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January 10, 2014

*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

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Dear Ms. Dortch:

On January 8, 2014, Robert J. DeBroux, Director of Public Policy & Federal Regulatory Affairs for TDS Telecom, met with Nicholas Degani, Wireline Legal Advisor to Commissioner Ajit Pai, regarding several matters in the above-captioned dockets. First, the participants discussed the status of TDS Telecom's pending waiver petition regarding the ability of TDS Telecom to include amounts owed to it by Halo Wireless, Inc., in TDS Telecom's eligible recovery baseline.<sup>1</sup> TDS Telecom conveyed its understanding that its waiver petition would be considered by the full Commission and reiterated the importance to TDS Telecom of the Commission acting expeditiously. Second, the participants discussed alternatives to the use of quantile regression analysis ("QRA") as a basis for caps on universal service support, in light of Chairman Wheeler's recent public announcement that the Commission will abandon the flawed QRA approach. Finally, the participants discussed issues relating to the Wireline Competition Bureau's Public Notice seeking comment on steps the Commission can take to facilitate the ability of rural carriers to participate in the Connect America Phase II program, including through voluntary conversion to price-cap status.<sup>2</sup> Mr. DeBroux emphasized the importance of providing interested rural carriers with a feasible, attractive pathway out of rate-of-return regulation.

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<sup>1</sup> TDS Telecommunications Corp., Petition for Limited Waiver of 47 C.F.R. § 51.917(c), filed August 10, 2012.

<sup>2</sup> *Wireline Competition Bureau Seeks Comment on Options to Promote Rural Broadband in Rate-of-Return Areas*, WC Docket No. 10-90, Public Notice, 28 FCC Rcd 7201 (WCB 2013).

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Pursuant to the Commission's rules, TDS Telecom is filing a copy of this letter in the above-referenced dockets. Please address any questions concerning this submission to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Yaron Dori', written in a cursive style.

Yaron Dori  
*Counsel to TDS Telecom*

cc: Nicholas Degani