

**BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION**

In the Matter of the Nebraska Public Service                    ) Application No. C-4543/PI-186  
Commission, on its own motion, to investigate                )  
and explore federally mandated filing of electronic            )  
maps certifying the study area of Incumbent Local            )  
Exchange Carriers in Nebraska.                                    )

**COMMENTS OF  
CITIZENS TELECOMMUNICATIONS COMPANY OF NEBRASKA  
D/B/A FRONTIER COMMUNICATIONS OF NEBRASKA**

On February 20, 2013, the Nebraska Public Service Commission (“Commission”) entered its Progression Order No. 1 (“Progression Order 1”) in this docket. In that Order, the Commission laid out its tentative findings with respect to the Federal Communications Commission (“FCC”) requirements for the submission of certified study area boundary data of Incumbent Local Exchange Carriers (“ILECs”), and invited interested parties to comment on those findings. In response, Citizens Telecommunications Company of Nebraska, Inc. (“Frontier”) files the following Comments.

**Mechanics of verifying and submitting data**

In its Progression Order 1, the Commission noted that, “It is the Commission’s tentative conclusion that the Commission is in the best position to assist Nebraska ILECs with the obligation to file electronic boundary maps with the FCC.”<sup>1</sup> And further, “The Commission tentatively proposes that it manage the creation of electronic boundary maps at the Commission”<sup>2</sup>. Frontier agrees; the Commission is well situated to perform this function.

The Commission lays out four options as to how it could fulfill this managerial role with respect to the various ILECs. Frontier believes any of these four options might be appropriate, given the

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<sup>1</sup> Progression Order 1, page 2.

<sup>2</sup> Progression Order 1, pag 2.

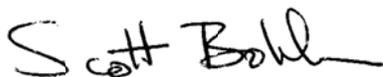
particular circumstance of each ILEC. For its part, Frontier believes that the approach described as Option 1 would be most appropriate for Frontier's situation.

March 15, 2013

Respectfully submitted,

Citizens Telecommunications Company of Nebraska, Inc.  
d/b/a Frontier Communications of Nebraska

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