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September 17, 2019

Mary Ridder, Chair
Rural Broadband Task Force
Nebraska Public Service Commission
1200 N Street, #300
Lincoln, NE 68508

VIA EMAIL: ruralbroadband@nebraska.gov

Dear Commissioner Ridder:

Thank you for the opportunity to comment on the draft report.

The Nebraska Municipal Power Pool (“NMPP”) is excited about the Broadband Task Force’s work and its goal to deploy broadband services to Nebraska areas which remain unserved or underserved in the state. We recognize that the challenges are not easy and that the key recommendations and findings are designed to be helpful in encouraging local and regional planning.

Many rural areas in the state have small towns and villages which also have concerns about advancing the deployment of broadband services, possibly through public-private partnerships. These same communities may be currently served by public power districts, cooperatives and/or city-owned systems. The Task Force’s findings surprised municipal and city-owned operators, by leaving them out as important stakeholders who have broadband needs but who currently could be underserved. NMPP’s motto is “working together works.”

Particularly harmful to these stakeholders is the below sentence on Page 3 of the public-private subcommittee report:

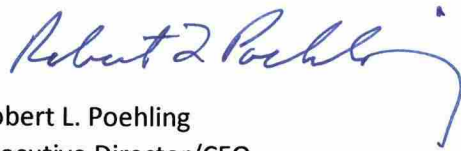
“Municipal provision of broadband does not help rural areas and may hinder rural broadband deployment by eroding telecommunications provider’s business case to provide service to a rural area.”

We request that the Task Force strike that sentence from the final report, as it appears to be an individual’s opinion, not fact-based, as we have found in our other states of Iowa and Colorado. We also request that wherever the report calls out Power Districts and REAs, the Task Force substitute the more generic reference to “public power electric providers.”

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Lastly, NMPP has concerns about several areas of the recommendation which do not address the status quo barriers to public entities leasing dark fiber. Two (2) key recommendations are to (a) retain the existing prohibition on **retail** provision of broadband services by public entities, yet (b) explore ways to make it easier for public entities to lease dark fiber. NMPP would like to remind the Task Force that broadband services may be enhanced by the use of all of the public fiber within the state.

Sincerely,

A handwritten signature in blue ink that reads "Robert L. Poehling". The signature is fluid and cursive, with a long, sweeping tail that extends to the right.

Robert L. Poehling
Executive Director/CEO
Nebraska Municipal Power Pool