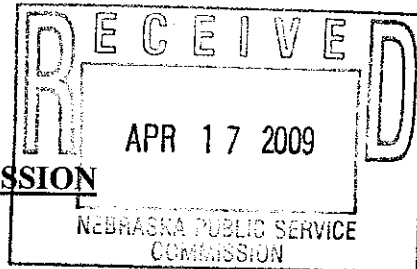


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BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Nebraska Public Service) APPLICATION NO. C-4152
Commission on its own Motion, to adopt a)
relief plan for the 402 area code.)
)
)
)

COMMENTS OF THE NEBRASKA RURAL INDEPENDENT COMPANIES

The Rural Independent Companies (the "Companies")¹ hereby submit the following comments in response to the Order Opening Docket and Setting Workshop (the "Order") entered March 17, 2009, by the Nebraska Public Service Commission (the "Commission") with regard to the adoption of a relief plan for the 402 area code. The Companies appreciate the opportunity to participate in this docket.

In the Order, the Commission requests that interested parties comment on four alternative NPA relief plans proposed in 1999 in Docket C-2057. Three of the four proposals involve geographically splitting the current 402 area code into two area codes whereby one side of the geographic area keeps the existing area code while the other side acquires a new area code. The fourth proposal is an all-services overlay in which the existing area code boundary remains the same and a new second area code is introduced to the same area providing new numbering resources.

The Companies recommend that of the four proposals submitted, the relief plan which is the least disruptive and least costly to consumers should ultimately be chosen by the

¹ The Companies are: Arlington Telephone Company, The Blair Telephone Company, Cambridge Telephone Company, Clarks Telecommunications Co., Consolidated Telco, Inc., Consolidated Telcom, Inc., Consolidated Telephone Company, Curtis Telephone Co., Eastern Nebraska Telephone Company, Great Plains Communications, Inc., Hartington Telecommunications Co., Inc., Hershey Cooperative Telephone Co., K. & M. Telephone Company, Inc., The Nebraska Central Telephone Company, Northeast Nebraska Telephone Company, Rock County Telephone Company, Stanton Telecom Inc., and Three River Telco.

Commission. The Companies believe that requiring 10 digit dialing for calls as a result of an all-services overlay would be much less costly and disruptive than requiring those in the affected area to change existing telephone numbers as a result of splitting the area code.² The Companies believe that the main benefit of an all-services overlay of allowing existing phone numbers to remain unaffected by the new NPA outweighs the inconvenience of 10-digit dialing.

The Companies ask that the Commission be cognizant of translations and routing difficulties that could occur as a result of choosing a specific alternative.³ The Companies anticipate working with the Commission in choosing an alternative which minimizes the occurrences of such difficulties.

The Companies appreciate the opportunity to provide input in selecting an alternative NPA relief plan and look forward to working with the Commission to ensure the transition and ultimate adoption of area code relief is completed in a manner which will be most beneficial to consumers.

Respectfully submitted,

The Rural Independent Companies


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² Area code splits are more costly because of various business and administrative inconveniences to customers due to changes in business stationery, advertising and communicating the number changes to friends and customers. In addition, wireless phones assigned to the effected NPA requires the wireless carrier to reassign the number of every device based in those areas.

³ Area code splits between rate centers where EAS is currently available between the rate center will create translation and routing difficulties.

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of April, 2009, the original of the foregoing Comments was served upon Mike Hybl, Executive Director of the Commission, by hand delivery, and an electronic copy was also provided to the Commission.


Paul M. Schudel