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June 4, 2025

**Via Electronic Filing**

Rosemary Chiavetta  
Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> 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 supplemental 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 SUPPLEMENTAL RESPONSE TO  
BUREAU OF CONSUMER SERVICES STAFF DATA REQUESTS**

TruConnect Communications, Inc. (“TruConnect”) provides the following supplemental responses to the Data Requests issued by the Pennsylvania Public Utility Commission’s Bureau of Consumer Services Staff. In particular, TruConnect provides a response to Data Request II-1(a) and a supplemental response to Data Request II-4. All responses are provided by Danielle Perry, TruConnect’s Chief Compliance Officer.

**II-1. Reference the Company’s response to Set I Data Requests, No. I-3: “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 Telecom Communications, LLC d/b/a TruConnect ETC designations would be used to support a distinct Lifeline brand with differentiated service offerings for consumers.”**

- (a) **Does TSC or Sage have any concrete plan and/or timeline whereby Sage will initiate offering Lifeline service that are differentiated from those which Sage currently provides and/or those which the Company will provide in Pennsylvania?**

**Response**

- (a) At this time, TSC Acquisition Corporation (“TSC”) and Sage Telecom Communications, LLC (“Sage Telecom”) do not have a concrete timeline whereby Sage Telecom will initiate offering Lifeline service that is differentiated from TruConnect’s Lifeline service. TruConnect clarifies that it is also possible that TSC could enter into an agreement with a third party for Sage Telecom to be acquired or to materially change its

ownership. As explained in the response to Data Request I-1, TruConnect's ETC petition is part of a multi-state effort to establish as broad as possible ETC footprint for TruConnect. While TSC does not have a concrete timeline to initiate offering Lifeline service that is differentiated from TruConnect's Lifeline service or to pursue new or materially different ownership for Sage Telecom, there are only three pending ETC petitions that need to be granted to complete the plan to expand its ETC footprint. Those petitions include the one pending with the Commission, as well as petitions pending with the Idaho Public Utilities Commission and the Kansas Corporation Commission. TSC also will need to coordinate with the Federal Communications Commission ("FCC") to determine a reasonable plan to transition the Sage Telecom subscribers from the Sage Telecom Study Area Code ("SAC") to the TruConnect SAC.

**II-4. Please provide copies of any finding or order issued over the past three (3) years by the FCC, USAC, or the relevant state authority having oversight of ETCs in any state in which TruConnect or Sage operates, alleging that TruConnect, Sage or any corporate affiliate thereof, violated any provision of federal or state law applicable to ETCs.**

**Response**

TruConnect's initially responded that this Data Request was not applicable because it has not received a finding or order alleging that TruConnect, Sage Telecom or any corporate affiliate had violated a federal or state law applicable to ETCs. Commission Staff advised counsel for TruConnect that they were aware that Sage Telecom had filed a request for review with the FCC's Wireline Competition Bureau ("Bureau") of a Universal Service Administrative Company ("USAC") determination notice and requested that TruConnect disclose any pending appeals.

USAC's determination notices are not considered to be final findings or orders regarding a company's compliance with Lifeline rules. Moreover, Sage Telecom has appealed USAC's

determination notices regarding the one Lifeline benefit per household rules. Therefore, TruConnect maintains its position that USAC's determination notices are not responsive to this data request.

Without waiving its position, TruConnect provides the following information regarding Sage Telecom's appeals (TruConnect does not have pending appeals of USAC determination notices regarding Lifeline service):

- On January 10, 2025 and March 6, 2025, Sage Telecom filed appeals with the Bureau regarding USAC determination notices asserting that Sage Telecom allegedly violated the Lifeline program's one benefit per household rule by enrolling Lifeline applicants whose addresses could not reasonably accommodate the number of subscribers enrolled at those addresses. Sage Telecom argued that there was no violation because USAC's National Verifier and the National Lifeline Accountability Database are responsible for detecting any Lifeline applications relying on the same address as other households and resolving address duplicates by following the FCC's household worksheet process. Sage Telecom also argued that USAC does not have the authority to create and apply a cap limiting the number of Lifeline households that can reside at a single address.
- On April 22, 2025, Sage Telecom filed an appeal with the Bureau regarding a USAC determination notice asserting Sage Telecom allegedly violated the FCC's Lifeline rules by failing to verify the income eligibility affidavits of certain Lifeline subscribers. Sage Telecom argued that there was not violation regarding certain subscribers who certified their Lifeline eligibility through their participation in other public assistance programs (e.g., Medicaid, SNAP, Supplemental Security Income). Sage Telecom also argued that while USAC alleged that the notary signatures and seals on the low-income affidavits at

issue “appeared to have been photocopied,” the relevant state law permits such notarizations.

*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: Danielle Perry  
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Title: Chief Compliance Officer

## CERTIFICATE OF SERVICE

I, Debra McGuire Mercer, hereby certify that on this 4<sup>th</sup> day of June, 2025, a copy of the foregoing Supplemental Response to Bureau of Consumer Services Staff Data Requests, was served by electronic mail upon the following:

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/s/ Debra McGuire Mercer  
Debra McGuire Mercer