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September 21, 2011

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554

Re: ***Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92; *High Cost Universal Service Support*, WC Docket No. 05-337; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135; *Connect America Fund*, WC Docket No. 10-90; *A National Broadband Plan for Our Future*, GN Docket No. 09-51**

Notice of Ex Parte Communication

Dear Ms. Dortch:

On September 19, 2011, Sara Cole, Manager, Federal Affairs of TDS Metrocom, LLC ("TDS Metrocom"), along with the undersigned met with Albert Lewis, Marcus Maher and Travis Littman of Wireline Competition Bureau's Pricing Policy Division.

The participants discussed the specific information TDS Metrocom provided in its September 6, 2011 Reply Comments to demonstrate the disproportionate impact of the ABC Plan's terminating access rate transition on competitive local exchange carriers ("CLECs") such as TDS Metrocom. As Mr. Pitterle's Declaration shows, the ABC Plan glide path would cause TDS Metrocom to lose a significantly higher percentage of terminating intrastate access revenue (63% on average across the four states where TDS Metrocom operates) as compared to the percentage reduction expected for price cap LECs against whom TDS Metrocom competes (17% on average) in the first two steps of the Plan. CLECs like TDS Metrocom that serve primarily business customers under long-term contracts averaging 60 months lack flexibility to incorporate such a steep, short-term revenue reduction in their business plan. Moreover, TDS Metrocom is unlikely to experience access expense savings because the price cap LECs in three states where TDS Metrocom operates have intrastate access rates that equal interstate rates or differ by less than one percent.

TDS Metrocom emphasized that two of the states in its operating territory have adopted a "type of carrier" distinction when setting transition periods, requiring large

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incumbents to reduce rates on a shorter timeframe than competitors.[1] TDS Metrocom supports the Competitive Amendment's straight-line, eight-year transition plan for CLECs as consistent with these state transitions and a better means to achieve the Commission's goals of avoiding disruptive change and providing a measured transition that gives CLECs time to adjust their business plans.

Sincerely yours,

/s/ *electronically signed*

Tamar E. Finn

cc (by e-mail):

Albert Lewis
Marcus Maher
Travis Litman

[1] See TDS Metrocom Sept. 6 Reply Comments, at 8-9.