



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

Docket No.
P-2024-3045567

Utility Code:
9926819

May 20, 2025

Marielle Montecillo
Nelson Mullins Riley & Scarborough LLP
1000 Westlakes Drive, Suite 275
Berwyn, PA 19312
(610) 943-5359
marielle.montecillo@nelsonmullins.com

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

Dear Ms. Montecillo:

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:

Matthew L. Homsher, 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 cursive script that reads "Matthew L. Homsher".

Matthew L. Homsher
Secretary

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

Enclosure

Pa. P.U.C. Law Bureau
Data Requests – Set II
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.

- III-1. Please provide the principal street address and ownership of TSC Acquisition Corporation.
- III-2. Please confirm that the Commission may construe TruConnect's Petition for ETC designation as including a petition by Sage Telecom Communications, LLC d/b/a TruConnect (Sage) to modify its existing ETC designation in the Commonwealth of Pennsylvania, such that once TruConnect receives final Commission approval of its ETC designation as set forth in the Petition, Sage's ETC designation will be limited to servicing its existing Lifeline customer base.
- III-3. Please confirm that the Company will participate in the web data exchange with BCS, in order to efficiently transmit informal complaints filed by consumers and any reporting or documentation required to resolve those complaints.
- III-4. Please confirm that no party to the Petition is subject to denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.