

COVINGTON

BEIJING BRUSSELS DUBAI FRANKFURT JOHANNESBURG
LONDON LOS ANGELES NEW YORK SAN FRANCISCO
SEOUL SHANGHAI SILICON VALLEY WASHINGTON

Covington & Burling LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
T +1 202 662 6000

October 4, 2018

Via ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of *Ex Parte* Presentation, WC Docket Nos. 10-90,
14-58, 07-135 and 01-92

Dear Ms. Dortch:

On October 2, 2018, Drew Petersen (Senior Vice President of Corporate Affairs), Ken Paker (Senior Vice President of Information and Network Technologies and Chief Technology Officer), and Robert DeBroux (Director - Federal Affairs and Public Policy), all of TDS Telecommunications LLC (“TDS Telecom”), and the undersigned (counsel to TDS Telecom), participated in meetings with the following persons: (1) Chairman Ajit Pai and his Wireline Advisor, Dr. Jay Schwarz; (2) Commissioner Michael O’Rielly and his legal intern, Kagen Despain; (3) Jamie Susskind, Chief of Staff to Commissioner Brendan Carr; (4) Travis Litman, Chief of Staff and Senior Legal Advisor to Commissioner Jessica Rosenworcel; and (5) Sue McNeil, Alex Minard, Suzanne Yelen, Talmage Cox, Jesse Jachman, and (by phone) Ted Burmeister, all of the Wireline Competition Bureau.

During each meeting, the representatives of TDS Telecom discussed the points raised in the company’s comments of May 28, 2018 in the above-referenced proceedings.¹ In particular, the TDS Telecom representatives discussed the benefits that many rural consumers served by TDS Telecom already are experiencing as a direct result of the Commission’s decisions to commit A-CAM funding. At the same time, the TDS Telecom representatives urged the Commission to raise the cap on eligible locations to the originally-contemplated amount of \$200 per location. In doing so, the Commission will take the next logical—and financially prudent—step towards closing the digital divide. While the total outlay of raising the cap is comparatively modest at approximately \$66 million per year across all A-CAM companies, doing so will guarantee that many more households in rural America receive, for the first time, access to high-quality broadband.

¹ Comments of TDS Telecom, WC Docket Nos. 10-90, 14-58, 07-135 and 01-92 (filed May 28, 2018).

COVINGTON

October 4, 2018

Page 2

The TDS Telecom representatives also expressed the company's support for the compromise set of proposals described in the joint letter filed on October 1, 2018 by the four national associations representing rural telecommunications companies.²

Pursuant to the Commission's rules, a copy of this letter is being filed in the above-referenced dockets. Please contact the undersigned if you have any questions.

Respectfully submitted,

/s/

Matthew S. DelNero
Counsel for TDS Telecom

cc: Meeting participants

² Letter from Genevieve Morelli (ITTA), Jonathan Spalter (USTelecom-The Broadband Association), Shirley Bloomfield (NTCA-The Rural Broadband Association), and Kelly Worthington (WTA-Advocates for Rural Broadband), WC Docket Nos. 10-90, 14-58, 07-135 and 01-92 (filed Oct. 1, 2018).