

**BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION**

In the Matter of the Commission, on its own	)	
motion, seeking to amend Title 291, Chapter 5,	)	Rule and Regulation No. 177
Telecommunications Rules and Regulations, to	)	
adopt rules regarding filing of agreements	)	Response to
containing terms for provision of regulated	)	September 8, 2010 Order
telecommunication and charges for such	)	Opening Docket and
services contained in a carrier's tariff on file	)	Seeking Comment
with the Commission.	)	

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

On September 8, 2010, the Nebraska Public Service Commission (“Commission”) entered an Order Opening Docket and Seeking Comment (“Order”), inviting interested parties to file comments regarding its proposed rules regarding filing of agreements containing terms for provision of regulated telecommunications services at rates or charges different from the rates and charges for such services contained in a carrier’s tariff.

Citizens Telecommunications Company of Nebraska d/b/a Frontier Communications of Nebraska (“Frontier”) generally supports the rule changes proposed by the Commission. However, Frontier does propose two changes to proposed section 002.21L.

First, contracts may contain confidential information that would have adverse impacts if publicly disseminated. Therefore, Frontier suggests that contracts filed with the Commission pursuant to this rule would be treated as confidential material.

Second, adhering in all cases to the five business day reporting requirement in the rule for filing contracts with the Commission would be administratively difficult, if not impossible. For example, it may be several days after a customer executes a contract before it is physically returned to Frontier’s sales group and, even under the best of conditions, a few more days before it is forwarded to the regulatory group for filing with

the Commission. A twenty-business day window is more reasonable and achievable deadline for filing executed agreements with no negative public interest consequence.

Therefore, Frontier proposes that section 002.21L be reworded as follows:

“A carrier may file a confidential copy of the executed contract containing deviations from its tariff within twenty (20) business days after execution instead of updating or maintaining a contracts with deviation list pursuant to section 002.21K.”

November 1, 2010

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

By:

Scott Bohler

Manager, Government and External Affairs  
Frontier Communications  
2378 Wilshire Boulevard  
Mound, Minnesota 55364  
(952) 491-5534 voice  
(952) 491-5515 fax