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Via ECFS

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

Re: Notice *Ex Parte* Presentation, WC Docket Nos. 10-90

Dear Ms. Dortch:

On July 30, 2019, the undersigned, counsel to TDS Telecommunications LLC (“TDS Telecom”); Carol E. Matthey of Matthey Consulting LLC; and Robert DeBroux, Director - Federal Affairs and Public Policy of TDS Telecom, held *ex parte* meetings in the above-captioned proceeding with the following persons: (1) Preston Wise, Special Counsel to Chairman Ajit Pai; and (2) Alex Minard, Gilbert Smith, Talmage Cox, and Nissa Laughner of the Wireline Competition Bureau.

During the meetings, the TDS Telecom representatives expressed views consistent with the comments of TDS Telecom, filed on July 19, 2019, in response to the Bureau’s Public Notice of June 5, 2019.¹ That Public Notice sought comment on location adjustment procedures under the Alternative Connect America Model (“A-CAM”) program, in cases in which the number of actual locations is found to be less than the number of locations predicted to be available to serve by the A-CAM model.

In particular, the TDS Telecom representatives urged that (1) A-CAM funding should not be reduced on a *pro rata* basis where the number of actual locations is less than predicted locations, given that the cost of serving an area does not meaningfully decrease when there are

¹ See [Comments of TDS Telecommunications LLC](#), WC Docket No. 10-90 (filed July 19, 2019); *Wireline Competition Bureau Issues Corrected Alternative Connect America Model II offers to 37 Companies, Extends the Election Deadline, and Seeks Comment on Location Adjustment Procedures*, WC Docket No. 10-90, [Public Notice](#), DA 19-504 (WCB June 5, 2019).

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fewer actual locations than anticipated; (2) further analysis is necessary to decide upon the appropriate remedy in the event of location shortfalls; and that, in any event, (3) it would be premature for the Commission to adjudicate location shortfalls years in advance of the end of the support term for A-CAM recipients. Requiring A-CAM companies to undertake the process to adjust their A-CAM deployment obligations now would be especially inappropriate given the anticipated improvements in coming years to broadband mapping and data collection, which likely will yield a better data set on what locations actually are available to serve.

The TDS Telecom representatives concluded by emphasizing TDS Telecom's willingness to work collaboratively with the Commission and other stakeholders to develop appropriate mechanisms around location shortfalls.

Please contact the undersigned with any questions about this submission.

Sincerely,



Matthew S. DelNero
Counsel to TDS Telecom