

From: [Lisa Foust](#)
To: [Ectory R. Lawless](#)
Cc: [David Foster](#); [Michelle Mairs](#)
Subject: FW: Responses to Staff Data Request in Docket 20-00055
Date: Thursday, May 7, 2020 2:50:12 PM

Tory,

Can you add this email to Docket No. 20-00055 (CLEC Application of Full Tilt Communications, LLC) as response to data request?

Thanks,
Lisa Foust
Utilities Division
TPUC

From: Walker, Henry [mailto:HWALKER@bradley.com]
Sent: Thursday, May 7, 2020 2:04 PM
To: Lisa Foust
Cc: Gregg Strumberger
Subject: [EXTERNAL] Responses to Staff Data Request in Docket 20-00055

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Lisa, here are the responses from Full Tilt to the Staff's data requests. Let me know if you have any questions. If these responses are sufficient, please feel free to place this email in the Commission's public docket file. If these responses require clarification, let me know and I will amend the responses accordingly. Thank-you for your expedited handling of this docket.

1. The application indicates the address for Full Tilt Communications, LLC is 242 Rangeline Road in Longwood, Florida 32750. Is this the Applicant's correct physical address? Our records indicate 242 Rangeline Road in Longwood, Florida is the address for Compliance Solutions, Inc., a regulatory compliance company. Please provide the actual physical address for the Applicant.

Answer: The corporate address of Full Tilt that is shown in the application is, as you noted, the address of Compliance Solutions, Inc. There is no legal relationship between Full Tilt and CSI. Full Tilt plans to use CSI as a vendor to assist Full Tilt in completing regulatory filings and used the CSI address so that all communications from the Commission would go to CSI. Full Tilt's main office is located at 260 1st Avenue South, Suite 200-85, St. Petersburg, Fla. 33701 (731-300-6441) , www.fulltiltcom.com. Communications from the Commission may be sent to either address or to both of them.

2. What is the affiliation or relationship between Full Tilt Communications, LLC and Compliance Solutions, Inc., if any?

Answer: See above.

3. What is the mailing address, direct contact telephone number and email address for Gregory Friedman?

Answer: Mr. Friedman's mailing address is the mailing address for Full Tilt as shown in response to question 1. His direct email address is gfriedman@fulltilt.com.

His direct telephone number is 303-250-9868. (The P.O. Box address for Mr. Friedman shown in the Small and Minority-Owned Telecommunications Business Participation Plan is Mr. Friedman's home address in Steamboat Springs, Colorado and should not be used for a business communication unless, for any reason, you are unable to reach him through the company's office.)

4. Does the Applicant have applications for authority to provide telecommunications service pending or approved in other states?

Answer: Not at this time.

5. The application references funding for Full Tilt Communications, LLC will be provided pursuant to the "Vero Operating Agreement." Provide a copy of this operating agreement.

Answer: The partners of Vero Fiber have committed to fund Vero which, in turn, has committed to fund Full Tilt. The pre-filed testimony of Mr. Friedman confirms Vero's commitment to fund Full Tilt. On April 30, I provided the names of the Vero partners and the total amount of their financial commitment to Vero (see below). On April 30, I also provided the confidential operating agreement of Full Tilt. The operating agreement of the parent company, Vero, which was granted a CCN by the Commission in 2018, is not available. As shown in the confidential financial exhibits filed with the application of Full tilt, Vero has more than ample resources to fund Full Tilt's operations in Tennessee.

6. The application included, as Confidential Exhibit F, financial statements for its corporate parent. Please clarify why the amount of funding indicated to have been committed to date by investors is not reflected in the financial statements provided.

Answer: The names of the partners of Vero Fiber Networks, which are confidential, were provided on April 30. The partners contribute capital to the business periodically based on the financial needs of the company. They have committed contributions totaling up to

\$14,203,000 of their personal capital to the company. At this time, they have contributed \$8,783,496. The remaining amount of pledged capital is still committed but has not yet been contributed. In accordance with Vero's accounting practices, the company shows in its financial reports only the contributions that have actually been received as of the date of the report.

Bradley



Henry M. Walker

Partner

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