

April 24, 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

Dear Ms. Dortch:

On April 22, 2014, I spoke by telephone with Greg Haledjian of the Pricing Policy Division of the Wireline Competition Bureau in connection with the Petition for Limited Waiver of 47 C.F.R. § 51.917(c) filed by TDS Telecommunications Corp. (“TDS Telecom”) in the above-referenced proceedings.<sup>1</sup>

During the conversation, I confirmed that although TDS Telecom provides telecommunications service in 28 states, it billed Halo Wireless Inc. (“Halo”) for access charges in a total of 13 states during Fiscal Year 2011: Alabama, Arkansas, Florida, Georgia, Indiana, Kentucky, Michigan, Mississippi, North Carolina, Oklahoma, South Carolina, Tennessee and Wisconsin. I also confirmed my understanding that Halo operated in a total of 21 states before filing for bankruptcy protection. Those 21 states consisted of the 13 in which TDS Telecom billed Halo for access charges in Fiscal Year 2011, as well as California, Illinois, Kansas, Louisiana, Missouri, Nevada, Ohio and Texas. Lastly, I confirmed my understanding that to the extent any settlements were reached between Halo and other carriers in Halo’s bankruptcy proceeding, they pertained to pre- and post-petition payments made by Halo to certain third parties, not to intercarrier compensation owed by Halo to these carriers.

Lastly, Mr. Haledjian asked whether there had been any further activity in the state proceedings identified by TDS Telecom in its ex parte of December 20, 2012, in the above-referenced proceedings. To TDS Telecom’s knowledge, the only development not reflected in

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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.

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that ex parte was the issuance on January 7, 2013, of an order by the Kentucky Public Service Commission finding, among other things, that Halo breached its interconnection agreement with AT&T and that Halo was liable for the payment of access charges.<sup>2</sup>

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: Greg Haledjian (via e-mail)

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<sup>2</sup> See *BellSouth Telecommunications, LLC, d/b/a AT&T Kentucky v. Halo Wireless, Inc.*, Case No. 2011-00283, Order (Jan. 7, 2013), available at [http://psc.ky.gov/order\\_vault/Orders\\_2013/201100283\\_01072013.pdf](http://psc.ky.gov/order_vault/Orders_2013/201100283_01072013.pdf).