

The Omaha Public Power District ("OPPD" or "District") is pleased to provide public comment in the matter of Carrier Current Systems including Broadband over Power Line Systems (ET Docket No. 03-104) pursuant to Notice of Inquiry FCC 03-100.

The Omaha Public Power District is one of the largest publicly owned electric utilities in the United States, serving more than 300,000 customers over 5,000 square miles in 13 southeast Nebraska counties. Generating capability is 2,227,100 kW, and the average residential cost per kWh is 6.80¢ or nearly 20% below the national average. The District was organized as a political subdivision of the State of Nebraska in 1946. Policies and rates are set by an eight-member Board of Directors elected by the people in the areas served.

Public comments offered by the District in support of BPL cover three distinct areas. First, Access Broadband over Power Lines (BPL) would allow OPPD to perform utility related tasks that are a logical extension of business functions for a progressive 21st century electric utility company. Activities such as automated meter reading, distribution system equipment and power quality monitoring would help to improve the efficiency in which utility services are provided to our customer owners. Our customer owners would also benefit as load management, energy management, real-time pricing and outage notification functionality become available. Retail services such as home automation and security monitoring may also be available to BPL customers.

Second, our research indicates that 2% of our urban customers and 69% of our rural customers, representing nearly 44,000 homes, do not have broadband access. Additionally, we estimate that an additional 110,000 homes in our service territory are underserved by BPL provider(s), thus resulting in artificially higher prices and poorer quality service due to the lack of adequate competition. The "digital divide" clearly exists in eastern Nebraska and Broadband over Power Lines allows electric utilities, such as OPPD, to leverage their assets to increase competition in the broadband marketplace. It is reasonable to assume that the offering of retail broadband access by electric utilities will not be wide spread as this is not their core business. However, these assets could be leveraged in a wholesale capacity to retail providers without these firms incurring the exorbitant cost of broadband infrastructure build out, thereby resulting in increased competition.

Lastly, and possibly most importantly, BPL deployment offers public benefit. Distance learning, tele-medicine and other public safety benefits would be available with the deployment of BPL. These public benefits are especially important in areas such as eastern Nebraska with a mostly rural populous.

For the reasons previously stated, the Omaha Public Power District is an avid supporter of the Broadband over Power Line technology and we anxiously await its wide spread commercial availability. Furthermore, we encourage the FCC to view this architecture as the provision of an information service thereby requiring less regulation at the Federal level.

If the District can provide additional information, please contact the following corporate representative. Thank you for the opportunity to offer our perspective on this emerging and beneficial technology.

Respectfully,

/s/  
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