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Of Counsel
Michael B. Bressman

Harlan Dodson Jr.
(1916-1986)

July 20, 2018

Via Hand Delivery

Chairman, Tennessee Public Utility Commission
c/o Sharla Dillon, Dockets and Records Manager
502 Deaderick Street, 4th Floor
Nashville, Tennessee 37243

Re: Application of Google Fiber Tennessee, LLC for a State-issued Certificate of Franchise Authority, Docket No. 14-00145

Dear Chairman Morrison:

Enclosed please find an original and five copies of Google Fiber Tennessee, LLC's Request for Extension of Time to Meet Deployment Requirements ("Request") and an original and five copies of the Affidavit of Jill Szuchmacher in Support of Google Fiber Tennessee, LLC's Request ("Affidavit"). Please file the original and four copies of the Request and the Affidavit in the above-referenced docket, and please date-stamp and return the fifth copy of each with the courier. Copies of these documents were filed electronically in the docket office on July 20, 2018.

If you have any questions concerning this filing or matter, please do not hesitate to contact me at (615) 254-2291 or by email at mbressman@dodsonparker.com. Thank you for your assistance with this matter.

Sincerely,

Michael B. Bressman

Enclosures

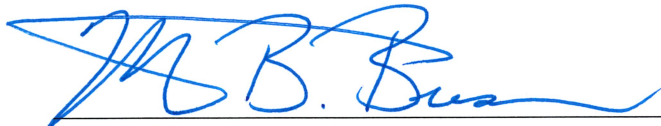
**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE**

IN RE:)
)
APPLICATION OF GOOGLE FIBER)
TENNESSEE, LLC FOR A STATE-ISSUED) **Docket No. 14-00145**
CERTIFICATE OF FRANCHISE AUTHORITY)

REQUEST FOR EXTENSION OF TIME TO MEET DEPLOYMENT REQUIREMENTS

Pursuant to Tenn. Code Ann. § 7-59-311(e), Google Fiber Tennessee, LLC (“Google Fiber”) requests a twenty-four (24) month extension to meet the requirements of Tenn. Code Ann. § 7-59-311(b). Google Fiber has made substantial and continuous effort to meet the requirements of § 7-59-311(b); however, it will not meet these requirements by the deadline contained in that subsection. In support of its request, Google Fiber submits the Affidavit of Jill Szuchmacher, Manager of Google Fiber and Director of Network Deployment and Operations of Google Fiber Inc.

Respectfully submitted,



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(615) 254-2291

Attorneys for Google Fiber Tennessee, LLC

Date: July 20, 2018

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE**

IN RE:)
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APPLICATION OF GOOGLE FIBER)
TENNESSEE, LLC FOR A STATE-ISSUED) **Docket No. 14-00145**
CERTIFICATE OF FRANCHISE AUTHORITY)

**AFFIDAVIT OF JILL SZUCHMACHER IN SUPPORT OF
GOOGLE FIBER TENNESSEE, LLC'S REQUEST FOR
EXTENSION OF TIME TO MEET DEPLOYMENT REQUIREMENTS**

I, Jill Szuchmacher, in accordance with the requirements of the Competitive Cable and Video Services Act, Tenn. Code Ann. § 7-59-301, *et seq.* ("Act"), state as follows:

1. I am the Manager of Google Fiber Tennessee, LLC ("Google Fiber") and the Director of Network Deployment and Operations of Google Fiber Inc., and I am authorized to make this affidavit on behalf of Google Fiber.

2. I am submitting this affidavit in support of Google Fiber's request for an extension of time to meet the deployment requirements in Tenn. Code Ann. § 7-59-311(b).

3. On November 21, 2014, Google Fiber submitted to the Tennessee Regulatory Authority (now the Tennessee Public Utility Commission) ("Commission") an application for a state-issued certificate of franchise authority to provide video services in the service area encompassed by the Metropolitan Government of Nashville and Davidson County, excluding the areas comprised of the incorporated satellite cities ("Franchise Area").

4. On February 9, 2015, the Commission granted Google Fiber a Certificate of Franchise Authority ("Certificate") to provide cable or video services in the Franchise Area. To

the best of my knowledge, Google Fiber is the first video service provider to build a new network in Tennessee since the Act's passage.

5. Google Fiber immediately commenced the process of developing and building its network to deliver video services in the Franchise Area. It negotiated leases for its network equipment, pole attachment agreements, hired contractors to design and build the network, and began the process of building its network.

6. Google Fiber also began seeking permits to install and deploy its lines and facilities in public-rights-of-way in the Franchise Area. Google Fiber has met with representatives from Metro Nashville on a regular basis concerning permits and issues related to access to public-rights-of-way.

7. Despite these substantial and continuous efforts, the process of building a fiber network throughout the Franchise Area has been slow and has faced numerous obstacles. One of the major obstacles has been gaining timely access to space on poles to install fiber lines. The process to install a line on a pole often requires each current pole occupant to move its attachments one by one, with multiple crews entering the public right-of-way and working on the pole at different times to make the pole ready for Google Fiber's fiber line. To attach a fiber line to any individual pole can take many months. To build Google Fiber's network aerially throughout the Franchise Area using poles requires access to tens of thousands of poles and, at this rate of access, would take many years. Thus, delays in making the poles ready to attach Google Fiber's lines have caused substantial delays deploying Google Fiber's network.

8. Because of the impact on public safety of repeatedly entering public rights-of-way, the Metro Nashville Council, in late September 2016, adopted a "One Touch Make Ready" ("OTMR") ordinance to reduce the number of times a pole needed to be accessed to move

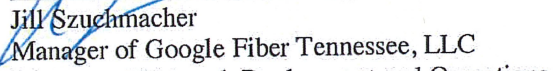
attachments and install new lines. Fewer trips would also speed up the attachment of fiber lines to the poles. However, less than a month after adoption, multiple lawsuits were filed challenging the legality of the OTMR ordinance. In January 2018, almost a year and half after the lawsuits were filed, the federal district court issued its final opinion invalidating the OTMR ordinance. This litigation surrounding pole attachments further delayed Google Fiber's deployment.

9. As a result of the lawsuits and the slow pole attachment process, Google Fiber has increasingly used shallow trenching to bury lines in the ground in order to more efficiently provide service. In total, Google Fiber has pulled more than 27,000 permits to deploy fiber lines using all techniques.

10. Google Fiber continues to actively build its network to deploy fiber lines and will continue to do so in the Franchise Area to expand access. Google Fiber meets almost weekly with Metro Nashville Department of Public Works related to network deployment.

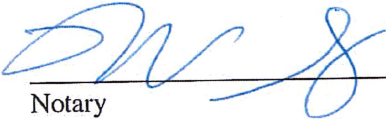
11. In addition, Google Fiber can confirm to the Commission that it has met Tenn. Code Ann. § 7-59-311's twenty-five percent (25%) low-income household deployment requirement.

12. Because of the delays in obtaining access to space on poles and because of factors outside Google Fiber's control, such as lawsuits challenging the legality of OTMR, Google Fiber will not be able to provide access to at least thirty percent (30%) of the households in its Franchise Area by August 9, 2018, pursuant to Tenn. Code Ann. § 7-59-311(d). Google Fiber hereby seeks a twenty-four (24) month extension of time to meet the requirement in Tenn. Code Ann. § 7-59-311(b) within Google Fiber's Franchise Area.


Jill Szuchmacher
Manager of Google Fiber Tennessee, LLC
Director of Network Deployment and Operations

New York
STATE OF ~~CALIFORNIA~~)
New York)
COUNTY OF ~~SANTA CLARA~~)

Sworn to and subscribed before me July 19th, 2018.


Notary

My commission expires: 5/18/2019

MICHAEL ALLEN PLUMP
Notary Public, State of New York
Qualified in New York County
No. 01PL6327871
My Commission Expires 05/18/2019