Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554

In the Matter of	)	
High-Cost Universal Service Support	)	WC Docket No. 05-337
	)	
Federal-State Joint Board on	)	CC Docket No. 96-45
Universal Service	)	

COMMENTS OF TDS TELECOMMUNICATIONS CORPORATION

Mace J. Rosenstein
Lee J. Tiedrich
Sumit R. Shah*

COVINGTON & BURLING LLP
1201 Pennsylvania Avenue, N.W.
Washington, DC 20004-2401
(202) 662-6000

Counsel to TDS Telecommunications Corporation

April 17, 2008

* *Admitted to the California Bar. Not yet admitted to the bar of the District of Columbia. Supervised by principals of the firm pending admission.*

SUMMARY

TDS supports many of the broad policy recommendations contained in the Federal-State Joint Board's Recommended Decision ("Recommended Decision"). As the Joint Board recognizes, the time has come to stop attempting to adapt universal service programs designed for one purpose in order to serve another. The Commission must review the existing universal service programs and the incentives they create, and must make the changes necessary to align universal service incentives with their underlying policy goals, such as fostering the deployment of mobility and broadband in unserved and underserved areas. Although the Recommended Decision does not furnish every detail, and does not necessarily head in the right direction where it does furnish detail, it represents a bold step in laying out a new direction for universal service. Importantly, the Recommended Decision initiates a comprehensive discussion on the reforms that need to take place to align universal service funding with the overarching goals that have been articulated by policymakers at the highest levels.

TDS generally supports the Joint Board's recommendation to adopt a three-program approach to distributing universal service funds, providing separate support for broadband, mobility, and providers of last resort ("POLRs"), using mechanisms that are calibrated to further the goals of universal service in each context. Such an approach will help assure that support is properly targeted to accomplish specific universal service goals for broadband and mobility, while safeguarding existing mechanisms that have proven to be highly effective in promoting universal service for POLRs.

Although TDS supports the broad conclusions outlined in the Recommended Decision and many of the steps taken to implement those conclusions, TDS nevertheless believes that certain of the Joint Board's proposals are misguided and threaten to do great harm. For instance,

TDS urges the Commission not to create a permanent cap on the Universal Service Fund (the "Fund"). The precise amount of universal service funding should depend not on artificial limitations such as previous funding levels, but on the amounts that correspond to the Commission's and other policymakers' goals for universal service, and on the time-frame for achieving those goals.

TDS also continues to urge great caution with respect to the use of reverse auctions. Reverse auctions remain untested. TDS believes that, absent a better understanding of the legal and policy issues raised by reverse auctions, as well as the mechanics of their implementation, reverse auctions should not be implemented in the sensitive context of universal service. The use of reverse auctions to distribute universal service support to POLRs, for example, could have devastating consequences for subscribers of rural carriers, including the compromise or interruption of existing service in high-cost areas, stranded investment, and lower overall investment in infrastructure. Unfortunately, rather than answer any of the concerns raised in previous reverse auction discussions, the NPRM raises new ones: the use of a reserve price in particular does not seem feasible under the Commission's goals and proposed framework.

Finally, while TDS applauds the Commission's willingness to address multiple aspects of universal service at once, TDS urges the Commission to round out its comprehensive reform by moving to expand the base of Fund contributors and resolving outstanding intercarrier compensation issues that are inextricably intertwined with universal service goals. Although important in their own right, the Commission's proposals will fall short of rehabilitating universal service and achieving its goals absent these important additional steps.

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On January 29, 2007, the Commission released a consolidated set of notices inviting comment on multiple aspects of universal service reform.[1] TDS Telecommunications Corporation ("TDS")[2] is a long-standing participant in the discussion regarding universal service and previously has advocated that reform to universal service must be comprehensive in nature, taking into account broad policy goals, rather than a piecemeal treatment of multiple discrete but interrelated issues.[3] TDS welcomes this opportunity to assist the Commission as it engages in a

[1] *See High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Notice of Proposed Rulemaking, FCC 08-4 (Jan. 29, 2008); *High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Notice of Proposed Rulemaking, FCC 08-5 (Jan. 29, 2008); *High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Notice of Proposed Rulemaking, FCC 08-22 (Jan. 29, 2008). The Commission has extended the comment and reply comment deadlines for this proceeding from April 3, 2008, to April 17, 2008, and from May 5, 2008, to May 19, 2008, respectively. *High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Order, DA 08-674, at ¶¶ 2–3 (Mar. 24, 2008).

[2] TDS is the parent company of 113 incumbent local exchange carrier subsidiaries serving more than 700,000 local access lines in small and rural communities throughout the United States.

[3] *See, e.g., Federal-State Joint Board on Universal Service; Cingular Wireless, LLC Petition for Designation as Eligible Telecommunications Carrier in the State of Georgia*, Comments of TDS Telecommunications Corp., CC Docket No. 96-45, at 10 (filed Feb. 20, 2007) ("[T]he Commission hinders its important work to reform universal service by forcing itself and interested parties to split their attention between two proceedings, and by analyzing the policy repercussion of reform in piecemeal.").

comprehensive review of the universal service system.

I. TDS SUPPORTS A THREE PROGRAM APPROACH WITHIN A SINGLE UNIVERSAL SERVICE FUND.

TDS supports the November 20, 2007, recommendation of the Federal-State Joint Board on Universal Service proposing a single Universal Service Fund with one broad collection mechanism and three different programs – broadband, mobility, and POLR – each with its own systems of accountability, suitable to its individual goals. By broadening support but targeting funding, a three program fund would help satisfy the statutory requirement that universal service be "sufficient," "predictable" and "specific,"[4] and would clarify and help realize the goals of universal service. However, TDS strongly opposes a permanent overall cap on the Fund because it would be entirely at odds with the goals of universal service. Instead of imposing such a cap on the eve of comprehensive reform, the Commission should embrace the Joint Board's vision of universal service and put its time and energy into focusing on the details of a funding mechanism that will achieve it.

A. TDS Supports Creation Of A Separate Broadband Program.

Rural carriers have a proven track record of increasing broadband availability and penetration into rural and other high-cost areas.[5] The Commission should recognize the role broadband plays in rural areas and the increasing demand for broadband service, and make support for this advanced service explicit. This will help provide the proper incentives for further broadband deployment in rural areas that are lagging behind. TDS accordingly supports the inclusion of broadband Internet as a supported service and the establishment of a broadband

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[4] 47 U.S.C. § 254(b)(5).

[5] *See Universal Service Monitoring Report*, CC Docket No. 98-202, CC Docket No. 96-45, at 3-1 – 3-306 (2004).

program within the Universal Service Fund separate and apart from POLR support.

TDS views the primary purpose of a broadband program as supporting construction of new facilities and infrastructure in rural areas with little or no high-speed Internet service today. The broadband program also would serve the secondary purposes of (i) enhancing broadband networks in areas with substandard service and (ii) providing operating subsidies to broadband Internet providers where continued operation and maintenance of facilities is not otherwise economic, even following an initial build-out supported by universal service funding.[6] Absent these secondary purposes, any broadband gains likely would be short-lived.

Finally, broadband should be defined at an adequate and evolving speed. In statements accompanying the Commission's notices of proposed rulemaking and the Joint Board's recommended decision, individual Commissioners noted the importance of high-speed Internet access to American global innovation.[7] In recognition of the importance of competitive broadband speeds, the Commission should adopt an evolving broadband standard that not only keeps rural areas competitive with urban centers, but also keeps America competitive with the rest of the world.

B. TDS Supports Creation Of A Separate Mobility Program.

TDS recognizes the value to society of ubiquitous mobility. Despite the questions raised by the current CETC mechanisms as to whether they create the proper incentives for investment, and the absence of accountability discussed below, the rise of wireless telephony has benefited

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[6] *High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, Recommended Decision, 22 FCC Rcd. 20477, 20481 (2007).

[7] *See High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, WC Docket 05-337, CC Docket No. 96-45, Statement of Commissioner Michael J. Copps; Statement of Commissioner Jonathan S. Adelstein (released Jan. 29, 2008).

consumers – especially those consumers in low cost and urban areas – who today have more communication options than in decades past. Wireless mobile technology also has public safety potential that has yet to be fully tapped, especially in sparsely populated areas where construction of a cell tower may not be economically justified absent universal service support. TDS accordingly supports the establishment of a mobility program within the Universal Service Fund that is aimed at supporting wireless infrastructure in unserved and underserved areas.[8]

As with broadband, the mobility program should provide operating subsidies to wireless providers to maintain and operate their networks and to ensure an ongoing business case for providing and expanding service in unserved or underserved areas. At the same time, the mobility program should recognize its unique goals and calibrate universal service support accordingly in order to provide the proper incentives for infrastructure deployment.

C. The Commission Should Preserve Existing POLR Support As A Separate Program.

The current mechanisms of ILEC support – with their historic success in bringing basic and advanced services to rural and other high-cost areas – should continue as a separate POLR program within the Fund. ILECs, and in particular rural ILECs, have a proven track record of furthering the goals of universal service without applying undue pressure on the Fund. Funding of POLR service accordingly should remain largely as it is today.[9] The Commission should keep its focus on the components of the universal service system that are actually broken.

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[8] *See High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, Recommended Decision, 22 FCC Rcd. 20477, 20482 (2007).

[9] As discussed below, ILECs still fall short of their true potential to increase broadband penetration due to unnecessary and artificial limits to the High Cost Loop Fund.

II. TDS SUPPORTS THE JOINT BOARD'S CONCLUSION THAT ALL UNIVERSAL SERVICE SUPPORT MUST PROVIDE INCENTIVES AND HAVE APPROPRIATE SAFEGUARDS THAT CLEARLY PROMOTE THE GOALS OF UNIVERSAL SERVICE.

The fundamental goal of universal service is to ensure that all consumers, including those in high-cost areas, have access to evolving and advanced telecommunications services at reasonable and comparable rates.[10] To help achieve this goal, universal service funding mechanisms need to provide incentives for ETCs to expand and maintain telecommunications infrastructure in unserved and underserved areas. The universal funding mechanisms for rural ILECs, such as TDS, continue to succeed in advancing this goal.[11] For instance, in areas served by TDS, advanced telecommunications services currently are available to over 86 percent of households. Moreover, the structure of the current universal service funding system for rural ILECs provides incentives to continually increase this level of availability. As the Joint Board has recognized, overall support to ILECs remains relatively level and yet penetration of advanced services such as broadband increases each year.[12] Although this POLR model of correlating universal service support directly to costs already incurred may not be appropriate for the broadband or mobility programs proposed by the Joint Board, it provides the proper incentive for carriers operating under Rate of Return regulation.

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[10] 47 U.S.C. § 254(b)(3).

[11] *See Universal Service Monitoring Report*, CC Docket No. 98-202, CC Docket No. 96-45, at 3-1 – 3-306 (2004) (presenting statistics on high-cost support).

[12] *High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, Recommended Decision, 22 FCC Rcd. 20477, 20487 (2007) ("Support to most if not all RLECs has been flat or has even declined since 2003. Under existing support mechanisms, RLECs have done a commendable job of providing voice and broadband services to their subscribers."). The funding mechanisms under which rural carriers operate provide investment incentives, such that RLECs continue to develop infrastructure over which advanced services can be deployed. Of course, were existing caps to be lifted, deployment would increase with respect to both speed and coverage.

In contrast to the ILEC model, the current system for distributing universal service funding to CETCs does not necessarily bear a concrete "relationship to the amount of money . . . competitive ETCs have invested in rural and other high-cost areas"[13] because funding is typically provided in advance of costs actually being incurred. While applying an identical or similar cost based POLR model to the broadband or mobility programs proposed by the Joint Board may help align incentives, these carriers are not operating under Rate of Return regulation. The Commission thus should exercise caution before creating an incentive that would require the replication of a Rate of Return costing scheme for broadband or mobility in order to be successful.

There is some evidence that, in lieu of Rate of Return style regulation, some states have implemented investment accountability safeguards that have been successful at requiring appropriate accounting for the universal service funding received by CETCs. For example, the Maine Public Utilities Commission requires that all CETC universal service support be used to build out rural systems, and it monitors compliance with its requirements through its ETC designation/certification process.[14] Such an approach provides both desirable incentives for the

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[13] *High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Notice of Proposed Rulemaking, FCC 08-4, at ¶ 5.

[14] *See High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Comments of the Maine Public Utilities Commission, at 5 (filed June 6, 2007). Maine requires that ETC designation petitions contain, among other things: (1) a statement that the telecommunications provider will offer the services supported by high cost support through the area for which it seeks designation; (2) a substantive plan of the investments to be made with initial federal support during the first five years in which support is received and a substantive description of how those expenditures will benefit customers; and (3) in the case of wireless telecommunications providers, service area maps showing existing and planned locations of cell sites and indicating the signal strength of such cell sites. 65-407-26 Me. Code R. § 3 (2008). The Maine PUC also requires that CETCs that receive federal high cost universal service support certify and report annually on, among other things: (1) the investments made and expenses paid with high-cost support; (2) any failures to provide

efficient use of universal service funds and repercussions if those funds are not properly utilized.[15]

Accordingly, it may be necessary to incorporate additional incentives into the current system of CETC universal service support in order to align funding with the goals of universal service. Of the states that designate CETCs, not all require a real, enforceable and sufficient showing that universal service funding will be or has been used to install or improve networks in unserved or underserved areas. Moreover, some states have been unable or unwilling to follow up with designated CETCs to ensure that distributed support has furthered universal service goals.[16] This is not meant to imply that CETCs are undeserving of, or categorically misuse, the funding they receive. No doubt many CETCs have used universal service support to build out their networks. It is only to suggest the obvious: that universal service support for CETCs should provide incentives that further the goals that underlie that support, in conjunction with appropriate safeguards.[17]

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services in the CETCs' designated service areas; (3) the planned investment and expenses related to Maine that CETCs expect to use as the basis to request high-cost support; (4) updated five-year plans; and (5) for wireless CETCs, updated service maps. *Id.* § 6.

[15] The Commission should, perhaps, consider taking such an approach at the federal level.

[16] In a petition dated June 4, 2007, TDS has shown that one CETC did not live up to the promises it made to secure designation in the state of Virginia, despite receiving millions in universal service support. *See Federal-State Joint Board on Universal Service; Petition for Revocation of Sprint/Nextel's Designation as an Eligible Telecommunications Carrier in the State of Virginia*, Rural ILECs Petition for Revocation of Sprint/Nextel's ETC Designation in Virginia or, Alternatively, Motion to Show Cause, CC Docket No. 96-45 (filed June 4, 2007) (pointing out that the CETC's build-out has been largely confined to its existing coverage areas and to interstate highways, and that several rural study areas remain excluded altogether from the CETC's coverage areas nearly four years after it first sought ETC designation).

[17] In general, for universal service to be effective, it must provide both a carrot and a stick – it should provide incentives to deploy the funding appropriately, and accountability to make sure that those incentives have had the proper effect.

The Recommended Decision of the Joint Board expressly recommends adding "mobility" to the definition of supported services.[18] The Recommended Decision also articulates clear goals for wireless providers that receive universal service funding. As discussed in the previous section, TDS believes that the right solution is a separate mobility program within the Fund designed with the realities of wireless carriers' respective networks in mind. TDS urges the Commission to follow the Joint Board's Recommended Decision and work toward the Joint Board's clear vision of ubiquitous mobility (and broadband) and ongoing support for POLRs.

III. THE COMMISSION SHOULD NOT SUBJECT THE FUND TO A PERMANENT CAP, OR CAP THE INDIVIDUAL ELEMENTS OF THE ILEC HIGH COST FUND.

TDS believes strongly that a permanent overall cap on the Fund is not warranted and actually would contravene the goals of universal service. Artificially capping the Fund is generally inconsistent with the goals of universal service and the Congressional mandate that universal service remain "sufficient."[19] And an artificial cap likely would cause an immediate reduction in infrastructure build-out.

The overall size of the universal service fund should depend instead on the reasonable estimations of what it will cost to effectuate the stated goals of Congress and other policymakers to whom these goals have been entrusted for implementation – for instance, ubiquitous broadband penetration – and the Commission's preferred time-frame for accomplishing those goals. The more ambitious the Commission's goals and timing, the less feasible a cap at existing

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[18] *High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, Recommended Decision, 22 FCC Rcd. 20477, 20478 (2007) ("The Joint Board now recommends that the nation's communications goals include achieving universal availability of mobility services.").

[19] 47 U.S.C. § 254(b)(5) ("There should be specific, predictable and *sufficient* Federal and State mechanisms to preserve and advance universal service.") (emphasis added).

funding levels becomes. Instituting a permanent, all-carrier cap will artificially limit the options available to the Commission, Congress, and other policymakers at a critical juncture for advanced telecommunications.

TDS also strongly opposes capping the individual elements of the ILEC high cost fund, as contemplated by the Joint Board.[20] Capping these elements is completely unnecessary: this particular part of the Fund is simply not growing to any meaningful extent and, consequently, does not threaten the sustainability of the Fund. Meanwhile, the Commission should recognize that capping any individual component of legacy funding (e.g., interstate common line support) has ramifications for the incentives of carrier investment throughout the network, is in conflict with the Commission's rate of return regime, and would require additional rule changes not contemplated in the record to be effectuated in this proceeding.

IV. THE COMMISSION SHOULD EXERCISE GREAT CAUTION IN CONSIDERING THE USE OF REVERSE AUCTIONS.

In a series of previous filings, TDS and others have described the challenges presented by reverse auctions.[21] Before conducting reverse auctions, the Commission would need conclusive answers to many questions, including whether auctions can provide "predictable" and "sufficient" support,[22] and what to do if a winning bidder fails to meet its carrier performance and service requirements.

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[20] *See High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Recommended Decision, 22 FCC Rcd. 20477, 20485 (2007) (recommending that, during the transition period, each of the five major current support mechanisms be separately capped at 2007 levels).

[21] *See, e.g.*, *Federal-State Joint Board Public Notice on the Merits of Using Auctions to Determine High-Cost Support*, Comments of TDS Telecommunications Corp., WC Docket No. 05-337; CC Docket No. 96-45 (filed Oct. 10, 2006).

[22] *Id.* at 9–10; 47 U.S.C. § 254.

Underscoring the complexity of reverse auctions in this context, the Commission's notice has introduced potential new questions while leaving the previously identified questions unresolved. TDS is particularly concerned with the Commission's proposed use of a reserve price,[23] which does not seem feasible or consistent with the Commission's universal service goals and proposed framework. For example, if the reserve price were set too low, it is not at all clear how the Commission would avoid the result of having certain otherwise Fund-eligible regions not receive support – and hence service – at all.

Meanwhile, the stakes of getting reverse auctions wrong are very high. In the context of POLRs, for instance, the risks include the possibility that service will be compromised or interrupted. Reverse auctions should not be used for POLRs for this reason alone, especially in the absence of any evidence that reverse auctions are needed for POLRs; ILEC support has remained steady, with verifiable advancement over many years of the goals of universal service. Unless the Commission addresses the many concerns raised in the record about reverse auctions, it should hesitate to use reverse auctions as a tool to distribute universal service funding to any program participant.

V. USF REFORM SHOULD INCLUDE REFORM OF CONTRIBUTION AND INTERCARRIER COMPENSATION.

As stated above, TDS welcomes several of the Joint Board's recommendations and applauds the Commission's willingness to address universal service in a comprehensive manner. Reforming the mechanism that delivers support to CETCs to be in line with the proper incentives and creating three separate programs will do much to stabilize the Fund, restore accountability,

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[23] *See High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Notice of Proposed Rulemaking, FCC 08-22, at ¶ 36 (Jan. 29, 2008).

and direct universal service toward its proper goals.

Any permanent universal service "fix," however, necessarily involves at least two additional reforms. First, the Commission should broaden the universal service contribution base to encompass all of its beneficiaries.[24] An increasing range and volume of broadband connections and IP-enabled services have heavily taxed carrier high cost networks in recent years. In order to sustain the Fund and continue to make gains in broadband speed and penetration, all broadband network participants should support universal service. Modifying the Fund contribution methodology by spreading contributions across all broadband beneficiaries will help ensure adequate support in the face of a more ambitious broadband agenda.[25]

Second, and more important, intercarrier compensation revenues must be standardized and steadied, so they can continue to serve as a reliable source of revenue to provide incentives for broadband investment. ILECs traditionally have relied on intercarrier access revenue in addition to universal service support to build a business case for providing advanced services in high-cost areas. Changes in the telephony marketplace, however – characterized today by convergence, new technologies, and new bundled service options – continue to erode access charges as a revenue stream. Thus, for instance, increased use of voice-over-IP technology, which travels over ILEC networks, has translated into a decline in access revenue. Moreover,

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[24] *See Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Comments of TDS Telecommunications Corp. on Proposals to Modify Rules Relating to High-Cost Universal Service Support, at 14–15 (filed Sep. 30, 2005) ("[T]he Commission should modify the USF contribution methodology to ensure that all consumers who benefit from and take advantage of a ubiquitous and reliable national telecommunications infrastructure contribute to the provision and maintenance of that network in high-cost areas.").

[25] TDS has argued that the Commission move from an interstate revenue base to a numbers and/or connections base. Letter from Gerard J. Waldron, Counsel to TDS Telcommunications Corp., to Marlene Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45, at 1–2 (filed June 29, 2007).

the proliferation of broadband Internet has meant that less telecommunications calls are being placed, period – consumers are opting to book tickets or buy flowers online, rather than place a telephone call to a customer service representative.

The result of this phenomenon is that ILECs have been placed in an untenable position. As ILECs build out their broadband networks, services increasingly migrate from the traditional switched services to broadband, and the access charges ILECs collect inevitably decline. If declining access revenue cannot be stabilized, ILECs will lose an important set of incentives to invest in infrastructure, and broadband built-out and sustainability will be compromised. Compounding the problem is the issue of phantom traffic – that a significant and quantifiable percentage of ILEC traffic cannot be traced back to the originating carrier and consequently travels over the ILEC networks without being subject to access fees. As more customers increasingly utilize wireless and VoIP services, the percentage of phantom traffic likely will increase, which in turn will result in further declines in access revenues.

The Commission has an open docket – CC Docket No. 01-92 – on intercarrier compensation; coalitions of carriers have developed and advanced comprehensive proposals for reform.[26] Given intercarrier compensation's interrelation with, and importance to, universal service, the Commission should revisit intercarrier compensation as part of its current universal service reform efforts. Even if the Commission is unwilling to adopt a comprehensive new intercarrier compensation system, it should, at a minimum, take steps to address the issues of

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[26] *See Developing a Unified Intercarrier Compensation Regime*, Order, 21 FCC Rcd. 14626, 14626 (2006) (plan by National Association of Regulatory Utility Commissioners called the "Missoula Plan").

phantom traffic[27] and stem the erosion of access revenue. For instance, the Commission could equalize rates between state and interstate access, moving the lost revenue streams into a sustainable fund.

CONCLUSION

TDS appreciates the opportunity to participate in the Commission's comprehensive and timely efforts to reform the universal service system. By establishing separate broadband, mobility and POLR programs within the Fund that are tailored to promote the goals of universal service, expanding the contribution mechanism, and reforming intercarrier compensation, the Commission can stabilize the Fund while supporting ambitious new efforts to expand and improve services to rural and other high-cost areas. The Commission should not "fix" what is not broken, however – legacy support for POLRs has proven effective at advancing the goals of universal service without straining the Fund. The Commission should not change the way POLRs are supported, especially through the use of reverse auctions. Moreover, the Commission should set universal service funding levels on the basis of its ultimate goals and not establish an artificial overall cap to the Fund. TDS expects that the Commission will act quickly and judiciously in this proceeding, and TDS looks forward to a healthier universal service

[27] *See* Letter from The Supporters of the Missoula Plan to Marlene Dortch, Secretary, Federal Communications Commission, CC Docket No. 01-92 (filed Nov. 6, 2006) (the Comprehensive Solution for Phantom Traffic, which contains an industry proposal for a uniform process for the creation and exchange of call detail records, attached)

system, which in turn will further the goal of making mobility and broadband services available to all United States consumers.

Respectfully submitted,

TDS TELECOMMUNICATIONS CORPORATION

By: ______________________
Mace J. Rosenstein
Lee J. Tiedrich
Sumit R. Shah*

COVINGTON & BURLING LLP
1201 Pennsylvania Avenue NW
Washington, DC 20004-2401
(202) 662-6000

Its Attorneys

April 17, 2008

* *Admitted to the California Bar. Not yet admitted to the bar of the District of Columbia. Supervised by principals of the firm pending admission.*