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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, 14-58, 07-135, and
CC Docket No. 01-92

Dear Ms. Dortch:

Counsel to TDS Telecommunications LLC (“TDS Telecom”) files this notice of *ex parte* presentations supporting the request of ITTA for a modest clarification to the draft Report and Order in the above-captioned proceedings.¹ Under the requested clarification, the adopted version of the Report and Order would state that existing “glide path” A-CAM companies will be offered a revised offer of support with increased deployment obligations and a term of support through 2028.

Specifically, on December 5, 2018, Robert DeBroux, Director - Federal Affairs and Public Policy of TDS Telecom, left a voicemail supporting the proposed clarification for Preston Wise, Special Counsel to Chairman Pai; Arielle Roth, Wireline Legal Advisor to Commissioner O’Rielly; Travis Litman, Chief of Staff and Senior Legal Advisor to Commissioner Rosenworcel; and Alexander Minard, Deputy Division Chief of the Telecommunications Access Policy Division in the Wireline Competition Bureau. On the same day, Mr. DeBroux spoke about the same subject by telephone with Jamie Susskind, Chief of Staff to Commissioner Carr.

In these presentations, Mr. DeBroux expressed TDS Telecom’s support for the clarification proposed by ITTA in its *ex parte* letter of November 30, 2018.² As ITTA explained in that letter, the Commission can further increase access to 25/3 Mbps service by clarifying in

¹ *Connect America Fund et al.*, Report and Order, Further Notice of Proposed Rulemaking, and Order on Reconsideration, FCC-CIRC1812-02 (Public Draft Nov. 21, 2018).

² See Letter from Michael J. Jacobs, ITTA to Marlene H. Dortch, FCC, WC Docket Nos. 10-90, 14-58, 07-135, and CC Docket 01-92 (filed Nov. 30, 2018).

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the Report and Order that existing A-CAM “glide path” carriers will be offered a revised offer of support with increased deployment obligations and thus can become “Revised A-CAM I” carriers. Any existing glide path carrier that accepts the revised offer of support would commit to deliver 25/3 Mbps service to a higher percentage of eligible locations in exchange for a revised term of support that would expire at the end of 2028, rather than 2026. In contrast, excluding glide path carriers from a revised offer of support would mean that fewer customers in these territories would receive 25/3 Mbps service as compared to customers in Revised A-CAM I carriers’ territories.

Mr. DeBroux further agreed with ITTA that the Commission would promote a uniform approach to model-based companies by allowing glide path carriers that accepted the original offer of support to accept a revised offer extending their term to 2028. In fact, TDS Telecom owns and operates A-CAM companies in 25 states, five of which contain glide path companies. It would serve both the Commission’s and the public’s interest in expanded 25/3 Mbps service to allow the companies in these five states (and other glide path companies) the same opportunity as other A-CAM companies to commit to expanded 25/3 Mbps service with an additional two years of support.

Please contact the undersigned with any questions about this submission.

Sincerely,

/s/ Matthew S. DelNero

Matthew S. DelNero
Counsel to TDS Telecom