

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Commission, on its) RULE AND REGULATION NO. 172
Own Motion, seeking to amend Title 291,)
Chapter 5, Telecommunications)
Rules and Regulations, to add rules)
regarding customer billing practices.)

PREFILED TESTIMONY OF RURAL INDEPENDENT COMPANIES

This prefiled testimony of Paul M. Schudel is provided pursuant to the Commission's Order dated September 1, 2009:

On behalf of the Rural Independent Companies, who are listed below, this testimony addresses paragraph 002.17C of Appendix A to the Commission's September 1, 2009 Order regarding "Final Bills" and the current provisions of local exchange tariffs of a number of local exchange service providers which require a minimum initial service period with no refund of recurring charges if the subscriber terminates service during such initial service period.

Historically, local exchange carriers generally require, by tariff, that a new customer subscribes for a minimum initial service period. This initial period is generally thirty (30) days. This requirement is fair to all parties and has been in place in many Nebraska local exchange carriers' tariffs for many years.

Section 002.17C would appear to potentially prohibit the practice of requiring a minimum initial service period. The Rural Independent Companies do not believe this consequence was intended by Commission and would request that the Commission modify the proposed regulation to

allow for a minimum initial service period by adding the following language to the end of the current draft of paragraph 002.17C:

“This section shall not apply to a minimum initial service period not to exceed one month.”

Dated: September 12, 2009.

Respectfully submitted,

Rural Independent Companies:

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

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 12, 2009 the foregoing Prefiled Testimony of the Rural Independent Companies on Rule and Regulation No. 172 was hand-delivered to the Nebraska Public Service Commission at 1200 N Street, Suite 300, Lincoln, Nebraska and a copy of the same was emailed to the following:

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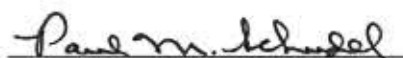
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