

COVINGTON

BEIJING BRUSSELS LONDON NEW YORK
SAN DIEGO 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

July 10, 2015

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. 10-90

Dear Ms. Dortch:

On Wednesday, July 8, 2015, Bob DeBroux, Director - Federal Affairs & Public Policy of TDS Telecommunications Corp. (“TDS Telecom”), spoke by telephone with Carol Matthey, Deputy Chief of the Commission’s Wireline Competition Bureau, regarding the process and timetable for effectuating Universal Service Fund reform by the end of the calendar year. In particular, Mr. DeBroux discussed the allocation of the reserve dollars in the Connect America Fund (“CAF”) among companies opting in to model-based support, and how a statewide election of CAF support for companies with multiple study areas would work. With regard to the former, Mr. DeBroux noted the complexity involved in deciding how to allocate the limited resources available for model-based support if there is more demand for such support than reserves would cover, including the balance between funding companies with various levels of existing buildout and achieving the Commission’s goal of “biggest bang for the buck.” In the course of the call, Mr. DeBroux also discussed recent submissions made in the docket by the Independent Telephone & Telecommunications Alliance regarding how essential it is to make sure that buildout obligations be tailored to the amount of support distributed.

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

Respectfully submitted,

/s/

Yaron Dori
Counsel for TDS Telecom

cc: Carol Matthey