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October 26, 2006

**VIA ECFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 06-74**

Dear Ms: Dortch:

On October 25, 2006, Peter Healy, Regulatory and Legal Counsel, and Steve Pitterle, Manager - External Relations, TDS Metrocom, LLC, and the undersigned met via teleconference with (1) Scott Bergmann and Chris Reichman, Office of Commissioner Jonathan S. Adelstein; and (2) Scott Deutchman, Office of Commissioner Michael J. Copps. At the meetings, we presented the views summarized below.

We emphasized that TDS Metrocom, LLC fully supports the proposed conditions on any approval of the AT&T/BellSouth merger submitted by COMPTEL. We additionally emphasized that any conditions imposed on the merger should apply across the AT&T and BellSouth region and should have at least a seven year duration. We reiterated our strong support for the proposed cap on UNE prices as strengthened by the COMPTEL proposal.

TDS strongly supports a requirement that the merged company offer DSL capable loops at a significant discount insofar as it will offer DSL at a retail price of \$10 per month. This price is below the price for DSL capable UNE loops in every market in which TDS Metrocom, LLC operates. Therefore, while TDS Metrocom, LLC supports the proposal to offer consumers a discount on broadband service, the AT&T proposal of a \$10 price without a companion wholesale discount for CLECs would be anticompetitive. The AT&T proposal would also ultimately harm consumers by potentially thwarting competitive broadband entry throughout the AT&T and BellSouth regions.

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TDS Metrocom, LLC, a member of the Telephone and Data Systems (TDS) family of companies, is a facilities-based competitive local exchange carrier that provides local, long-distance, and high-speed Internet services to residential and business customers in communities throughout Wisconsin, Illinois, Michigan, Minnesota and North Dakota. TDS Metrocom, LLC serves approximately 400,000 access lines.

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Sincerely,

/s/

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