



BRIAN SANDOVAL
Governor

STATE OF NEVADA
PUBLIC UTILITIES COMMISSION

ALAINA BURTENSHAW
Chairman

REBECCA WAGNER
Commissioner

DAVID NOBLE
Commissioner

CRYSTAL JACKSON
Executive Director

August 31, 2011

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Commissioners:

Re: American Broadband Connectivity Plan ("ABC") and the Rural Rate-of-Return Incumbent Local Exchange Carrier Plan ("RLEC")

On behalf of the Public Utilities Commission of Nevada ("PUCN"), I am submitting the attached comments in the matter of Connect America Fund, WC Docket No. 10-90; A National Broadband Plan for Our Future, GN Docket No. 09-51; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; High-Cost Universal Service Support, WC Docket No. 05-337; Developing an Unified Intercarrier Compensation Regime, CC Docket No. 01-92; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; and Lifeline and Link Up; WC Docket No. 03-109.

Thank you for your consideration.

Sincerely,

Jan J. Cohen
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Public Utilities Commission of Nevada
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JJC/dh
Attachment

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
Establishing Just and Reasonable Rates for Local Exchange Carriers)	WC Docket No. 07-135
)	
High-Cost Universal Service Support)	WC Docket No. 05-337
)	
Developing an Unified Intercarrier Compensation Regime)	CC Docket No. 01-92
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Lifeline and Link Up)	WC Docket No. 03-109

COMMENTS OF THE PUBLIC UTILITIES COMMISSION OF NEVADA

I. INTRODUCTION

The Public Utilities Commission of Nevada has the legislative mandate to regulate public utilities in the State of Nevada to the extent of its jurisdiction, and with regard to telecommunication service, to regulate competitive suppliers in a manner that allows customers to benefit from full competition regarding rates and services; to provide for basic network service to economically disadvantaged persons who are eligible for a reduction in rates for telephone service pursuant to statute, and to maintain the availability of telephone service to rural, insular and high cost areas through the levy and collection of a uniform and equitable assessment from all persons furnishing intrastate telecommunication service or the functional equivalent of such service through any form of telephony technology and payments to telecommunication providers from the fund to maintain the availability of telephone service.

II. DISCUSSION

In response to the Public Notice of Further Inquiry into Certain Issues in the Universal Service-Intercarrier Compensation Transformation Proceeding released August 3, 2011, the Public Utilities Commission of Nevada supports the America's Broadband Connectivity Plan ("ABC Plan")¹ in conjunction with the Rural Rate-of-Return Incumbent Local Exchange Carrier ("RLEC") Plan. To the extent that the ABC Plan and the RLEC Plan are limited to broadband and do not preempt existing Nevada Legislative authority, the plans should be balanced to work together on separate but parallel tracks taking into consideration differences between price cap and rate-of-return companies. Nevada's providers serve the urban populations under price cap and rural populations under rate-of-return regulation.

III. CONCLUSION

The ABC Plan and the RLEC Plan should both be accepted to complement each other as a balanced plan.

Respectfully Submitted,

THE PUBLIC UTILITIES COMMISSION OF NEVADA


ALAINA BURTENSHAW, Chairman


REBECCA D. WAGNER, Commissioner


DAVID NOBLE, Commissioner

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¹ Filed by a group of large and mid-sized incumbent local exchange carriers including AT&T, CenturyLink, FairPoint Communications, Frontier, Verizon and Windstream on July 29, 2011.