

**Before The
Federal Communications Commission
Washington, DC 20556**

In the Matter of)
)
TDS Broadband LLC) **File No. ITC-214** _____
)
Application pursuant to Section 214 of)
The Communications Act of 1934)
as amended to provide global)
resale services)

Application

TDS Broadband LLC ("TDS Broadband"), a Delaware limited liability company, pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S. C. §214 (1982), and Section 63.18 of the FCC's Rules, 47 C.F.R. §63.18, hereby applies for global international resale authority between the United States and international points ("the Application"). By granting the Application, the FCC will serve the public interest, convenience and necessity by promoting competition in the international services market. Competition will also benefit U.S. consumers by increasing service options and lowering prices.

Background

TDS Broadband is a wholly owned subsidiary of Telephone and Data Systems, Inc. ("TDS"), a Delaware corporation. TDS Broadband, in turn, owns 100 percent of TDS Baja Broadband LLC ("TDS Baja Broadband").

TDS Baja Broadband is a cable television company headquartered in Madison, Wisconsin. It provides video, high speed broadband and voice services to residential and commercial customers in Colorado, New Mexico, Texas, Utah, Arizona and Nevada. TDS Baja

Broadband holds domestic 214 authority from the FCC to provide the telecommunications component of these services.¹

TDS is a diversified telecommunications service company. It provides wireless operations through its 84 percent owned subsidiary United States Cellular Corporation ("U.S. Cellular") and wireline operations through its wholly-owned subsidiary TDS Telecommunications Corporation ("TDS Telecom"). U.S. Cellular presently serves approximately 5 million customers and TDS Telecom provides approximately 1 million customer connections. Neither TDS Telecom nor U.S. Cellular currently provides service in any of TDS Baja Broadband's franchise areas.

TDS Broadband plans to provide international services on a resale basis through the switching facilities of either TDS Metrocom, Inc. ("TDS Metrocom") or TDS Long Distance Corporation ("TDS Long Distance"), which both hold international 214 authority (ITC-214-19980210-00094; ITC-214-20090106-00010). Both TDS Metrocom and TDS Long Distance are wholly owned subsidiaries of TDS Telecom and thus are also indirect subsidiaries of TDS. However, TDS Broadband is not owned by either TDS Metrocom or TDS Long Distance. Since one subsidiary cannot utilize the international 214 authority of another commonly owned subsidiary unless one is the parent of the other,² TDS Broadband hereby seeks its own international 214 authority.

Information Required By Section 63.18 of the Rules.

- (a) TDS Broadband LLC
525 Junction Road
Madison, WI 53717

¹ On May 11, 2013, the Wireline Competition Bureau granted a "domestic 214" application to transfer the assets of Baja Broadband, LLC to TDS Baja Broadband. See, Public Notice, "Notice of Domestic Section 214 Authorization Granted," WC Docket No. 13-89, DA 13-1041, released May 13, 2013. That transfer was consummated on August 1, 2013.

² See Report and Order, 22 FCC Rcd 11398, 11408, ¶¶ 28-32, (2007).

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- (b) TDS Broadband is a Delaware limited liability company.
- (c) TDS Telecom
525 Junction Road
Madison, WI 53717
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With a copy to:

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- (d) TDS Broadband holds no other 214 authority. TDS Baja Broadband holds domestic 214 authority. See Footnote 1, supra. It provides video, high speed broadband, and voice service to its residential and commercial customers via interconnected Voice Over Internet Protocol (VOIP) facilities.
- (e)(2)(i) TDS Broadband requests global resale Section 214 Authority pursuant to the terms and conditions of Section 63.18(e)(2) of the FCC's Rules, 47 C.F.R. §63.18(a)(2)
- (e)(2)(ii) None.
- (e)(2)(iii) TDS Broadband will comply with the terms and conditions contained in Sections 63.21 and 63.23 of the FCC's Rules.
- (e)(3) Not applicable.
- (f) Not applicable
- (g) Not applicable
- (h) As previously noted, TDS Broadband is a wholly owned subsidiary of TDS.

TDS is controlled by a Voting Trust whose trustees are LeRoy T. Carlson, Jr., Walter C.D. Carlson, Prudence E. Carlson, and Dr. Letitia G.C. Carlson. They are brothers and sisters and U.S. citizens. The address of the trust is TDS's business address: 30 North LaSalle Street, Chicago, IL 60602.

LeRoy T. Carlson, Jr. is the President of TDS and Walter C. D. Carlson is its non-executive Chairman.

The Voting Trust controls 53.8% of the voting power of TDS's total shares that vote in matters other than the election of directors and 94.8% of the Series A Common Shares which elect eight of TDS's 12 directors. Further information regarding TDS can be found in its Form 602, "FCC Ownership Disclosure Information for the Wireless Telecommunications Services" on file with the Commission.

No other entity holds an aggregate 10 percent or greater equity or voting interest in TDS.

TDS has no interlocking directorates with foreign carriers.

- (i) TDS Broadband is not affiliated with any foreign carriers.
- (j) Not applicable.
- (k) Not applicable.
- (l) Not applicable.
- (m) Not applicable.
- (n) TDS Broadband hereby certifies that it has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses market power on the foreign end of the route and will not enter into such agreements in the future.
- (o) TDS Broadband hereby certifies that it is not subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §854(a).
- (p) TDS Broadband requests, streamlined processing for the Application pursuant to Section 63.12 of the Commission's Rules. TDS Baja Broadband certifies that:
 - 1. It is not affiliated with any foreign carrier in a destination market;
 - 2. It has no affiliation with a dominant U.S. carrier whose international switched or private line services TDS Broadband seeks authority to resell either directly or indirectly through the resale of another carrier's services.

Conclusion

For the foregoing reasons, TDS Broadband respectfully requests that the Commission grant the authority requested in the Application.

Respectfully submitted,

TDS Broadband LLC

By: _____/s/_____

Name: David A. Wittwer

Title: President

Date: August 22, 2013