

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
Harrisburg, PA 17105-3265**

Public Meeting held September 11, 2025

Commissioners Present:

Stephen M. DeFrank, Chairman
Kimberly Barrow, Vice Chair
Kathryn L. Zerfuss
John F. Coleman, Jr.
Ralph V. Yanora

TruConnect Communications, Inc.
Petition for Designation as an
Eligible Telecommunications Carrier

P-2024-3045567

ORDER

BY THE COMMISSION:

Before the Pennsylvania Public Utility Commission (Commission) is the Petition of TruConnect Communications, Inc. (TruConnect or Company) for Designation as an Eligible Telecommunications Carrier (Petition) throughout the Commonwealth of Pennsylvania for the limited purpose of providing Lifeline-only service to qualified low-income consumers, pursuant to Section 214(e)(2) of the Communications Act of 1934 (the Act), as amended.¹ Accordingly, TruConnect's Petition is a Lifeline-only eligible telecommunications carrier (ETC) petition. Designation as a Lifeline-only ETC would permit TruConnect to participate in the Federal Universal Service Fund (FUSF) Lifeline program and offer the Lifeline discount to eligible low-income consumers.

The Commission has reviewed the Petition and relevant supplements to determine whether it meets the statutory criteria and applicable minimum standards necessary under state and federal law, Federal Communications Commission (FCC) regulations and

¹ TruConnect seeks approval only for Lifeline service as a prepaid wireless carrier and does not seek approval for High Cost funding.

orders and other relevant federal and Pennsylvania laws, regulations and orders, to obtain Lifeline-only ETC designation in the Commonwealth of Pennsylvania. The Commission determines that TruConnect has not satisfied all relevant statutory criteria necessary to obtain a Lifeline-only ETC designation throughout its designated service area within the Commonwealth. TruConnect's Petition is hereby denied under the applicable federal statutory criteria and other relevant federal and Pennsylvania laws as set forth in this Opinion and Order.

BACKGROUND

A. FCC And State ETC Orders

The FCC established the minimum requirements necessary for a telecommunications carrier to be designated an ETC by its 1997 *Universal Service Order*,² which allows carriers designated as ETCs to receive federal universal service support from the FUSF. In 2005, pursuant to Section 214(e)(6) of the Communications Act of 1934 (Act),³ the FCC addressed these minimum requirements and adopted additional mandatory requirements for ETC designation proceedings⁴ as well as encouraged states that exercise jurisdiction over ETC designations pursuant to Section 214 (e)(2) of the Act to adopt these same requirements when deciding whether they should designate a telecommunications carrier as an ETC.⁵

Accordingly, in order to provide consistent standards and to obtain the information necessary for reviewing future petitions for ETC designation and annual ETC recertifications, the Commission adopted the FCC's statutorily prescribed requirements for ETC designations and set forth additional Pennsylvania-specific standards as

² See *Federal-State Joint Board on Universal Service*, Report and Order, 12 FCC Rcd 8776, 8847-76, ¶¶ 130-180 (1997) (*Universal Service Order*).

³ 47 U.S.C. § 214(e)(6).

⁴ See *Federal-State Joint Board on Universal Service*, Report and Order, 20 FCC Rcd 6371, 6372, 6380, ¶¶ 2, 20 (2005) (*2005 ETC Designation Order*).

⁵ See *2005 ETC Designation Order*, 20 FCC Rcd at 6372, 6380, ¶¶ 1, 20.

guidelines for all ETC applicants over which it exercises jurisdiction.⁶ The Commission codified these guidelines at 52 Pa. Code § 69.2501 (relating to standards applicable for designation and annual certification as an eligible telecommunications carrier for purposes of obtaining Federal universal service support) (*ETC Guidelines*).

B. FCC Efforts To Modernize The Federal Lifeline Program

To continue the mission of assisting qualifying low-income Americans to stay connected in today's technological climate as well as relieving some of the burden on the entities providing this service, the FCC restructured the Lifeline program. Beginning with the *2012 Lifeline Reform Order*, the FCC comprehensively reformed and modernized the Lifeline program by improving enrollment and consumer disclosures and eliminating the previous system of tiered support and setting an interim funding rate of \$9.25 per month per eligible subscriber or household.⁷

These reforms were adopted by the FCC to strengthen protections against waste, fraud, and abuse in the federal Lifeline program by, among other things: setting a savings target; improved program administration and accountability by creating a National Lifeline Accountability Database (NLAD) to prevent multiple carriers from receiving support for the same household; and confirming a one-per-household rule applicable to all consumers and Lifeline providers in the program.⁸ The FCC also took preliminary steps to modernize the federal Lifeline program by, among other things, allowing Lifeline support for bundled service plans combining voice and broadband or packages including optional calling features.⁹ The FCC has issued three subsequent Lifeline reform orders

⁶ *Final Policy Statement on Commonwealth of Pennsylvania Guidelines for Designation and Annual Recertification as an Eligible Telecommunications Carrier (ETC) for Purposes of Federal Universal Service Support*, Docket No. M-2010-2164741 (Order entered August 2, 2010) (*ETC Guidelines Order*).

⁷ See generally, *Lifeline and Link Up Reform and Modernization, et al., Report and Order and Further Notice of Proposed Rulemaking*, 27 FCC Rcd 6656 (2012) (*2012 Lifeline Reform Order*).

⁸ *Id.* at 6690-91, ¶¶ 77-78.

⁹ *Id.*

establishing a number of additional enhancements to the federal Lifeline Program, further connecting low-income Americans to voice services and now, broadband access.¹⁰

These modified requirements have been codified in the FCC’s rules and regulations, 47 C.F.R. Chapter I, Part 54, Subpart E (Universal Service Support for Low-Income Consumers). The Commission has adopted these applicable federal standards set forth in the FCC’s *Lifeline Reform Orders* for the provisioning of Lifeline service in the Commonwealth of Pennsylvania.¹¹

C. TruConnect’s ETC Petition And Data Responses

TruConnect filed the Petition on January 18, 2024. By its Petition, TruConnect “seeks ETC designation solely to provide Lifeline service to qualifying Pennsylvania consumers” and “will not (and is not eligible) to seek access to funds” for the FCC’s Link-Up or High-Cost programs.¹² According to the Petition, TruConnect “provides prepaid wireless telecommunications services to consumers by using the underlying wireless networks of facilities-based providers, T-Mobile USA, Inc. (“TMobile”) and Verizon Wireless (“Verizon”) (collectively, “Underlying Carriers”) on a wholesale basis to offer nationwide service.”¹³ TruConnect avers that it “meets all the statutory and regulatory requirements for designation as an ETC in the Commonwealth of Pennsylvania” and that granting the Petition “would advance the public interest because it would enable the Company to commence much needed Lifeline services to a wide array

¹⁰ See generally, *Lifeline and Link Up Reform and Modernization et al.*, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, 30 FCC Rcd. 7818 (2015) (*2015 Lifeline Reform Order*); *Lifeline and Link Up Reform and Modernization et al.*, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd. 3962, 4038, (2016) (*2016 Lifeline Reform Order*); *Lifeline and Link Up Reform and Modernization et al.*, Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry, 32 FCC Rcd. 10,475 (2017) (*2017 Lifeline Reform Order*), *vacated and remanded*, *National Lifeline Association et al. v. FCC*, 921 F.3d 1102 (D.C. Cir. 2019) (collectively, *Lifeline Reform Orders*).

¹¹ See, 52 Pa. Code § 69.2501(a).

¹² Petition at 1.

¹³ Petition at 3.

of low-income Pennsylvania residents as soon as possible.”¹⁴ TruConnect states that it is “currently designated and operating as a wireless ETC in California, New Jersey, Massachusetts, Rhode Island, Vermont, Tennessee, Virginia, and the U.S. Virgin Islands.”¹⁵

If the Petition is granted, TruConnect plans to provide “affordable wireless plans and quality customer service to consumers who are otherwise unable to afford them, or who were previously ignored by traditional carriers.”¹⁶ According to the Company, “TruConnect’s prepaid wireless services are affordable, easy to use, and attractive to low income consumers, providing them with access to emergency services and a reliable means of communication[.]”¹⁷ TruConnect states that it “offers consumers simple and affordable prepaid calling plans, easy-to-use handsets, and high-quality customer service.”¹⁸ TruConnect commits that it “will affirmatively reach out to the low-income sector of the consumer base to offer attractive and affordable communications options[.]” thereby contributing “to the expansion of mobile wireless and broadband services for low-income consumers in Pennsylvania.”¹⁹

Notice of TruConnect’s Petition was published in the *Pennsylvania Bulletin* at 54 Pa.B. 1804 on March 30, 2024. No protests or comments were filed in response to TruConnect’s Petition. On January 24, 2025, the Commission’s Bureau of Consumer Services (BCS) served TruConnect with an initial set of data requests (*Set I Data Requests*). On February 7, 2025, TruConnect filed its responses to these data requests (*Set I Data Responses*). On March 14, 2025, BCS served TruConnect with a second set of data requests (*Set II Data Requests*) and TruConnect filed its responses to these data

¹⁴ Petition at 2.

¹⁵ Petition at 3.

¹⁶ Petition at 4.

¹⁷ *Id.*

¹⁸ *Id.*

¹⁹ Petition at 5.

requests on March 28, 2025 (*Set II Data Responses*). TruConnect filed amended responses to the second set on March 28, 2025 (*Amended Set II Data Responses*). On May 20, 2025, BCS served TruConnect with a third set of data requests (*Set III Data Requests*) and TruConnect filed its responses to these data requests on June 4, 2025. (*Set III Data Responses*).

In its Petition, TruConnect states that it was formerly known as Telscape Communications, Inc., and is a Delaware corporation with a principal address at 1149 S. Hill Street, Suite H-400, Los Angeles, CA 90015.²⁰ TruConnect states that it is authorized to do business in Pennsylvania. TruConnect further states that it has an affiliate operating in Pennsylvania that is named Sage Telecom Communications, LLC d/b/a TruConnect (hereinafter referred to as “Sage d/b/a TruConnect” or “Sage”),²¹ which was designated by the Commission as a Lifeline-only ETC in Pennsylvania in 2015.²² TruConnect and Sage are wholly owned subsidiaries of TSC Acquisition Corporation (TSC), which shares a common street address with TruConnect.²³

Although the relationship and relative roles that TruConnect and Sage d/b/a TruConnect²⁴ would play in the Pennsylvania ETC marketplace were not discussed in the Petition, in its *Set I Data Responses*, the Company explained that:

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

²⁰ Petition at 3.

²¹ Petition at 3.

²² Docket No. P-2013-2395687, *Petition of Sage Telecom Communications, LLC, For Limited Designation as an Eligible Telecommunications Carrier* (Jan. 16, 2015) (Sage ETC Designation Order).

²³ Petition at 3.

²⁴ TruConnect’s affiliate, Sage d/b/a TruConnect, already offers and provides Lifeline services in Pennsylvania pursuant to the Commission’s *2015 Sage ETC Designation Order*.

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.²⁵

Following the transition, the Company averred that "TSC intends for the existing Lifeline business to utilize the TruConnect ETC designations and the TruConnect brand."²⁶

Pending transition of Sage subscribers to the TruConnect SAC, the Company further explained that "Sage Telecom's Lifeline subscribers will continue to receive service in the same manner that they currently receive Lifeline service."²⁷ Furthermore:

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.²⁸

²⁵ *Set I Data Responses* (Response to I-1).

²⁶ *Set I Data Responses* (Response to I-3).

²⁷ *Set I Data Responses* (Response to I-2).

²⁸ *Set I Data Responses* (Response to I-6).

The Company also makes certain vague and inconclusive statements about the future of Sage’s ETC designation. For example, in its *Set I Data Responses*, the Company stated that, following the transition of subscribers from Sage to TruConnect, “TSC will determine at a later date how it will utilize the Sage Telecom ETC designation”²⁹ and “the Sage ETC designations would be used to support a distinct Lifeline brand with differentiated service offerings for consumers” but “[b]ecause 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.”³⁰ In its *Set III Data Responses*, counsel represented that TSC does not “have a concrete timeline whereby Sage Telecom will initiate offering Lifeline service that is differentiated from TruConnect’s Lifeline service.”³¹

Finally, the Commission notes that the Company’s *Set III Data Responses* reflect a different account of Sage’s role in the transition that was presented in its earlier data responses. In its *Set I and II Data Responses*, the Company stated that, during the transition, “[p]otential customers primarily would be enrolled in Lifeline service via TruConnect after TruConnect is designated as an ETC.”³² Thus, in these earlier responses, the Company represented that Sage would continue to service its existing customer base, but TruConnect would serve new customers. However, in its *Set III Data Responses*, the Company averred that “TruConnect recently met with the FCC about transitioning Sage Telecom’s subscribers to TruConnect” and the FCC therein “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).” For that reason, TruConnect now states that it “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.”³³

²⁹ *Set I Data Responses* (Response to I-1).

³⁰ *Set I Data Responses* (Response to I-3).

³¹ *Set III Data Responses* (Response to II-1(a)).

³² *Set I Data Responses* (Response to I-5); *Set II Data Responses* (Response to II-2).

³³ *Set III Data Responses* (Response to III-2).

Thus, it now appears that the Company envisions that, during the transition, Sage d/b/a/ TruConnect will be adding new customers to its existing base, even as TruConnect begins adding new customers of its own.

DISCUSSION

Section 254(e) of the Act provides that “only an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive specific Federal universal service support.” 47 U.S.C. § 254(e). Section 214(e)(2) of the Act provides state commissions with the primary responsibility for performing ETC designations.³⁴ Consequently, in a given geographic area within its borders, a state may designate a carrier as a Lifeline-only ETC that is eligible to receive USF support from the Lifeline program.³⁵ Accordingly, TruConnect has petitioned the Commission seeking approval to be designated as a Lifeline-only ETC in the Commonwealth of Pennsylvania.

Lifeline-only ETC applicants must meet federal and state statutorily-prescribed requirements before this Commission will approve designation as an ETC.³⁶ Pursuant to 47 U.S.C. § 214(e)(1), a common carrier designated as an ETC must offer the services supported by the federal universal service mechanisms throughout the designated service area, either by using its own facilities or by using a combination of its own facilities and resale of another carrier’s services (including the services offered by another ETC) and must advertise these services throughout the designated service area.³⁷ A Lifeline-only

³⁴ 47 U.S.C. § 214(e)(2); *see also*, 47 C.F.R. § 54.201(a)(1) (“Only eligible telecommunications carriers designated under this subpart shall receive universal service support distributed pursuant to subparts D [universal service fund support for high-cost areas] and E [universal service support for low-end consumers] of this part. Eligible telecommunications carriers designated under this subpart for purposes of receiving support only under subpart E of this part must provide Lifeline service directly to qualifying low-income consumers.”).

³⁵ Given that TruConnect seeks support from the federal Lifeline program only and does not seek support from any federal high-cost support, ETC certification requirements for the high-cost program are not applicable to TruConnect.

³⁶ 52 Pa. Code § 69.2501(c); 47 U.S.C. § 214(e)(1); 47 C.F.R. §§ 54.201-54.202.

³⁷ 47 C.F.R. § 54.201(d)(1) and (2).

ETC applicant must also do the following: (1) certify that it will comply with the service requirements applicable to the support that it receives; (2) demonstrate how it will remain functional in emergency situations; (3) demonstrate that it will satisfy consumer protection and service quality standards; (4) demonstrate that it is financially and technically capable of providing the Lifeline service in compliance with federal regulations; (5) submit information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, including details on the number of minutes provided as part of the plan, additional charges, if any, for toll calls, and rates for each such plan and; (6) submit information describing the terms and conditions of any broadband Internet access service plans offered to Lifeline subscribers, including details on the speeds offered, data usage allotments, additional charges for particular uses, if any, and rates for each such plan.³⁸

Further, a Lifeline-only ETC must provide a detailed description of the geographic service area for which the petitioner requests to be designated as an ETC³⁹ and a certification that neither the petitioner, nor any party to the application, is subject to a denial of federal benefits pursuant to the Anti-Drug Abuse Act of 1988.⁴⁰

In addition to meeting these statutory requirements, state commissions must also perform a “public interest” review before approving an ETC designation. Section 214(e)(2) of the Act states that, “[u]pon request and consistent with the public interest, convenience, and necessity, the State commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier” for a designated service area, so long as the requesting carrier meets the requirements of Section 214(e)(1). Section

³⁸47 C.F.R. § 54.202(a)(1)(i), 54.202(a)(2)-(6).

³⁹ An ETC’s “service area” is set by the designating authority and is the geographic area within which an ETC has universal service obligations and may receive universal service support. 47 U.S.C. § 214(e)(5); 47 C.F.R. § 54.207(a).

⁴⁰ 21 U.S.C. § 862; 47 C.F.R. § 1.2002(a)-(b).

214(e)(2) further states that “[b]efore designating an additional eligible telecommunications carrier for an area served by a rural telephone company, the State commission shall find that the designation is in the public interest.”

This Commission reserves the right to review any request for an ETC designation and recertification on a case-by-case basis. ETC designation and recertification may be granted or denied after balancing the weight of the circumstances particular to each petition by determining if the petitioner’s documentation is consistent with the federal regulations governing ETC status, applicable state law and orders, and the FCC’s *Lifeline Reform Orders*. All the minimum federal requirements to obtain an ETC designation and to provide federal Lifeline service that are not expressly discussed herein, are nonetheless applicable to obtaining an ETC designation in Pennsylvania. This Commission continues to reserve the right to impose separate state-specific requirements, where necessary, for the protection of the Commonwealth’s consumers. Accordingly, it is with these considerations that we review TruConnect’s request for designation as a Lifeline-only ETC in the Commonwealth of Pennsylvania.

As noted above, TruConnect’s affiliate, Sage, received a designation from this Commission to provide ETC services in Pennsylvania in 2015. Sage is currently providing ETC services to eligible low-income customers in Pennsylvania and is using the same brand name of “TruConnect” for its Lifeline offerings. TruConnect offers no convincing or compelling reason why the Commission should grant it an ETC designation to provide substantially the same Lifeline service offerings⁴¹ to substantially the same consumers⁴² in substantially the same service territory⁴³ as its sister-affiliate company Sage already does in the Commonwealth. Indeed, granting TruConnect’s application would result in the two affiliates advertising with the exact same brand names

⁴¹ *Set I Data Response* (Response to I-5) (“both companies offer the same service plan at this time.”).

⁴² Both TruConnect and Sage offer prepaid wireless service to low-income consumers.

⁴³ *Set I Data Response* (Response to I-6) (“Sage Telecom and TruConnect rely on the same underlying carriers to provide service to their customers.”).

in Pennsylvania at the same time, which would result in potential consumer confusion and compliance reporting issues.

As one example of these consumer confusion and compliance reporting issues, the Commission finds that the continued operation of Sage⁴⁴ under the TruConnect name, with no timeline for differentiation of service⁴⁵, is inconsistent with the regulatory requirement in Section 54.405(d) of the FCC’s rules that a Lifeline provider “[d]isclose the name of the eligible telecommunications carrier on all materials describing the service.”⁴⁶ This regulation requires TruConnect to disclose its name to its customers and Sage to disclose its name to its customers. Yet, according to TruConnect, “[g]iven that both companies offer the same service plan at this time, current Sage Telecom customers would have... no need to distinguish TruConnect from Sage Telecom” and “neither current nor potential customers will need to distinguish TruConnect from Sage Telecom or require an explanation about the relative roles of each company.”⁴⁷ This disconnect between the regulation’s clear requirement and TruConnect’s apparent willingness to deviate from that requirement is troubling.

We note that the Company states that it will maintain separate accounting and reporting for TruConnect and Sage in compliance with all FCC regulations.⁴⁸ However, we also note Sage’s ongoing compliance issues, as evidenced by the USAC findings, relative to compliance with the FCC’s eligibility regulations. First, “[o]n January 10, 2025 and March 6, 2025, Sage Telecom filed appeals with the [FCC Wireline Competition] Bureau regarding USAC determination notices asserting that Sage Telecom allegedly violated the Lifeline program’s one benefit per household rule by enrolling

⁴⁴ Sage was designated as an ETC in Pennsylvania on January 16, 2015 by Commission Order at Docket No. P-2013-2395687.

⁴⁵ *Set II Data Response* (Response to II-1) and *Set III Data Response* (Response to III-2).

⁴⁶ 47 C.F.R. § 54.405(d).

⁴⁷ *Set I Data Response* (Response to I-5).

⁴⁸ *Set I Data Responses*, (Response to I-6).

Lifeline applicants whose addresses could not reasonably accommodate the number of subscribers enrolled at those addresses.”⁴⁹ Second, “[o]n 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.”⁵⁰ The Commission credits TruConnect’s assertion that Sage has appealed both USAC findings and does not agree with those findings. Nevertheless, TruConnect is requesting this Commission to grant its additional authority and USAC’s findings give this Commission pause that the Company can navigate the issues arising from operating two competing affiliates in the same market at the same time, while maintaining compliance with all applicable FCC regulations. In this regard, we note again that Sage and TruConnect share the same compliance personnel and procedures.⁵¹

Pursuant to 214(e)(2) of the Act, designation as an ETC must be in the public interest and benefit Pennsylvania consumers, especially low-income consumers eligible for Lifeline services.⁵² We acknowledge that the primary purpose of universal service is to ensure that all consumers, and especially low-income consumers, receive affordable and comparable telecommunications services; however, given that Sage already operates in Pennsylvania under the “TruConnect” brand name, and plans to continue to operate as an ETC in Pennsylvania using the “TruConnect” brand name indefinitely and with no commitment by the Company to any specific timeline for transition, the Commission is not convinced that granting TruConnect an additional ETC designation is in the public interest. As such, granting TruConnect a Lifeline-only ETC designation will not assist lower-income Pennsylvania customers in reaping the benefits in an intensely competitive wireless market as they would be receiving the exact same Lifeline offerings from two affiliated companies and the fact that TruConnect and Sage will be advertising those

⁴⁹ *Amended Set II Data Responses*, (Response to II-1(a)).

⁵⁰ *Amended Set II Data Responses*, (Response to II-1(a)).

⁵¹ *Set I Data Responses*, (Response to I-6).

⁵² 47 U.S.C. § 214(e)(2).

same Lifeline service offerings with the same brand name simultaneously will lead to consumer confusion.

Finally, the Commission notes the vague and open-ended nature of the proposed transition and the future of Sage. In a nutshell, the Company avers that if TruConnect is granted an ETC designation by the Commission, both it and its affiliate, Sage, will offer Lifeline service in Pennsylvania for an indefinite period, pending certain approvals by other states and the FCC, at the end of which, existing Sage customers will be transitioned to TruConnect and Sage may or may not offer differentiated Lifeline services in Pennsylvania under a different, unidentified brand at some unspecified time. Therefore, given the uncertainties involved with each step of this proposed series of transactions, the Commission concludes that designating TruConnect as a Lifeline-only ETC in Pennsylvania is not in the public interest because its sister-affiliate already operates as an ETC in the Commonwealth and uses the exact same brand name.

CONCLUSION

As discussed above and in consideration of TruConnect's Petition for Lifeline-only ETC designation and all relevant supplements, we determine that TruConnect does not meet all the criteria of the minimum federal standards applicable to obtaining a Lifeline-only ETC designation; **THEREFORE,**

IT IS ORDERED:

1. That the Petition of TruConnect for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Pennsylvania for the Purpose of Providing Lifeline Service to Qualifying Customers, as supplemented with the *Set I Data Responses*, *Set II Data Responses*, *Amended Set II Data Responses* and *Set III Data Responses* is denied.

2. That the Secretary shall serve a copy of this Opinion and Order on all parties, on the Office of Consumer Advocate, the Office of Small Business Advocate and the Commission's Bureau of Investigation and Enforcement.

3. That this ETC proceeding be marked closed.

BY THE COMMISSION

A handwritten signature in black ink, reading "Matthew L. Homsher". The signature is written in a cursive style with a large initial "M".

Matthew L. Homsher
Secretary

(SEAL)

ORDER ADOPTED: September 11, 2025

ORDER ENTERED: September 11, 2025