



Henry Walker
Direct: 615.252.2363
Fax: 615.252.6363
hwalker@babco.com

April 15, 2020

Hon. Robin L. Morrison, Chairman
c/o Ectory Lawless, Docket Room Manager
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243

Re: Application of Full Tilt Communications, LLC for a Certificate of Convenience and Necessity, TPUC Docket No. 20-00055

Dear Chairman Morrison:

Enclosed please find the *Application of Full Tilt Communications, LLC for a Certificate of Convenience and Necessity* to offer telecommunications services in Tennessee. Also enclosed is a check in the amount of \$25.00. Please note that the Application includes one Exhibit being submitted **UNDER SEAL** as **CONFIDENTIAL and PROPRIETARY**. Both a public version and a nonpublic, **CONFIDENTIAL** version of the Exhibit are attached.

I am filing this Application electronically with a hard copy, which includes the filing fee, to follow.

The Applicant is a wholly owned subsidiary of Vero Fiber Networks, LLC which has a certificate of convenience and necessity to provide telecommunications services in Tennessee and, as described herein, will provide financial, technical and managerial support for Full Tilt Communications, LLC.

Please contact me if you have any questions about this application.

Sincerely,

BRADLEY ARANT BOULT CUMMINGS LLP

By:

A handwritten signature in blue ink, appearing to read "Henry Walker", written over a horizontal line.

Henry Walker

HW/ads
Attachment

4835-0555-1034.1
216780-301001

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

Application of)	
)	
)	Docket No. 20-00055
Full Tilt Communications, LLC)	
)	
For a Certificate to Provide)	
Competing Local Telecommunications)	
Services)	
)	

**APPLICATION OF FULL TILT COMMUNICATIONS, LLC TO PROVIDE
COMPETING LOCAL TELECOMMUNICATIONS SERVICES**

Full Tilt Communications, LLC, (“Full Tilt” or “Applicant”) respectfully requests that the Tennessee Public Utility Commission (the “Commission”) grant to Full Tilt a certificate of convenience and necessity to provide competing local telecommunications services within the State of Tennessee. Full Tilt is willing and able to comply with all applicable Commission policies, rules and orders pertaining to the provision of competing local telecommunications services.

Applicant submits the following information in support of its Application:

1. The full name and address of the Applicant is:

Full Tilt Communications, LLC
242 Rangeline Rd
Longwood, FL 32750-4035
(731) 300-6441
www.fulltiltcom.com

Questions regarding this application should be directed to:

Henry M. Walker
Bradley
1600 Division Street, Suite 700
Nashville, TN 37203
Telephone: (615) 252-2363
Fax: (615) 252-6380
Email: hwalker@bradley.com

Gregory Friedman
Full Tilt Communications, LLC
Chief Financial Officer
242 Rangeline Rd
Longwood, FL 32750-4035
(731) 300-6441
fulltiltcommunications@gmail.com

Contact name and address at the Company is:

Gregory Friedman
Full Tilt Communications, LLC
Chief Financial Officer
242 Rangeline Rd
Longwood, FL 32750-4035
(731) 300-6441
fulltiltcommunications@gmail.com

John Real
Full Tilt Communications, LLC
EVP, Product and Sales
242 Rangeline Rd
Longwood, FL 32750-4035
(731) 300-6441
fulltiltcommunications@gmail.com

2. Organizational Chart of Business Structure: Include any pertinent acquisition or merger information

Applicant is a wholly owned subsidiary of Vero Fiber Networks, LLC, a licensed and certificated company within the State of Tennessee. See Docket 18-00008. Applicant does not have any affiliates, or subsidiaries. A copy of Applicant's Organizational Chart is attached hereto as **Exhibit A**.

3. Corporate Information

Applicant is a Delaware limited liability company organized on August 15, 2019. See Certificate of Formation in **Exhibit B**. A copy of Applicant's authority to transact business in the State of Tennessee is provided in **Exhibit C**. The names and addresses of the principal corporate officers are in **Exhibit D**. There are no officers in Tennessee. The biographies of the principal officers and any other key technical staff are in **Exhibit E**.

4. Applicant possesses the managerial, technical, and financial ability to provide local telecommunications service in the State of Tennessee as demonstrated below

A. Financial Qualifications

Applicant has the financial ability to render the local exchange telecommunications services for which this Application is submitted. In support of its financial qualifications, Applicant submits the pro forma financial report of its corporate parent, on a confidential basis, provided in **Confidential Exhibit F**. Because Applicant is a privately held company, Applicant requests that the financial statements appended hereto as Exhibit F be treated as confidential.

In accordance with T.C.A. § 65-4-125(j), Applicant will submit a corporate surety bond or irrevocable letter of credit, as applicable, prior to providing service.

B. Managerial Ability:

As previously shown on **Exhibit E** of this Application, Applicant has the managerial expertise to successfully operate a telecommunications enterprise in Tennessee. Applicant's management team has extensive management and business experience in telecommunications.

C. Technical Qualifications

Applicant will satisfy the standards established by the Commission, including quality of service and billing standards required of all LEC's regulated by the agency. As noted in the biographies in **Exhibit E**, the principal officers of the company include many individuals with several years of telecommunications expertise. Thus, Applicant is technically qualified to provide local exchange service in Tennessee.

5. Proposed Service Areas

Applicant seeks authority to provide local exchange telecommunications services on a statewide basis.

6. Types of Service to be Provided

Applicant seeks authority to enter the Tennessee market as a provider of limited facilities-based local exchange service, specifically by primarily providing broadband and video services to schools and libraries through the federal E-rate program, and to other persons and businesses in Tennessee. Applicant intends to deliver an aggregation of technologies utilizing fiber optic cable depending on the customer's location and needs. If requested by a customer and if financially feasible, the Applicant will also offer TDM telephone service through a special contract with the customer.

7. Repair and Maintenance

Applicant understands the importance of effective customer service for local service customers. Applicant will make arrangements for its customers to call the company at (800) 691-8376, its toll-free customer service number. In addition, customers will be able to contact the company in writing at the headquarters address, as well as via email. The toll-free number will be provided on each customer's agreement for services. The customer service contact person knowledgeable about Applicant's operations is John Real, EVP. Mr. Real's mailing address, telephone number, and email address are in Section 1 of this Application.

8. Small and Minority-Owned Telecommunications Business Participation Plan (T.C.A. § 65-5-112):

See **Exhibit G**.

9. Toll Dialing Parity Plan:

Should the Applicant provide TDM telephone service at the request of a customer, the Applicant will provide toll dialing parity.

10. Notice of Filing:

Applicant has served notice of this Application on the seventeen (17) incumbent local exchange telephone companies in Tennessee with a statement regarding the company's intention of operating geographically. See **Exhibit H** for the Notice of Filing and list of carriers served.

11. Numbering Issues:

Should the Applicant provide TDM telephone service at the request of a customer, the Applicant will comply with the Commission's rules on number assignment and conservation.

12. Tennessee Specific Operational Issues:

Questions 1-4 concerning Tennessee Specific Operational Issues are not applicable to the broadband services Applicant intends to offer. Should the Applicant provide TDM telephone service at the request of a customer, the Applicant will comply with all Commission operational requirements, including those listed here. Gregory Friedman will be responsible to work with the Commission on resolving customer complaints. His contact information is in Section 1 of this Application. Applicant does not intend to telemarket its services in Tennessee.

13. Miscellaneous:

- a.** Sworn Pre-Filed Testimony: **Exhibit I.**
- b.** Applicant will not require customer deposits.
- c.** As a recently-formed entity, Applicant is not authorized to operate in any other state. Applicant has not been denied requested certification in any jurisdiction. Applicant has not been subject to complaints in any of the states in which it is now seeking to do business.
- d.** Subsequent to the approval of this Application, Applicant will file any necessary tariffs prior to providing the proposed services covered by this Application.

CONCLUSION

Grant of the Application will further the goals of the Tennessee Legislature and further the public interest by expanding the availability of competitive telecommunications services in the State of Tennessee. In addition, intrastate offering of these services is in the public interest because the services will provide Tennessee customers increased efficiencies and cost savings. Authorizing Applicant to provide telecommunications services will enhance materially the telecommunications infrastructure in the State of Tennessee and will facilitate economic development.

Full Tilt respectfully requests that the Commission enter an order granting it a certificate of convenience and necessity to operate as a competing telecommunications service provider and authority to provide a full range of local exchange services on a facilities-based and resale basis throughout the State of Tennessee. Full Tilt also respectfully requests expedited treatment for approval of its application. For the reasons stated above, Full Tilt's provision of these services would promote the public interest by providing high-quality service at competitive prices and by creating greater economic incentives for the development and improvement for all competing providers.



Friedman docs.pdf

DocVerify ID: E9873A54-0F43-4C78-BE37-2E8F8BF8D379
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E-Signature Summary

E-Signature 1: Gregory Alan Friedman (GF)

April 15, 2020 13:28:40 -8:00 [B9A65EAD0EF0] [10.0.0.5]
gfriedman@veronetworks.com (Principal)

E-Signature Notary: Stephanie covington (Sgc)

April 15, 2020 13:28:40 -8:00 [65B94137B462] [10.0.0.5]
sgcovington@bradley.com
I, Stephanie covington, did witness the participants named above electronically sign this document.



**VERIFICATION AND SWORN STATEMENT ON BEHALF OF
FULL TILT COMMUNICATIONS, LLC**

My name is Gregory Friedman. I am the Chief Financial Officer of Full Tilt Communications, LLC ("Full Tilt" or "Applicant"). My personal knowledge of the facts stated herein has been derived from my employment with Applicant.

I affirm that Full Tilt Communications, LLC:

- agrees to comply with all federal and state statutes, rules, and regulations for a Certificate to Provide Competing Local Telecommunications Services, if granted the request as stated in this Applications;
- certifies that all answers to the attached Applications are true and correct; and

I affirm and declare under penalty of perjury under the laws of the State of Tennessee, that, to the best of my knowledge, all of the statements and representations made in this Application are true and correct.

Dated: 04/15/2020

Gregory Alan Friedman
Signed on 2020/04/15 13:28:40 -8:00

Gregory Friedman
Chief Financial Officer

State of Tennessee
County of Davidson

Subscribed and sworn to me a, Notary Public

(Title of person authorized to administer oath)

In the State and County above named this 15th day of April, 2020.

(Signature of person authorized to administer oath)



Stephanie covington
Signed on 2020/04/15 13:28:40 -8:00



EXHIBIT A

Organizational Chart of Business Structure

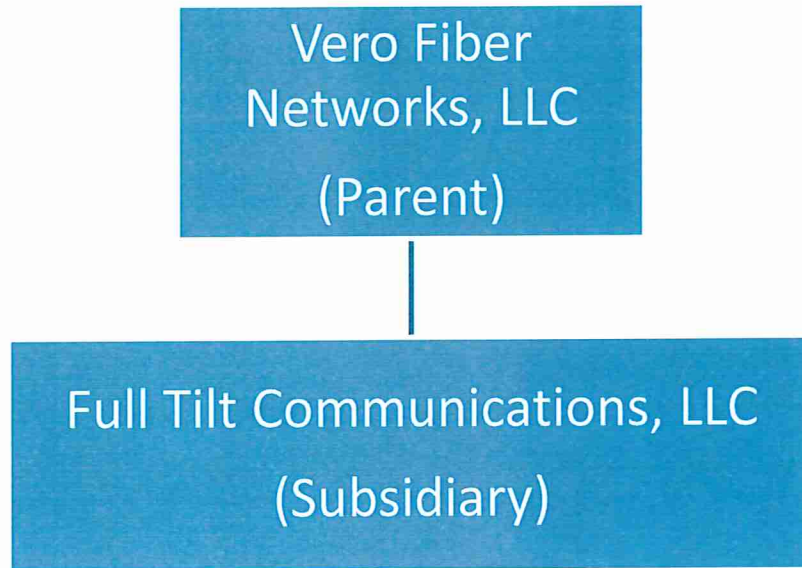


EXHIBIT B

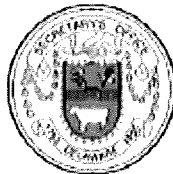
Certificate of Formation

Delaware

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF
DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT
COPY OF THE CERTIFICATE OF FORMATION OF "FULL TILT
COMMUNICATIONS, LLC", FILED IN THIS OFFICE ON THE FIFTEENTH DAY
OF AUGUST, A.D. 2019, AT 10:36 O'CLOCK A.M.



7563217 8100
SR# 20196531722

You may verify this certificate online at corp.delaware.gov/authver.shtml

A handwritten signature in black ink, appearing to read "JBULLOCK", is written over a horizontal line. Below the line, the text "Jeffrey W. Bullock, Secretary of State" is printed in a small font.

Authentication: 203420483
Date: 08-16-19

State of Delaware
Secretary of State
Division of Corporations
Delivered 10:36 AM 08/15/2019
FILED 10:36 AM 08/15/2019
SR 20196531722 - File Number 7563217

STATE OF DELAWARE
CERTIFICATE OF FORMATION
OF LIMITED LIABILITY COMPANY

The undersigned authorized person, desiring to form a limited liability company pursuant to the Limited Liability Company Act of the State of Delaware, hereby certifies as follows:

1. The name of the limited liability company is Full Tilt Communications, LLC
2. The Registered Office of the limited liability company in the State of Delaware is located at 251 Little Falls Drive (street), in the City of Wilmington, Zip Code 19808. The name of the Registered Agent at such address upon whom process against this limited liability company may be served is Corporation Service Company

By: 
Authorized Person

Name: Greg Friedman
Print or Type

EXHIBIT C

Authority to Transact Business in Tennessee



Tre Hargett
Secretary of State

Division of Business Services
Department of State
State of Tennessee
312 Rosa L. Parks AVE, 6th FL
Nashville, TN 37243-1102

COMPLIANCE SOLUTIONS, INC.
DAVID RESH
242 RANGELINE ROAD
LONGWOOD, FL 32750

September 3, 2019

Request Type: Certificate of Existence/Authorization
Request #: 0328557

Issuance Date: 09/03/2019
Copies Requested: 1

Document Receipt

Receipt #: 004999141

Filing Fee: \$20.00

Payment-Credit Card - State Payment Center - CC #: 3764913335

\$20.00

Regarding: Full Tilt Communications, LLC
Filing Type: Limited Liability Company - Foreign
Formation/Qualification Date: 08/29/2019
Status: Active
Duration Term: Perpetual

Control #: 1048626
Date Formed: 08/15/2019
Formation Locale: DELAWARE
Inactive Date:

CERTIFICATE OF AUTHORIZATION

I, Tre Hargett, Secretary of State of the State of Tennessee, do hereby certify that effective as of the issuance date noted above

Full Tilt Communications, LLC

* is a Limited Liability Company formed in the jurisdiction set forth above and is authorized to transact business in this State;

* has paid all fees, interest, taxes and penalties owed to this State (as reflected in the records of the Secretary of State and the Department of Revenue) which affect the existence/authorization of the business;

* has appointed a registered agent and registered office in this State;

* has not filed an Application for Certificate of Withdrawal.

Tre Hargett
Secretary of State

Processed By: Cert Web User

Verification #: 034929838

EXHIBIT D

Names and Addresses of Principle Officers

Applicant's officers are listed below. The business address of the following individuals is:

Full Tilt Communications, LLC
242 Rangeline Rd
Longwood, FL 32750-4035
(731) 300-6441
www.fulltiltcom.com

Pamela Moore
President and Chief Operating Officer
(731) 300-6441
www.fulltiltcom.com

Gregory Friedman
Chief Financial Officer
(731) 300-6441
www.fulltiltcom.com

John Real
EVP, Product and Sales
(731) 300-6441
www.fulltiltcom.com

David Hill
Director of Operations and Outside Plant
(731) 300-6441
www.fulltiltcom.com

EXHIBIT E

Biographies of Principle Officers and Key Technical Staff

Pamela Moore

Pam Moore is the President and Chief Operating Officer of Full Tilt Communications, LLC and the Chief Operating Officer of Vero Fiber Networks, LLC. Pam has 22 years of experience in the telecommunications industry. Before joining Full Tilt, Pam was Principal/Owner of a consulting company advising clients on fiber and data center transactions. Previously, Pam served 8 years at Zayo Group, holding leadership roles in the Ethernet, Long Haul Dark Fiber and datacenter business units. Prior to Zayo, Pam held management roles at ICG and Level 3 Communications. Pam has a BSBA in Finance from the University of Denver and an MBA from Regis University.

Greg Friedman

Greg Friedman is the Chief Operating Officer of Full Tilt Communications and of Vero Fiber Networks, LLC. Greg has 17 years of experience in the telecommunications, financial services and real estate industries. Greg was previously Executive Vice President at Zayo Group, LLC, where he managed all aspects of Zayo's datacenter business (colocation and cloud computing). Prior to that, Greg held various executive roles at Zayo, including CFO of Zayo's Fiber Infrastructure business and Senior Vice President / General Manager of Zayo's Ethernet business, as well as management positions at Level 3 Communications, Deloitte, and Cap Gemini. He received a BS in Economics from the University of Pennsylvania and an MBA with Honors from the Wharton School.

John Real

John Real is the EVP of Product and Sales for Full Tile Communications and EVP of Vero Fiber Networks, LLC. John has 17 years of experience in the telecommunications industry. Prior to Full Tilt, John spent over seven years at Zayo, holding various executive roles. During his tenure, John was charged with leading various segments of its enterprise sales channel and was responsible for strategic channel relationships, creating and fostering Zayo's relationships with various public and private partners including VARs, Equipment Vendors, Data Centers and Municipalities. During his tenure at Zayo, he also ran the Ethernet Product Group, overseeing all strategic product decisions, P&L, implementation, delivery and engineering. Prior to Zayo, John spent 3 years as CEO of VoicePipe, an internet and telephony provider that was acquired by Zayo in 2007. John started his telecom career at ICG Communications.

David Hill

David Hill is the Director of Operations and Outside Plant at Full Tilt Communications and a Director of Operations at Vero Fiber Networks, LLC. David has over 32 years of Network Engineering and Operations experience in the wireline and wireless industries. Prior to joining Full Tilt, he worked at Zayo Group for 6 years holding several Operations and Implementation positions the most recent of which was as Sr Director of Implementation for the South Region Fiber Solutions group. David has also held senior and leadership positions with Atlantic Tower, Segra, Lightsquared, Ericsson, Sprint, Nextel, BellSouth Mobility, and BellSouth. David earned a BSEE and an MBA from the University of South Carolina and is a licensed Residential Builder.

PUBLIC EXHIBIT F

Applicant submitted its confidential financial information to the Tennessee Public Utility Commission under seal as Confidential Exhibit F.

**SMALL AND MINORITY-OWNED TELECOMMUNICATIONS
BUSINESS PARTICIPATION PLAN
FULL TILT COMMUNICATIONS, LLC**

Pursuant to T.C.A. § 65-5-112, as amended, Full Tilt Communications, LLC (“Full Tilt”) submits this small and minority-owned telecommunications business participation plan (the “Plan”) along with its Application for a Certificate of Public Convenience and Necessity to provide competing intrastate and local exchange services in Tennessee.

I. PURPOSE

The purpose of § 65-5-112, T.C.A. is to provide opportunities for small and minority-owned businesses to provide goods and services to telecommunications service providers. Full Tilt is committed to the goals of § 65-5-112, T.C.A. and to taking steps to support the participation of small and minority-owned telecommunications businesses in the telecommunications industry. Full Tilt will endeavor to provide opportunities for small and minority-owned telecommunications businesses to compete for contracts and subcontracts for goods and services. As part of its procurement process, Full Tilt will make efforts to identify and inform minority-owned and small businesses that are qualified and capable of providing goods and services to Full Tilt of such opportunities. Once it begins operations, Full Tilt will contact the Department of Economic and Community Development, the administrator of the small and minority owned Telecommunications assistance program, to obtain a list of qualified vendors. Moreover, Full Tilt will seek to increase awareness of such opportunities so that companies not otherwise identified will have sufficient information to participate in the procurement process.

II. DEFINITIONS

As defined in § 65-5-112, T.C.A.:

Minority-Owned Business. Minority-owned business shall mean a business which is solely owned, or at least fifty-one percent (51%) of the assets or outstanding stock of which is owned, by an individual who personally manages and controls daily operations of such business, and who is impeded from normal entry into the economic mainstream because of race, religion, sex or national origin and such business has annual gross receipts of less than four million dollars (\$4,000,000).

Small Business. Small Business shall mean a business with annual gross receipts of less than four million dollars (\$4,000,000).

III. ADMINISTRATION

Full Tilt’s Plan will be overseen and administered by the individual named below, hereinafter referred to as the Administrator, who will be responsible for carrying out and promoting Full Tilt’s full efforts to provide equal opportunities for small and minority owned businesses. The Administrator of the Plan will be:

Gregory Friedman
Full Tilt Communications, LLC
Chief Financial Officer
PO Box 773811
Steamboat Springs, CO 80477
(731) 300-6441
fulltiltcommunications@gmail.com

The Administrator's responsibilities will include:

- (1) Maintaining an updated Plan in full compliance with T.C.A. § 65-5-112 and the rules and orders of the Tennessee Regulatory Authority.
- (2) Establishing and developing policies and procedures necessary for the successful implementation of the Plan.
- (3) Preparing and submitting such forms as may be required by the Tennessee Regulatory Authority, including the filing of required annual updates.
- (4) Serving as the primary liaison to and cooperating with the Tennessee Regulatory Authority, other agencies of the State of Tennessee, and small and minority-owned businesses to locate and use qualified small and minority-owned businesses as defined in T.C.A. § 65-5-112.
- (5) Searching for and developing opportunities to use small and minority-owned businesses and encouraging such businesses to participate in and bid on contracts and subcontracts.
- (6) Providing records and reports and cooperating in any authorized surveys as required by the Tennessee Regulatory Authority.
- (7) Establishing a record-keeping system to track qualified small and minority-owned businesses and efforts to use such businesses.
- (8) Providing information and educational activities to persons within Full Tilt and training such persons to seek out, encourage, and promote the use of small and minority owned businesses. In performance of these duties, the Administrator will utilize a number of resources, including:

Chambers of Commerce
The Tennessee Department of Economic and Community Development
The United States Department of Commerce
Small Business Administration
Office of Minority Business
The National Minority Supplier Development Counsel
The National Association of Women Business Owners
The National Association of Minority Contractors
Historically Black Colleges, Universities, and Minority Institutions

The efforts to promote and ensure equal opportunities for small and minority-owned businesses are primarily spelled out in the Administrator's duties above. Additional efforts to provide opportunities to small and minority-owned businesses will include offering, where appropriate and feasible, small and minority-owned businesses assistance with technical, insurance, bonding, licensing, production, and deadline requirements.

IV. RECORDS AND COMPLIANCE REPORTS

Full Tilt will maintain records of qualified small and minority-owned business and efforts to use the goods and services of such businesses. In addition, Full Tilt will maintain records of educational and training activities conducted or attended and of the internal procurement procedures adopted to support this plan.

Full Tilt will submit records and reports required by the Tennessee Regulatory Authority concerning the Plan. Moreover, Full Tilt will cooperate fully with any surveys and studies required by the Tennessee Regulatory Authority.

By: Gregory Friedman
Administrator

Dated: January 1, 2020

EXHIBIT H
BEFORE THE TENNESSEE REGULATORY AUTHORITY

Application of)	
)	
)	
Full Tilt Communications, LLC)	Application No. _____
)	
For a Certificate to Provide)	
Competing Local Telecommunication)	
Services)	
)	

NOTICE OF FILING

TO: ALL INCUMBENT LOCAL EXCHANGE CARRIERS (ILECs)

PLEASE TAKE NOTICE, that in accordance with the Tennessee Regulatory Authority Rules for the Provision of Competitive Intrastate Telecommunications Services, you are hereby given notice that on April 14, 2020, Full Tilt Communications, LLC filed an Application for a Certificate of Public Convenience and Necessity to Provide Competing Local Telecommunications Services. Full Tilt Communications, LLC intends to operate within the entire state of Tennessee.

April 14, 2020

Gregory Friedman,
Chief Financial Officer

Incumbent Local Exchange Carriers (ILEC s)

ID	Company Name	237 N. 8th Street	Mayfield	KY	42066-0000
21	Ardmore Telephone Company	237 N. 8th Street	Mayfield	KY	42066-0000
1	BellSouth Telecommunications, LLC	333 Commerce Street	Nashville	TN	37201-3300
14	CenturyTel of Adamsville	1100 3rd Avenue N.	Nashville	TN	37208-0000
15	CenturyTel of Claiborne	1100 3rd Avenue N.	Nashville	TN	37208-0000
17	CenturyTel of Ooltewah-Collegedale	1100 3rd Avenue N.	Nashville	TN	37208-0000
13	Concord Telephone Exchange, Inc.	10025 Investment Drive	Knoxville	TN	37932-0000
16	Crockett Telephone Company	PO Box 24207	Jackson	MS	39225-0000
74668	Frontier Communications of Tennessee	300 Bland Street	Bluefield	WV	24701-0000
22	Humphreys County Telephone Company	10025 Investment Drive	Knoxville	TN	37932-0000
23	Loretto Telephone Company	P. O. Box 130	Loretto	TN	38469-0000
24	Millington Telephone Company, Inc.	PO Box 17040	Jonesboro	AR	72403-0000
18	Peoples Telephone Company	PO Box 24207	Jackson	MS	39225-0000
12	Tellico Telephone Company	10025 Investment Drive	Knoxville	TN	37932-0000
11	Tennessee Telephone Company	10025 Investment Drive	Knoxville	TN	37932-0000
25	United Telephone Company, Inc.	P. O. Box 38	Chapel Hill	TN	37034-0000
3	United Telephone Southeast, LLC	1101 3rd Avenue North	Nashville	TN	37208-0000
19	West Tennessee Telephone Co.	PO Box 24207	Jackson	MS	39225-0000

BEFORE THE TENNESSEE REGULATORY AUTHORITY

Application of)	
)	
)	
Full Tilt Communications, LLC)	Application No. _____
)	
For a Certificate to Provide)	
Competing Local Telecommunication)	
Services)	
)	

DIRECT TESTIMONY OF GREGORY FRIEDMAN ON

BEHALF OF FULL TILT COMMUNICATIONS, LLC

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND TELEPHONE NUMBER.

A. My name is Greg Friedman. My business address is 242 Rangeline Road, Longwood, FL 32750-4035. My business telephone number is (731) 300-6441.

Q. WHAT IS YOUR POSITION WITH FULL TILT COMMUNICATIONS, LLC?

A. I am the Chief Financial Officer of Full Tilt Communications, LLC ("Full Tilt").

Q. ARE ALL STATEMENTS IN FULL TILT'S APPLICATION TRUE AND CORRECT TO THE BEST OF YOUR KNOWLEDGE, INFORMATION, AND BELIEF?

Yes.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. The purpose of my testimony is to describe the services that Full Tilt proposes to offer in Tennessee, and to review issues related to Full Tilt's request for a license to provide such services. My testimony specifically addresses Full Tilt's managerial, technical, and financial competence to provide telecommunications services for which authority is requested, and its compliance with the rules and policies of the Tennessee Regulatory Authority ("TRA").

Q. WHAT AUTHORITY IS FULL TILT SEEKING FROM THE TRA?

A. Full Tilt seeks authority to offer basic local exchange service in all incumbent local exchange carriers' service territories throughout the state of Tennessee.

Q. IS FULL TILT LEGALLY AUTHORIZED TO DO BUSINESS IN TENNESSEE?

A. Yes. Full Tilt is a Delaware Limited Liability Company and has been authorized to do business in Tennessee. Full Tilt's Delaware Certificate of Formation is attached to its Application as Exhibit B and its authority to transact business in the State of Tennessee is attached to its Application as Exhibit C.

Q. PLEASE DESCRIBE YOUR BACKGROUND IN THE TELECOMMUNICATIONS INDUSTRY.

A. I have 17 years' experience in the telecommunications industry including finance, product management and telecommunications management. Further, the management team at Full Tilt has nearly 90 years of collective experience in the telecommunications industry as demonstrated in **Exhibit E** to Vero's Fiber's Application.

Q. PLEASE DESCRIBE FULL TILT AND THE TYPES OF SERVICES THAT IT WILL PROVIDE IN TENNESSEE.

A. Full Tilt is a is a Delaware limited liability company organized on August 15, 2019, with its headquarters in Longwood, FL. Full Tilt seeks authority to enter the Tennessee market as a provider of limited facilities-based local exchange service, specifically by primarily providing essential broadband and video services to schools and libraries by connecting district locations with fiber optic cable that provides reliable, scaleable, and secure connectivity through the federal E-rate program, and to other persons and businesses in Tennessee. Full Tilt intends to deliver an aggregation of technologies utilizing fiber optic cable depending on the customer's location and needs.

Full Tilt intends to deliver an aggregation of technologies utilizing fiber optic cable depending on the customer's location and needs. Full Tilt will offer leasing of dedicated fiber optic strands to allow schools and libraries to create their own privately-operated fiber optic network. This type of dedicated, purpose-built dark fiber networks are physically separate from other customers and controlled by the end-user. Full Tilt will also provide private lit fiber network for schools and libraries wanting assistance with running their networks and associated equipment.

Full Tilt desires to provide broadband service using fiber optic cabling that is either leased from other providers, placed within existing rights-of-way and/or conduits that are leased from other providers, or constructed within existing rights-of-way or via pole attachment arrangements. Full Tilt may seek to deploy its own facilities in or on existing structures. It is Full Tilt's understanding that without a license, incumbent local exchange carriers have refused to allow entities to use their conduit or poles. It is therefore necessary for Full Tilt to have a license so that it may obtain interconnection agreements with the incumbent local exchange carriers, pole attachment agreements with local utility companies, and franchise agreements and permitting arrangements with local municipalities in Tennessee. If requested by a customer and if financial feasible, the Applicant will also offer TDM telephone service through a special contract with the customer.

Q. DOES FULL TILT HAVE ADEQUATE ACCESS TO THE CAPITAL NECESSARY TO PROVIDE SERVICE IN TENNESSEE?

A. Yes, Full Tilt possesses the financial qualifications required of applicants for licenses. Full Tilt, through its parent company Vero Fiber Networks LLC, has access to the financing necessary to fulfill any obligations it may undertake with respect to the operation and maintenance of the services specified in the Application. **Confidential Exhibit F** contains pro forma financials for Full Tilt's parent company which demonstrates that it has adequate capital available to provide the proposed service in Tennessee. Because Full Tilt and its parent are privately held companies and their financial statements are not public information, I am requesting confidential treatment of this exhibit.

Q. IF AUTHORIZED TO PROVIDE LOCAL TELECOMMUNICATIONS SERVICES, WILL FULL TILT ABIDE BY THE RULES, STATUTES, REGULATIONS, POLICIES, AND ORDERS OF THE COMMISSION, AND THE LAWS OF TENNESSEE, IN ITS PROVISION OF SERVICES, INCLUDING

THOSE FOR DISCONNECTION AND RECONNECTION OF SERVICE?

A. Yes.

Q. DOES FULL TILT PLAN TO OFFER LOCAL EXCHANGE TELECOMMUNICATIONS SERVICES IN AREAS SERVED BY AN INCUMBENT LOCAL EXCHANGE CARRIER WITH FEWER THAN 100,000 TOTAL ACCESS LINES?

A. Full Tilt intends to offer services in the entire state of Tennessee.

Q. PLEASE DESCRIBE THE PUBLIC INTEREST BENEFITS ASSOCIATED WITH FULL TILT'S PROPOSED OFFERING OF LOCAL SERVICES IN TENNESSEE.

A. Granting this Application will promote the public interest by increasing competition in the provision of telecommunications and video services in Tennessee. By enhancing competition, Full Tilt will bring significant benefits to telecommunications users within Tennessee by providing: (a) lower-priced and better-quality service; (b) innovative telecommunications services; (c) efficient use of existing communications resources; and (d) increased diversification and reliability in the supply of communications services. Full Tilt's proposed intrastate services are designed to meet the telecommunications needs of subscribers and permit customers to realize cost savings in communications services. Accordingly, Full Tilt anticipates that its proposed service will provide its customers with better quality services and will increase consumer choice through innovative, diversified, and reliable service and equipment offerings. Full Tilt will comply with all rules and orders of the Commission. Applicant will promptly provide any other information requested by the Commission.

Q. WILL FULL TILT'S PRICING METHODS BENEFIT THE PUBLIC INTEREST?

A. Yes. Full Tilt will implement competitive pricing plans.

Q. HAS ANY STATE EVER DENIED OR REVOKED THE CERTIFICATION OF FULL TILT OR ONE OF ITS AFFILIATES?

A. No.

Q. HAS FULL TILT OR ONE OF ITS AFFILIATES EVER BEEN INVESTIGATED OR SANCTIONED BY ANY REGULATORY AUTHORITY FOR SERVICE OR BILLING IRREGULARITIES?

A. No.

Q. WHO IS KNOWLEDGEABLE ABOUT VERO FIBER'S OPERATIONS AND WILL SERVE AS FULL TILT'S REGULATORY AND CUSTOMER SERVICE CONTACT?

A. I am knowledgeable about its operations and will serve as Full Tilt's regulatory and customer service contact.

Q. PLEASE EXPLAIN IN DETAIL FULL TILT'S PROPOSED PROCEDURES FOR RESPONDING TO INFORMATION REQUESTS FROM THE TRA AND ITS STAFF.

A. All requests should be routed to me, Greg Friedman, Chief Financial Officer via email or telephone.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

(signature and notary on following page)



Friedman docs.pdf

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E-Signature Summary

E-Signature 1: Gregory Alan Friedman (GF)

April 15, 2020 13:28:40 -8:00 [B9A65EAD0EF0] [10.0.0.5]
gfriedman@veronetworks.com (Principal)

E-Signature Notary: Stephanie covington (Sgc)

April 15, 2020 13:28:40 -8:00 [65B94137B462] [10.0.0.5]
sgcovington@bradley.com
I, Stephanie covington, did witness the participants named above electronically sign this document.



I swear that the foregoing testimony is true and correct to the best of my knowledge.

Gregory Alan Friedman

Signed on 2020/04/15 13:28:40 -8:00

Gregory Friedman
Chief Financial Officer
Full Tilt Communications, LLC

Respectfully submitted this 15th day of April, 2020.

State of Tennessee

County of Davidson

Subscribed and sworn to me a, Notary Public

(Title of person authorized to administer oath)

In the State and County above named this 15th day of April, 2020.

(Signature of person authorized to administer oath)

STEPHANIE G. COVINGTON
Tennessee Notary Public
Online Notary Public
Davidson County, State Of Tennessee
My Commission Expires Jan 08, 2024

Notary Stamp 2020/04/15 13:28:40 PST

658941378462

Stephanie covington

Signed on 2020/04/15 13:28:40

Signed on 2020/04/15 13:28:40 -8:00

