

# COVINGTON & BURLING LLP

1201 PENNSYLVANIA AVENUE NW  
WASHINGTON, DC 20004-2401  
TEL 202.662.6000  
FAX 202.662.6291  
WWW.COV.COM

BEIJING  
BRUSSELS  
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NEW YORK  
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WASHINGTON

August 3, 2012

## Via ECFS

Ms. 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; GN  
Docket No. 09-51, WC Docket No. 07-135; WC Docket No. 05-  
337; CC Docket No. 01-92; CC Docket No. 96-45; WC Docket  
No. 03-109; WT Docket No. 10-208

Dear Ms. Dortch:

On Wednesday, August 1, 2012, the undersigned, together with Robert Debroux, Director - Federal Affairs & Public Policy, and Tim Ulrich, Manager - Regulatory Affairs, of TDS Telecommunications Corp., met with the following members of the Wireline Competition Bureau staff: Dan Ball, Randy Clarke, Greg Haledjian, John Hunter, Rhonda Lien, and Merry Wulff. The purpose of the meeting was to discuss the Commission's rules for calculating the 2011 base revenue period for rate-of-return carriers pursuant to section 51.917(c)(ii) of the Commission's rules, and, more specifically, the limitations that the limited waiver process set forth in footnote 1745 of the *USF / ICC Transformation Order* places when an owing carrier has sought bankruptcy protection. We discussed the nature and purpose of footnote 1745 and ways in which its objective can be met without impeding the ability of carriers to recover the funds needed to best pursue the Commission's policy objective of widespread and ubiquitous broadband build out.

Pursuant to the Commission's rules, I am filing a copy of this letter in the above-referenced dockets. Please contact me if you have any questions.

Respectfully submitted,

/s/

Yaron Dori

cc: Dan Ball (via e-mail)

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Randy Clarke (via e-mail)  
Greg Haledjian (via e-mail)  
John Hunter (via e-mail)  
Rhonda Lien (via e-mail)  
Merry Wulff (via e-mail)