

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Accelerating Wireline Broadband)	WC Docket No. 17-84
Deployment by Removing Barriers to)	
Infrastructure Investment)	

DECLARATION OF ASHLEY KROH

1. My name is Ashley Kroh, and I am the Network Deployment and Operations Lead for the East Region at Google Fiber Inc. I have been with the company for 5 years. My responsibilities include the management of all construction related activities, including the deployment of aerial and underground infrastructure, as well as the ongoing maintenance and operation of the network in the East Region.

2. This declaration is intended to support the Comments filed by Google Fiber in the Commission's proceeding in WC Docket No. 17-84, with respect to the Notice of Proposed Rulemaking issued by the Commission on April 21, 2017. I am familiar with the facts described in Google Fiber's Comments.

3. In the markets in which Google Fiber has begun deployment, make-ready construction on poles with existing attachments that must be moved to accommodate Google Fiber's new attachments often takes around 120 days, though in some markets, it takes even longer.

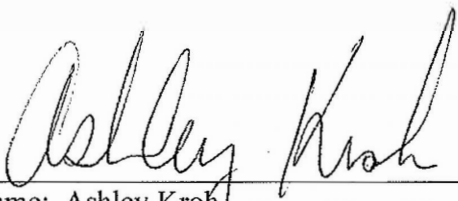
4. For instance, in some cases, existing attachers have stated that their interval for make-ready engineering and make-ready construction on their attachments is 245 days from submission to completion. Where an attacher with such long intervals must perform make-ready construction first on a given pole, this delays all subsequent work.

5. When Google Fiber began its Atlanta deployment, it submitted its first pole attachment applications in June 2015. Make-ready construction for those attachments was not completed until nearly 11 months later, in April of 2016.

6. Make-ready costs vary widely from city to city and attacher to attacher, and in unpredictable ways. For instance, in Atlanta, Google Fiber has paid up to \$1,125 for make-ready work on a single attachment on one pole. In Raleigh, Google Fiber has paid between \$540 and \$972 per attachment, depending on the existing attacher. These prices appear to have no rational basis that Google Fiber can determine, and in many cases, the same existing attacher charges vastly different prices for different sets of poles, with no plausible explanation for the variance.

7. Google Fiber has also found it difficult to identify ways in which it can reduce make-ready costs because the invoices it receives do not contain any indication of how much work is complete, the complexity of the work done, or the location of poles that have been fully made ready. This also prevents Google Fiber from determining what work it is being charged for and what work remains to be done.

I declare the foregoing to be true and correct, under penalty of perjury.


Name: Ashley Kroh

Executed on June 14, 2017