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October 29, 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 Tuesday, October 27, 2015, Bob DeBroux, Director - Federal Affairs & Public Policy of TDS Telecommunications Corp. (“TDS Telecom”), spoke with Matt DelNero, Chief of the Commission’s Wireline Competition Bureau, regarding the Commission’s plans to reform federal universal service funding for Rate of Return carriers.

In the course of the discussion, Mr. DeBroux conveyed the importance of reform to TDS Telecom, and the role reform will play in the company’s ability to continue to deploy broadband in its service region. In doing so, Mr. DeBroux urged the Commission to consider the real world implications of the paths it is considering for reform, whether under the bifurcated plan or the model plan. In the case of the bifurcated plan, Mr. DeBroux noted that the critical issues for the Commission’s consideration should include the operation of the benchmark and the transition from today’s rules to the new rules that will determine how new investment will be supported by the program. In the case of the model plan, Mr. DeBroux noted that the Commission’s examination of the plan’s feasibility should include whether fund recipients indeed will be able to meet their obligations, and the ability for multi-study area companies to utilize this form of regulation. In both cases, Mr. DeBroux stressed the need to consider both the unintended consequences of taking a particular path and the importance of striking a balance that ensures that the Commission maximizes the total number of broadband connections that will be generated by both high and low cost companies based on available funding.

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: Matt DelNero