

June 4, 2025

Via Electronic Filing and Overnight Delivery

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 please find TruConnect Communications, Inc.'s ("TruConnect") Response to Bureau of Consumer Services Staff Data Requests ("Response") issued in the above-referenced docket. The first enclosed copy of the Response contains confidential information protected as an exemption to public disclosure under Section 708(b) of the Right-to-Know Law (65 P.S. § 67.708(b)(11) (a record that reveals confidential proprietary information is exempt from public access), is not for public inspection, and is marked as such. *See* 52 Pa. Code § 1.32(b)(4). The second copy of the Response has been redacted to remove the confidential information. This redacted version was also filed using the Commission's eFiling system.

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

Respectfully submitted,



Debra McGuire Mercer
Nelson Mullins Riley & Scarborough LLP
101 Constitution Avenue, NW
Suite 900
Washington, DC 20001
(202) 689-689-2949
debra.mercer@nelsonmullins.com

June 4, 2025

Page 2

Marielle Montecillo
Nelson Mullins Riley & Scarborough LLP
1000 Westlakes Drive
Suite 275
Berwyn, PA 19312
(610) 943-5359
marielle.montecillo@nelsonmullins.com
Pennsylvania Bar No. 328935

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.

III-1. Please provide the principal street address and ownership of TSC Acquisition Corporation

Response

TSC Acquisition Corporation's principal address is 1149 South Hill Street, Los Angeles, CA 90015. [CONFIDENTIAL].

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.

Response

This data request asks TruConnect to confirm that after its designation as an ETC, Sage Telecom will only serve its existing customer base. TruConnect recently met with the FCC about transitioning Sage Telecom's subscribers to TruConnect (after TruConnect is designated in

the states where it has pending petitions). The FCC reminded TruConnect that Sage Telecom, as an ETC, has an obligation to advertise its services under 47 U.S.C. § 214(e)(1)(B) and 47 C.F.R. § 54.201(d)(2). Therefore, TruConnect is not able to confirm that Sage Telecom will only serve its existing customer base, in the event that any advertising leads to new subscribers.

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.

Response

TruConnect confirms that the Company will participate in the web data exchange with BCS.

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.

Response

TruConnect confirms 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.

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
9A546B19BB174C5...

Title: Chief Compliance Officer

CERTIFICATE OF SERVICE

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

Christopher F. Van de Verg
Law Bureau
Pennsylvania Public Utility Commission
400 North St., 3rd Floor
Harrisburg, PA 17120
cvandeverg@pa.gov

Erin Tate
Law Bureau
Pennsylvania Public Utility Commission
400 North St., 3rd Floor
Harrisburg, PA 17120
etate@pa.gov

/s/ Debra McGuire Mercer
Debra McGuire Mercer