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February 28, 2011

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: In the Matter of Connect America Fund *et al.*
WC Docket Nos. 10-90, 07-135, 05-337, 03-109; CC Docket Nos.
01-92, 96-45; GN Docket No. 09-51

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. §1.1206, this letter provides notice that on Friday, February 25, 2011, Robert DeBroux, Director of Public Policy and Federal Regulatory Affairs, TDS Telecommunications Corporation ("TDS Telecom"), spoke by telephone with Sharon Gillett, Chief, Wireline Competition Bureau, and Patrick Halley, Policy Advisor in the Bureau. The purpose of the meeting was to follow up on certain matters discussed in an earlier *ex parte* telephone conversation between the parties on February 18, 2011, concerning the *Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking* (rel. Feb. 9, 2011) issued in the above-captioned proceedings.¹

During the telephone conversation on February 25th, Mr. DeBroux explained the importance of ensuring that any changes in current recovery mechanisms do not preclude or limit recovery of investments made to serve high-cost areas under the rules in effect at the time of such investment. Mr. DeBroux also discussed the tension in the relationship between the concepts of disaggregation and carrier of last resort ("COLR") in high-cost areas. He also noted the need for any incentive-based regulatory framework to include an option for rate-of-return carriers.

¹ See Letter of Yaron Dori and Matthew S. DelNero, Covington & Burling LLP, Counsel to TDS Telecom, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; CC Docket Nos. 01-92, 96-45; GN Docket No. 09-51, filed Feb. 22, 2011.

If you have any questions, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew S. DelNero". The signature is fluid and cursive, with a long horizontal stroke at the end.

Yaron Dori

Matthew S. DelNero

Counsel to TDS Telecom

cc: Sharon Gillett
Patrick Halley