**BEFORE THE**
**FEDERAL COMMUNICATIONS COMMISSION**
**WASHINGTON, D.C. 20554**

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| In the Matter of | § | ET Docket No. 03-104 |
| | § | |
| Carrier Current Systems, including Broadband over Power Line Systems | § | |
| | § | |
| Amendment of Part 15 regarding new requirements and measurement guidelines for Access Broadband over Power Line Systems | § | ET Docket No. 04-37 |

## COMMENTS OF ONCOR ELECTRIC DELIVERY COMPANY

Pursuant to Section 1.415 of the Federal Communications Commission ("FCC") Rules, Oncor Electric Delivery Company ("Oncor") hereby submits its comments in response to the Notice of Proposed Rulemaking in the above-referenced proceeding. Oncor is a regulated electricity transmission and distribution company principally engaged in providing delivery services to retail electric providers that sell power in the north-central, eastern and western parts of Texas. Oncor is a wholly-owned subsidiary of TXU US Holdings Company, which is a wholly-owned subsidiary of TXU Corp.

Oncor believes that broadband over power lines ("BPL") may well present a significant opportunity to broaden public access to broadband services. Moreover, and apart from potential commercial broadband service applications, Oncor believes that considerable, widespread utility industry operational benefits may be available in the longer term, through internal use of BPL technology. Oncor does not believe that those utility industry benefits - as presently envisioned based on the state of BPL development - would justify investment in and deployment of BPL, exclusive of commercial broadband service applications. Such utility benefits would follow only after collateral development by vendors of utility distribution equipment that would be equipped to take advantage of BPL.

The potential interference issues which are the subject of this FCC Notice of Proposed Rulemaking should be addressed by the FCC in a manner that rightfully mitigates interference, but in a manner that is not unnecessarily onerous to the BPL technology and the related market participants and potential future utility applications.

Given the considerable potential of BPL, Oncor hopes that, through this proceeding, the FCC will seek to encourage further deployment and development of this promising technology.

Respectfully submitted,

By: _____

4-30-04
Date