FCC's National Broadband Plan

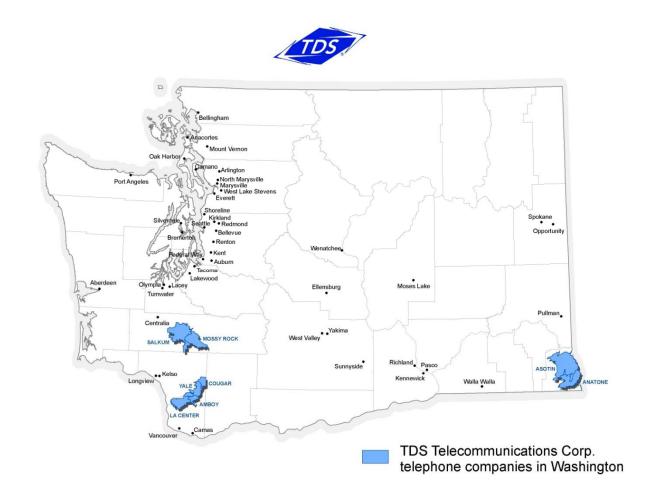
What is the role of the States?
Will the plan provide incentives to invest in a broadband capable network?

Bob DeBroux

Director - Federal Affairs and Public Policy

TDS Telecom

TDS Washington Operations



TDS Washington Operations

- Asotin Telephone Company
- Lewis RiverTelephone Company
- McDaniel Telephone Company

- 96% broadband availability
- 11,000 access lines
- 767 square miles
- 14 lines per sq. mi.

• Closing the broadband availability gap requires financial support from federal, state and local governments (138)

• Closing the broadband availability gap and connecting the nation will require a substantial commitment by states and the federal government alike. This commitment should must include initial support to cover the capital costs of building new networks in areas that are unserved today, as well as ongoing support for the operation of newly built networks in areas where revenues will be insufficient to cover ongoing costs. (139)

• Reform requires federal and state coordination. The FCC should seek input from state commissions on how to harmonize federal and state efforts to promote broadband availability. (143)

• In targeting funding to the areas where there is no private sector business case to offer broadband service, the FCC should consider the role of state high-cost funds in supporting universal service and other Tribal, state, regional and local initiatives to support broadband. A number of states have established state-level programs through their respective public utility commissions to subsidize broadband connections, while other states have implemented other forms of grants and loans to support broadband investment. (145)

7

Exhibit 8-F:

Roadmap for USF/ICC Reform

Roadmap for USF/ICF Reform

| | Stage One (2010-2011) | Stage Two (2012-2016) | Stage Three (2017-2020) |
|---------------------------|---|-------------------------------|--|
| Universal service | Create Connect America Fund and Mobility Fund Adopt rules to eliminate Interstate Access Support and re-target funding levels to broadband Adopt rules to move rate- of-return carriers to incentive regulation Begin implementation of Sprint/Verizon Wireless merger commitments to reduce their competitive ETC funding to zero Adopt rules to phase out other competitive ETC support to zero over five yea | | Eliminate legacy High-Cost programs |
| Intercarrier compensation | Adopt framework for long-term intercarrier compensation reform, while implementing interim measures to curb arbitrage | Begin reductions in ICC rates | Phase out per-minute rates |

May 6, 2010 Washington 8

Proposed 2010 Key Broadband Action Agenda Items*

| | Q2 2010 (CY) | | Q3 2010 (CY) | | Q4 2010 (CY) | | | |
|---|---|---------------------------------|--|--------------------------------------|---|--|------------------------------------|--|
| Promote World- Leading Mobile Broadband Infrastructure and Innovation | Mobile Roaming Order and FNPRM (WTB) | | AWS Bands Analysis (WTB, OET) | | | AWS Potential Order (WTB, OET) | | |
| | D Block Order/NPRM (WTB, PSHSB) [Also in Public Safety] | | | | Secondary Markets Internal Review (WTB) | | | |
| | Launch Strategic Spectrum Plan and Triennial Assessment | | Spectrum Sharing/Wireless Backhaul NPRM/NOI (WTB, OET) | | | Spectrum Dashboard 2.0 (WTB, OET, PSHSB, MB, IB) | | |
| | (WTB, OET, OSP) | | Oppor. Use of Spectrum NPRM (OET, WTB, IB, MB, PSHSB) | | Recommendation re: Contiguous Unlicensed Spectrum | | | |
| | 2.3 GHz WCS/SDARS Order (OET, WTB, IB) | | TV White Spaces Opinion & Order (OET, MB, WTB) | | | Proceeding (OET, WTB) | | |
| | | | MSS NPRM (OET, IB, WTB) | | | Experimental Licensing NPRM (OET) | | |
| | | | Broadcast TV Spectrum Innovation NPRM (OET, MB, WTB) | | | | | |
| Accelerate Universal Broadband Access and Adoption | USF Reform NPRM and NOI (WCB, WTB) | | Mobility Fund | | NPRM (WTB, WCB) | | | |
| | Lifeline/Low-Income Joint Board Referral | Order (WCB, WTB) | Hearing Aid Compat. Second Rep OET, CGB) | ort & C | Order/FNPRM (WTB, | Spectrum on Tribal Lands NPI | RM (WTB, CGB) | |
| | E-Rate FY2011 NPRM (WCB) | | OE1, OOD) | П | E-Rate FY2 | (2011 Order (WCB) | | |
| | USF Merger Commitments Order (WCB, WTB) | | Rural Health Care Reform NPRM (WCB) | | USF Transformation NPRM (WCB, WTB) | | | |
| | Lifeline Pilot Roundtable (WCB, WTB) | | Lifeline Flexibility NPRM (WCB, V | Lifeline Flexibility NPRM (WCB, WTB) | | Intercarrier Compensation NPRM (WCB, WTB) | | |
| | FCC/FDA Workshop and PN on Converged Devices (OET) | | Establish Accessibility and Innovation Forum (CGB, WCB, WTB) | | rum (CGB, WCB, WTB) | USF Contributions NPRM (WCB, WTB) | | |
| | Launch FCC Office of Native American Affairs (CGB) | | Real-Time Text NOI (CGB, WCB, WTB, OET) | | Real-Time Text NPRM (CGB, WCB, WTB, OET) | | | |
| | FCC-Native Nations Broadband Task Force (CGB) | | The time teacher (God) (Tob, Trib, G21) | | Internet Video and Device Accessibility NOI (CGB, WCB, WTB, MB) | | | |
| F4 | Mahila Window Connection Depot (MTD, OCD) | | | | - / | | | |
| Foster Competition | Mobile Wireless Competition Report (WTB, OSP) | | Interconnection Clarification Order (WCB) | | Small Business Broadband & Wholesale Comp. NOI (WCB) | | | |
| and Maximize | Pole Attachments Order and FNPRM (WCB) Small Business Broadband & Wholesale Comp. PN (WCB) | | Rights-of-Way Task Force (CGB, WCB) | | Sinaii business broadband & wholesale Comp. NOT (WCB) | | | |
| Consumer | | , | shop (WCB, WTB, OSP) Special Access NI | | PRM (WCB, WTB, OSP) | | | |
| Benefits Across the Broadband Ecosystem | CableCARD NPRM (MB, OET) | | | | | | | |
| | Smart Video Devices NOI (MB, OET) | art Video Devices NOI (MB, OET) | | | | | Smart Video Devices NPRM (MB, OET) | |
| | Launch Tech. Adv. Grp. on Speed & Perf. (CGB, OET, WCB) | | Transparency & Disclosure | | | NPRM (CGB, WCB, WTB, OET) | | |
| | Launch Speed and Performance Measurement Program | | | | | Broadband Data NPRM (WCB, WTB, OSP) | | |
| Advance Robust and Secure Public Safety Communi- cations Networks | (CGB, WTB, WCB, OET) | Public Safety Reaming | & Priority Access NPRM (WTB, | 1 | | | | |
| | | | PSHSB) | J | | NG 911 NOI (PSHSB, OET, W | CB, WTB) | |
| | D Block Order/NPRM (V | | WTB, PSHSB) [Also in Mobile] | | Back-Up Power NOI (PSHSB, OET, WTB) | | | |
| | 700 MHz Waiver Petit | | tions (PSHSB, WTB, OET) | | Serv. Outage & Homeland Security NPRM (PSHSB, OET, | | | |
| | ERIC Public Safety Interoperability Order | (PSHSB) | 700 MHz Public Safety Order/FNP | RM (PS | SHSB, WTB, OET) | WCB, WTB, IB) | | |
| | Cybersecurity Certification NOI (PSHSB, WTB, OET, WCB) | | Location Accuracy FNPRM (PSHSB, OET, WTB) | | | | | |
| | Survivability NOI (PSHSB, OET, WTB, WCB) | | | | | | | |
| | Serv. Outage & Homeland Security Workshop (PSHSB, OET, WCB, WTB, IB) | | | | | | | |
| | Tele communications C | Competition E | Office of Media Engineering and Fechnology (OET) (MB) | Go | onsumer & overnmental Affairs ureau (CGB) | Public Safety & Homeland Security Bureau (PSHSB) | | |

^{*} This document reflects only proposed FCC actions, not those of other government agencies, and is not exhaustive of all 2010 FCC actions. The location and timing of actions in this document represents a series of targets that may be adjusted to respond to changing conditions as appropriate; liems that span quarterters are expected to occur late in the earlier quarter. Ones not include initiatives discussed in Agenda from Q1 2010 and earlier (E-rate Community Use Order, Rural Health Care Pilot Program Extension Order, Spectrum Dashboard Beta, and Tower Sting Declaratory Allring).

Questions – Stage 1

- What are the impacts of eliminating IAS and freezing ICLS on a per line bases?
- What is the impact of moving Rate of Return Carriers to incentive regulation?
- What is the impact of the long term intercarrier compensation reform framework?
- What are the interim measures to curb arbitrage, and what are their impacts?

Questions – Stage 2

- How does the transition to the CAF work?
 - How are legacy funds transitioned into broadband funds?
 - What is the impact of choosing between a fixed and a mobile provider of broadband in high cost areas?
 - How is the funding determined where there is no "bidding?"
- How will lost revenues from access rate reductions be dealt with, if at all?
 - SLCs? Local rate increases? Not at all?

Questions – Stage 3

- How does the CAF work?
 - Does it provide adequate incentive for deployment of broadband networks?
 - Is "reasonable comparability" attained and maintained?
- Does the plan have the potential to produce "unfunded mandates"
 - Will there be areas where no one can afford to serve?