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February 7, 2025

Via Electronic Filing

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

RE: TruConnect Communications, Inc., Docket No. P-2024-3045567

Dear Ms. Chiavetta:

Enclosed for filing, please find TruConnect Communications, Inc.'s responses to the Data Requests issued by the Pennsylvania Public Utility Commission's Bureau of Consumer Services Staff.

If you have any questions regarding this submission, please contact the undersigned.

Respectfully submitted,

A handwritten signature in black ink that reads 'Debra McGuire Mercer'.

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Counsel for TruConnect Communications, Inc.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

TruConnect Communications, Inc.

Petition for Designation as an Eligible
Telecommunications Carrier

Docket No. P-2024-3045567

**TRUCONNECT COMMUNICATIONS, INC.'S RESPONSE TO
BUREAU OF CONSUMER SERVICES STAFF DATA REQUESTS**

TruConnect Communications, Inc. (“TruConnect”) provides the following responses to the Data Requests issued by the Pennsylvania Public Utility Commission’s Bureau of Consumer Services Staff. All responses are provided by Danielle Perry, TruConnect’s Chief Compliance Officer.

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.

Response

As noted in the Eligible Telecommunications Carrier (“ETC”) petition, Sage Telecom Communications, LLC (“Sage Telecom”) and TruConnect are both owned by TSC Acquisition Corporation (“TSC”). Sage Telecom and TruConnect each have a Lifeline compliance plan approved by the Federal Communications Commission (“FCC”) which enables each company to seek designation as an ETC in states, such as Pennsylvania, that have authority to designate wireless carriers as ETCs. Sage Telecom and TruConnect initially sought ETC designations in different states. As a result, each company has had different ETC designation footprints. To date, both Sage Telecom and TruConnect have used the “TruConnect” brand to market their Lifeline service offers.

The pending TruConnect ETC petition is part of a broader multi-state effort to establish as broad as possible ETC designation footprint for TruConnect. Once the Commission designates TruConnect as an ETC, all new Pennsylvania Lifeline enrollments will be TruConnect subscribers assigned to TruConnect's Study Area Code ("SAC") At the completion of the broader multi-state effort, TSC will work in coordination with the FCC to determine a reasonable plan to transition the Sage Telecom subscribers from the Sage Telecom SAC to the TruConnect SAC. TSC will determine at a later date how it will utilize the Sage Telecom ETC designation.

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?

Response

When TruConnect is designated as an ETC in Pennsylvania, Sage Telecom will continue to offer Lifeline services under the TruConnect name, but this situation will be temporary. As explained in the response to I-1, at the completion of the broader multi-state effort (*i.e.*, when TruConnect has been designated as an ETC in the states for which is it seeking designation), TSC will work in coordination with the FCC to determine a reasonable plan to transition Sage Telecom's Lifeline subscribers from the Sage Telecom SAC to the TruConnect SAC. Prior to that transition, Sage Telecom's Lifeline subscribers will continue to receive service in the same manner that they currently receive Lifeline service.

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?

Response

Once TruConnect's ETC designation expansion process has been completed, TSC intends for the existing Lifeline business to utilize the TruConnect ETC designations and the TruConnect brand, while the Sage ETC designations would be used to support a distinct Lifeline brand with differentiated service offerings for consumers. Because the "prepaid" wireless marketplace is dynamic, TSC cannot settle on a brand and market strategy for Sage Telecom until the multi-state project to expand TruConnect's ETC footprint has been completed.

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?

Response

As stated in the response to I-2, TSC will work in coordination with the FCC to determine a reasonable plan to transition the Sage Telecom subscribers from the Sage Telecom SAC to the TruConnect SAC after completion of the broader multi-state effort to expand TruConnect's ETC footprint. Prior to that transition, Sage Telecom's Lifeline subscribers will continue to receive service in the same manner that they currently receive Lifeline service.

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?

Response

When TruConnect is designated as an ETC in Pennsylvania, Sage Telecom's Lifeline subscribers will continue to receive service in the same manner that they currently receive Lifeline service. Given that both companies offer the same service plan at this time, current Sage Telecom customers would have no reason to consider switching their Lifeline service to TruConnect and no need to distinguish TruConnect from Sage Telecom.

Potential customers primarily would be enrolled in Lifeline service via TruConnect after TruConnect is designated as an ETC. However, having two ETCs using the same brand name is temporary. When the multi-state project to expand TruConnect's ETC footprint has been completed, Sage Telecom ETC designations in Pennsylvania and elsewhere will be used to develop and support a new Lifeline brand with differentiated service offerings and marketing strategies that will provide low-income consumers with more competitive choices. At that time, Sage Telecom will notify customers of all relevant changes to their Lifeline service. Furthermore, at the time when Sage Telecom's new Lifeline brand is launched, all customers who enrolled with TruConnect will not be subject to any changes in that they will continue to receive service from TruConnect. For these reasons, neither current nor potential customers will need to distinguish TruConnect from Sage Telecom or require an explanation about the relative roles of each company.

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

Response

Sage Telecom and TruConnect share the same ownership and management. However, the companies operate separately and maintain distinct corporate and customer records to ensure compliance with relevant federal and state reporting and regulatory requirements. Sage Telecom and TruConnect rely on the same underlying carriers to provide service to their customers. The companies follow the same procedures to handle complaints and have implemented the same Lifeline subscriber eligibility verification policies, practices and procedures. Regarding marketing and service areas, as noted above, prior to TruConnect commencing its multi-state effort to expand its ETC footprint, each company focused on different states. Therefore, each company's marketing efforts related to its distinct service areas. To the extent that there is any overlap in marketing and service areas during the transition period described in these responses, it will be temporary.

I, Danielle Perry, 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).

Signed by:
Signature: 
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Title: Chief Compliance Officer

CERTIFICATE OF SERVICE

I, Olivia Fergerstrom, hereby certify that on this 7th day of February, 2025, a copy of the foregoing Response to Bureau of Consumer Services Staff's Data Requests, was served by electronic mail upon the following:

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/s/ Olivia Fergerstrom
Olivia Fergerstrom