October, 2013, a true and correct copy of the Comments of Qwest Corporation dba CenturyLink QC and United Telephone Company of the West dba CenturyLink were provided to the following interested persons by electronic mail as follows:

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