



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET
HARRISBURG, PENNSYLVANIA 17120
January 24, 2025

Docket No.
P-2024-3045567

Utility Code:
9926819

Danielle Perry
Chief Compliance Officer
Truconnect Communications, Inc.
1149 South Hill Street, Suite H-400
Los Angeles, CA 90015

RE: TruConnect Communications, Inc. (Company) Petition for Designation as an Eligible Telecommunications Carrier (Petition)

Dear Ms. Perry:

In order for us to complete our necessary analysis of the above-referenced filing, the Law Bureau requires verified answers to the enclosed data requests. An early and expeditious conclusion of your request is dependent upon full and responsive answers to the enclosed data requests. **Please provide your responses no later than ten (10) business days from the date of this letter.**

All responses to these data requests shall be submitted by eFile or mailed to:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor
Harrisburg, PA 17120

In addition, please email a copy of your responses to Erin Tate at etate@pa.gov.

Your answers must be verified per 52 Pa. Code § 1.36. Accordingly, provide the following statement with your responses:

I, [print name of company representative], hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

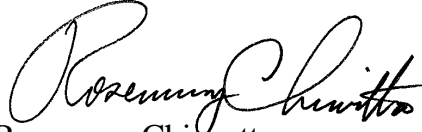
Signature _____

Title _____

Any materials deemed to be confidential in nature should be marked “CONFIDENTIAL” in bold or highlighted manner. Please contact the Erin Tate if any problems should arise that prevent a full response within ten (10) business days or if any clarification of these data requests is needed.

Questions regarding this matter may be directed to Erin Tate, Law Bureau at (717) 787-5000 or etate@pa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Rosemary Chiavetta". The signature is written in a cursive, flowing style.

Rosemary Chiavetta
Secretary

cc: Office of Consumer Advocate
Office of Small Business Advocate
Bureau of Investigation and Enforcement

Enclosure

Enclosure

**Pa. P.U.C. Bureau of Consumer Services
Data Requests – Set I
TruConnect Communications, Inc. (Company)
Docket No. P-2024-3045567**

Note: Restate each inquiry prior to providing a response. Also, include the name and title of the person providing the response.

- I-1. Assuming the Petition is granted, explain how the Company intends to operate alongside Sage Telecom Communications, LLC d/b/a TruConnect in the Pennsylvania Lifeline marketplace.
- I-2. Assuming the Petition is granted, will Sage Telecom Communications, LLC d/b/a TruConnect continue to market Lifeline services in Pennsylvania under the TruConnect brand to new customers?
- I-3. Assuming the Petition is granted, will Sage Telecom Communications, LLC d/b/a TruConnect begin to provide and/or market Lifeline services in Pennsylvania under a new brand?
- I-4. Assuming the Petition is granted, will Sage Telecom Communications, LLC d/b/a TruConnect continue to provide Lifeline services in Pennsylvania under the TruConnect brand to its existing customers or will there be any change in the services and/or equipment offered by Sage Telecom d/b/a TruConnect?
- I-5. Assuming the Petition is granted, how will the Company explain to existing and prospective customers the relative roles played by the Company and Sage Telecom Communications, LLC d/b/a TruConnect in the provision of Lifeline services?
- I-6. Explain the extent to which Sage Telecom Communications, LLC d/b/a TruConnect and the Company share the same:
 - (a) ownership
 - (b) management
 - (c) operations
 - (d) marketing
 - (e) handling of complaints
 - (f) underlying network(s)
 - (g) coverage area
 - (h) Lifeline subscriber eligibility verification policies, practices and procedures