



**D. Austin Rueschhoff**  
**Associate**  
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February 9, 2018

**VIA EMAIL** [tpuc.docketroom@tn.gov](mailto:tpuc.docketroom@tn.gov)

Chairman, Tennessee Public Utility  
Commission  
c/o Sharla Dillon  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, Tennessee 37243

**RE: Docket No. 18-00008, Application of Vero Fiber Networks, LLC**

Dear Ms. Dillon:

I enclose the following documents responsive to the Tennessee Public Utility Commission's Data Request dated January 25, 2018 for the above-referenced Application for filing with the Tennessee Public Utility Commission (original, plus four (4) copies).

1. Confidential Response to Data Request #1
2. Public Version of Response to Data Request #1
3. Vero Fiber Networks, LLC's Surety Bond

Thank you for your courtesy. Please contact us with any questions or concerns that you may have.

Warmest regards,

A handwritten signature in black ink, reading "D. Austin Rueschhoff".

D. Austin Rueschhoff

DAR/kec

Enclosures

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**Holland & Hart LLP**

**Phone** [303] 290-1600 **Fax** [303] 290-1606 [www.hollandhart.com](http://www.hollandhart.com)

6380 South Fiddlers Green Circle Suite 500 Greenwood Village, CO 80111

Aspen Boulder Carson City Colorado Springs Denver Denver Tech Center Billings Boise Cheyenne Jackson Hole Las Vegas Reno Salt Lake City Santa Fe Washington, D.C. ☎

**VERO FIBER NETWORKS, LLC RESPONSE TO TENNESSEE PUBLIC UTILITY  
COMMISSION DATA REQUEST DATED JANUARY 25, 2018 – PUBLIC VERSION**

On January 25, 2018, the Tennessee Public Utility Commission requested Vero Fiber Networks, LLC to:

- 1) Detail the partner contributions and the long term debt listed in the confidential financial statements provided under seal with the application. Identify the partners also.***

Vero Fiber Networks, LLC considers its responsive financial information to contain trade secrets and commercially sensitive material. Therefore, Vero Fiber Networks has submitted the responsive financial information under seal.

# TENNESSEE REGULATORY AUTHORITY

## TENNESSEE TELECOMMUNICATIONS SERVICE PROVIDER'S SURETY BOND

Bond #: 52BSBGG5495

**WHEREAS**, Vero Fiber Networks, LLC (the "Principal"), has applied to the Tennessee Regulatory Authority for authority to provide telecommunications services in the State of Tennessee; and

**WHEREAS**, under the provisions of Title 65, Chapter 4, Section 125(j) of the Tennessee Code Annotated, as amended, the Principal is required to file this bond in order to obtain such authority and to secure the payment of any monetary sanction imposed in any enforcement proceeding brought under Title 65 of the Tennessee Code Annotated or the Consumer Telemarketing Act of 1990 by or on behalf of the Tennessee Regulatory Authority (the "TRA"); and

**WHEREAS**, Hartford Fire Insurance Company (the "Surety"), a corporation licensed to do business in the State of Tennessee and duly authorized by the Tennessee Commissioner of Insurance to engage in the surety business in this state pursuant to Title 56, Chapter 2 of the Tennessee Code Annotated, has agreed to issue this bond in order to permit the Principal to comply with the provisions of Title 65, Chapter 4, Section 125(j) of the Tennessee Code Annotated;

NOW THEREFORE, BE IT KNOWN, that we the Principal and the Surety are held and firmly bound to the STATE OF TENNESSEE, in accordance with the provisions of Tennessee Code Annotated, Title 65, Chapter 4, Section 125(j), in the full amount of twenty thousand dollars (\$20,000.00) lawful money of the United States of America to be used for the full and prompt payment of any monetary sanction imposed against the Principal, its representatives, successors or assigns, in any enforcement proceeding brought under Title 65 of Tennessee Code Annotated or the Consumer Telemarketing Act of 1990, by or on behalf of the TRA, for which obligation we bind ourselves, our representatives, successors and assigns, each jointly and severally, firmly and unequivocally by these presents.

This bond shall become effective on the 8th day of February, 2018, and shall be continuous; provided, however, that each annual renewal period or portion thereof shall constitute a new bond term. Regardless of the number of years this bond may remain in force, the liability of the Surety shall not be cumulative, and the aggregate liability of the Surety for any and all claims, suits or actions under this bond shall not exceed Twenty Thousand Dollars (\$20,000.00). The Surety may cancel this bond by giving thirty (30) days written notice of such cancellation to the TRA and Principal by certified mail, it being understood that the Surety shall not be relieved of liability that may have accrued under this bond prior to the date of cancellation.

### PRINCIPAL

### SURETY

Vero Fiber Networks, LLC

Hartford Fire Insurance Company

Name of Company authorized by the TRA

Name of Surety

One Hartford Plaza Hartford, CT 06155-0001

Company ID # as assigned by TRA

Address of Surety

SIGNATURE OF PRINCIPAL

SIGNATURE OF SURETY AGENT

[Signature]  
Name: Zach Neborski  
Title: COO



[Signature]  
Name: Brian Peters  
Title: Attorney-in-Fact

Address of Surety Agent:

One Hartford Plaza  
Hartford, CT 06155-0001

THIS BOND IS ISSUED IN ACCORDANCE WITH THE PROVISIONS OF SECTION 125, CHAPTER 4, TITLE 65 OF THE TENNESSEE CODE ANNOTATED AS AMENDED BY CHAPTER NO. 586, 2000 PUBLIC ACTS. SHOULD THERE BE ANY CONFLICT WITH THE TERMS HEREOF AND THE STATUTE OR REGULATIONS PROMULGATED THEREUNDER, THE STATUTE OR REGULATIONS SHALL PREVAIL. (POWER OF ATTORNEY FROM AN APPROVED INSURANCE COMPANY MUST BE ATTACHED.)

### ACKNOWLEDGMENT OF PRINCIPAL

STATE OF  
COUNTY OF

Colorado

Before me, a Notary Public of the State and County aforesaid, personally appeared Zack Hebergall with whom I am personally acquainted and who, upon oath, acknowledged himself to be the individual who executed the foregoing bond on behalf of Vero Fiber Networks, LLC, and he acknowledged to me that he executed the same.

WITNESS my hand and seal this 9<sup>TH</sup> day of February, 2018.

My Commission Expires:

June 27

2020

HALEY MORELAND  
NOTARY PUBLIC  
STATE OF COLORADO  
NOTARY ID 20164024262  
MY COMMISSION EXPIRES JUNE 27, 2020

[Signature]  
Notary Public

### ACKNOWLEDGMENT OF SURETY

STATE OF Connecticut  
COUNTY OF Hartford

Before me, a Notary Public of the State and County aforesaid, personally appeared Brian Peters with whom I am personally acquainted and who, upon oath, acknowledged himself to be the individual who executed the foregoing bond on behalf of Hartford Fire Insurance Company, the within named Surety, a corporation licensed to do business in the State of Tennessee and duly authorized by the Tennessee Commissioner of Insurance to engage in the surety business in this state pursuant to Title 56, Chapter 2 of the Tennessee Code Annotated, and that he as such an individual being authorized to do so, executed the foregoing bond, by signing the name of the corporation by himself and as such individual.

WITNESS my hand and seal this 8th day of February, 2018.

My Commission Expires:

December 31

2021

[Signature]  
Notary Public  
Joshua Sanford

**JOSHUA SANFORD**  
**NOTARY PUBLIC - 173058**  
MY COMMISSION EXPIRES DEC. 31, 2021

### APPROVAL AND INDORSEMENT

This is to certify that I have examined the foregoing bond and found the same to be sufficient and in conformity to law, that the sureties on the same are good and worth the penalty thereof, and that the same has been filed with the Tennessee Regulatory Authority, State of Tennessee, this \_\_\_\_\_ day of \_\_\_\_\_.

\_\_\_\_\_  
Name:  
Title:

# POWER OF ATTORNEY

Direct Inquiries/Claims to:

**THE HARTFORD**

Bond T-12

One Hartford Plaza

Hartford, Connecticut 06155

[Bond.Claims@thehartford.com](mailto:Bond.Claims@thehartford.com)

call: 888-266-3488 or fax: 860-757-5835)

Agency Code: SurePath

KNOW ALL PERSONS BY THESE PRESENTS THAT:

- ☒ Hartford Fire Insurance Company, a corporation duly organized under the laws of the State of Connecticut  
☐ Hartford Casualty Insurance Company, a corporation duly organized under the laws of the State of Indiana  
☐ Hartford Accident and Indemnity Company, a corporation duly organized under the laws of the State of Connecticut  
☐ Hartford Underwriters Insurance Company, a corporation duly organized under the laws of the State of Connecticut  
☐ Twin City Fire Insurance Company, a corporation duly organized under the laws of the State of Indiana  
☐ Hartford Insurance Company of Illinois, a corporation duly organized under the laws of the State of Illinois  
☐ Hartford Insurance Company of the Midwest, a corporation duly organized under the laws of the State of Indiana  
☐ Hartford Insurance Company of the Southeast, a corporation duly organized under the laws of the State of Florida

having their home office in Hartford, Connecticut (hereinafter collectively referred to as the "Companies") do hereby make, constitute and appoint

**Brian Peters of Denver, CO**

their true and lawful Attorney-in-Fact, to sign its name as surety(ies) only as delineated above by ☒, and to execute, seal and acknowledge the following bond, undertaking, contract or written instrument:

Bond No. 52BSBG5495

on behalf of Vero Fiber Networks, LLC

State of Tennessee

naming  
as Obligor in the amount of See Bond Form

on behalf of the Companies in their business of guaranteeing the fidelity of persons, guaranteeing the performance of contracts and executing or guaranteeing bonds and undertakings required or permitted in any actions or proceedings allowed by law.

In Witness Whereof, and as authorized by a Resolution of the Board of Directors of the Companies on May 6, 2015 the Companies have caused these presents to be signed by its Senior Vice President and its corporate seals to be hereto affixed, duly attested by its Assistant Secretary. Further, pursuant to Resolution of the Board of Directors of the Companies, the Companies hereby unambiguously affirm that they are and will be bound by any mechanically applied signatures applied to this Power of Attorney.



*John Gray*

John Gray, Assistant Secretary

*M. Ross Fisher*

M. Ross Fisher, Senior Vice President

STATE OF CONNECTICUT

ss. Hartford

COUNTY OF HARTFORD

On this 11th day of January, 2016, before me personally came M. Ross Fisher, to me known, who being by me duly sworn, did depose and say: that he resides in the County of Hartford, State of Connecticut; that he is the Senior Vice President of the Companies, the corporations described in and which executed the above instrument; that he knows the seals of the said corporations; that the seals affixed to the said instrument are such corporate seals; that they were so affixed by authority of the Boards of Directors of said corporations and that he signed his name thereto by like authority.



*Kathleen T. Maynard*

Kathleen T. Maynard  
Notary Public

My Commission Expires July 31, 2021

## CERTIFICATE

I, the undersigned, Assistant Vice President of the Companies, DO HEREBY CERTIFY that the above and foregoing is a true and correct copy of the Power of Attorney executed by said Companies, which is still in full force effective as of February 8, 2018

Signed and sealed at the City of Hartford.



*Kevin Heckman*

Kevin Heckman, Assistant Vice President

Telephone: 860-241-4496  
Website: [www.willistowerswatson.com](http://www.willistowerswatson.com)  
E-mail: [Brian.Peters@willistowerswatson.com](mailto:Brian.Peters@willistowerswatson.com)

February 8, 2018

Vero Fiber Networks, LLC  
Attn: Greg Friedman  
1023 Walnut Street, Suite 100  
Boulder, CO 80302

RE: ***Bond Number: 52BSBG5495***  
***Obligee: State of Tennessee***  
***Description: TN Telecommunications Service Provider's Bond***

Attached is the completed document per your request. This was issued based upon the information you provided to our office and we urge you to check all of the information for accuracy (i.e. Power of Attorney, signatures, dates, amounts, description, etc.).

Please verify that the form attached is the form required and complete the execution with the proper signature(s) and seal.

If a premium is charged, our invoice will follow under a separate cover. Please note the premium payment for this bond is due upon receipt.

Thank you for the opportunity to service your surety needs. Should you have any questions, please do not hesitate to contact any member of your Willis Towers Watson Surety Team.

Sincerely,

Brian Peters