



525 Junction Rd
Madison, WI 53717
www.tdstelecom.com

VIA ECFS

March 4, 2014

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Connect America Fund*, WC Docket No. 10-90
Expression of Interest – Rural Experiments

Dear Ms. Dortch:

On behalf of its affiliate TDS Baja Broadband LLC¹ ("TDS Baja Broadband"), TDS Telecommunications Corp. ("TDS Telecom"), is filing this non-binding expression of interest for the receipt of funding to undertake an experiment in a rural area that lacks high-speed broadband service.² At a very high level, the attached proposal is for deploying and upgrading an IP-based network of a non-incumbent provider in a rural area where high-speed broadband is lacking.

If this proposal is ultimately funded, it will provide the FCC with valuable information regarding technology transitions in areas served by incumbent carriers. It will also provide the FCC with valuable experience in assessing the process for which a non-incumbent carrier would need to undertake to obtain certification as an Eligible Telecommunications Carrier (ETC) and its ability to meet all of the associated regulatory obligations.

Please feel free to contact Timothy Ulrich at 608-664-4114 if you have any questions or need any more information.

Sincerely,

A handwritten signature in black ink, appearing to read "D Wittwer", is written over a horizontal line.

David A. Wittwer
TDS Telecommunications Corp.
President and CEO

Attachment (1)

¹ On August 1, 2013, TDS[®] acquired the assets of Baja Broadband, LLC. This TDS subsidiary is now known as TDS Baja Broadband, LLC. The National Broadband Map refers to TDS Baja Broadband as Baja Broadband Holding Company, LLC. Through joint ownership, Baja Broadband is affiliated with TDS Telecom.

² See *Connect America Fund*, WC Docket No. 10-90, FCC 14-5, at paras. 86-136 (rel. January 31, 2014)

Attachment

Expression of Interest to Conduct a Rural Experiment TDS Baja Broadband LLC

Submitting Entity

TDS Baja Broadband LLC (TDS Baja Broadband): TDS Baja Broadband, headquartered in Alamogordo, New Mexico, employs 275 people and passes more than 210,000 homes. TDS Baja Broadband is a full service telecommunications company offering residential and commercial video, high-speed Internet, phone and data services in communities throughout Arizona, Colorado, New Mexico, Nevada, Texas and Utah. TDS Baja Broadband has upgraded its plant to 750/860 MHz and DOCSIS 3.0 in 96% of its network.

TDS Telecommunications Corp. (TDS Telecom), headquartered in Madison, Wis., operates TDS Baja Broadband. TDS Baja Broadband is operated by TDS Telecom's senior management team and is backed by TDS Telecom's managerial, technical, and financial strength. TDS Telecom has a long history of building and maintaining robust voice, data and IP-based networks in over one-hundred rural ILEC, high-cost areas.

Proposed Experiment Service Area

As the video franchised provider in several New Mexico markets, TDS Baja Broadband is already providing a cable IP-based network in New Mexico that serves customers at speeds greater than 3Mbps downstream and 768 kbps upstream except for the rural areas of Carrizozo, NM. The proposed experiment would upgrade the Carrizozo network to provide 576 addresses in the rural areas of Carrizozo, NM that are located in the eligible census tract 35027960200 where broadband service is designated as unserved.¹

Broadband Technologies to be Deployed

The experiment would be designed to upgrade (DOCSIS 3.0) the existing Carrizozo cable IP-based network to offer high-speed broadband service to these unserved customers. Specifically, preliminary engineering designs entail deploying Fiber-to-the-Home (FTTH) utilizing RF-Over-Glass (RFOG) technology, which will offer IP-based voice, television and broadband services to its Carrizozo customers at speeds up to 100 Mbps downstream and 10 Mbps upstream.

Contemplated Service Offerings

Over this cable IP-based network, Carrizozo customers would be offered voice, television and broadband services at prices similar to what TDS Baja Broadband offers for such services in the more densely-populated portions of its franchised cable service territory. TDS Baja Broadband intends to offer its Carrizozo customers broadband at various speed tiers ranging up to 100 Mbps.

Funding Needed to Conduct Experiment

The total capital budget for building the proposed project is estimated to be \$1.5M, which would be for a one-time funding request. The construction of the network can begin immediately and be completed within two years.

¹ On February 6, 2014, the FCC's Wireline Competition Bureau issued a Public Notice linking to a list of eligible census tracts in price cap areas that are "potentially suitable for such experiments" with associated potential support amounts.