



August 22, 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 No. 17-108

Dear Ms. Dortch:

I write to encourage the Commission to continue to promulgate policies and regulations that support the ability of service providers such as TDS Telecommunications Inc. ("TDS Telecom") to deploy and expand the reach of their broadband networks both within and outside the markets in which they currently offer such service.

Over the years, the Commission has adopted a framework that levels the playing field for regulating broadband services, fostering an environment conducive to capital investment for all players. This trend, which includes the Commission's recent application of "light touch" regulation to the open internet, has contributed to a stable regulatory environment that facilitates business planning. At the same time, the Commission has expanded and funded targeted programs such as the ACAM high cost fund that have enabled service providers to deploy broadband networks beyond what a more typical business case ordinarily might allow, enabling service providers to deploy their resources in a way that helps close the Digital Divide.

This careful balance between thoughtful and even-handed regulation, on the one hand, and targeted funding and support, on the other hand, has in many cases resulted in the meaningful investment and deployment of broadband infrastructure, including in regions that in the past lacked such connectivity or did not have enough of it. Indeed, in some cases it has enabled service providers to redirect existing capital to broadband deployment projects that otherwise would have not been possible.

When it comes to broadband investment and deployment, the Commission's approach has enabled TDS Telecom to devote an unprecedented level of capital spending for fiber in markets in which TDS Telecom currently has a presence, as well as in markets in which the company currently does not have a presence but sees an opportunity to improve the broadband experience currently being delivered by other service providers. For instance:

- TDS Telecom is directing \$40 million to deploy broadband infrastructure to new, out-of-territory markets, bringing 1 Gigabit services to underserved communities that today have available to them only slow DSL from the incumbent wireline provider and usually no more than 100 Mbps service from the cable company, which for all practical matters is the only

real broadband choice for customers in these markets. TDS Telecom's entry level speeds in these markets, which are not eligible for high cost funding, will at the outset surpass the fastest speeds currently available to consumers, starting at 300 Mbps with additional speed offerings to 600 Mbps and 1 Gbps. Residential and business customers in communities as small as 5,000 households and as large as 25,000 households in these markets will, in addition to a rich broadband experience, also be able to enjoy sophisticated IPTV services and digital voice from TDS Telecom as part of an elegant, value-priced bundle. This investment is consistent with similar investments TDS Telecom made or is making in other markets.¹

- TDS Telecom will direct upwards of \$20 million to existing TDS Telecom markets that are not ACAM eligible, fortifying them with a "fiber deeper" strategy that will enable customers in these markets to receive many of the same state-of-the-art services described above.²

These developments have not gone unnoticed. Last month, *Telecompetitor* observed that "TDS is quite busy with fiber upgrades in its home state of Wisconsin," citing the company's multiple fiber overbuild strategies designed "to opportunistically expand its broadband reach in several markets across the country."³ *Fierce Telecom*, for its part, reported earlier this year that TDS Telecom had "earmark[ed] \$60 million to fund . . . new fiber expansions inside and outside its wireline footprint throughout 2018."⁴

TDS Telecom believes that the Commission's broadband policies have contributed significantly to creating an environment that has made these investments possible, and the company believes that if the Commission continues to strike the right balance between regulatory reform and strategic, targeted support and investment, broadband connectivity in the United States can proliferate even further.

TDS Telecom appreciates the opportunity to share its experiences with the Commission and urges the Commission to continue to develop policies and approaches that best support broadband investment.

Respectfully submitted,



¹ See, e.g., "TDS Gets Aggressive: Plans to Overbuild Charter and Frontier with Fiber Broadband," *Telecompetitor*, April 27, 2018, available at <https://www.telecompetitor.com/tds-gets-aggressive-plans-to-overbuild-charter-frontier-with-fiber-broadband/> (describing plans to overbuild Oregon and McFarland, Wisconsin, markets); "TDS Gigabit Launched in Former Municipal Broadband Market," *Telecompetitor*, September 27, 2017, available at <https://www.telecompetitor.com/tds-gigabit-launched-in-former-municipal-broadband-market/> (describing plans to deploy gigabit broadband service in Prairie, Wisconsin, market).

² "TDS Telecom to Spend \$60M to Expand Existing, Out-of-Territory Fiber Builds," *Fierce Telecom*, February 26, 2018, available at <https://www.fiercetelecom.com/telecom/tds-to-spend-60m-to-expand-existing-out-territory-fiber-builds> (describing company's use of ACAM funds bring more fiber into rural part of its service territory)

³ "TDS Announces Another Fiber Overbuild Market," *Telecompetitor*, July 10, 2018, available at <https://www.telecompetitor.com/tds-announces-another-fiber-overbuild-market/> (describing plans to deploy fiber-to-the-home in Windsor, Wisconsin, market).

⁴ See *infra*, note 2.