



Debra McGuire Mercer  
T: (202) 689-2949  
debra.mercer@nelsonmullins.com

NELSON MULLINS RILEY & SCARBOROUGH LLP  
ATTORNEYS AND COUNSELORS AT LAW  
101 Constitution Avenue, NW  
Suite 900  
Washington, DC 20001  
T: (202) 689-2800 F: (202) 689-2860  
[nelsonmullins.com](http://nelsonmullins.com)

September 26, 2025

**Via Electronic Filing**

Matthew Homsher  
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 Secretary Homsher:

Enclosed please find TruConnect Communications, Inc.'s ("TruConnect") Petition for Reconsideration of the September 11, 2025 Order issued in the above-referenced docket. TruConnect respectfully requests that the Pennsylvania Public Utility Commission grant reconsideration, within the meaning of Pa. R.A.P. 1701(b)(3), pending review of and consideration of the merits of the Petition, on or before October 10, 2025.

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'.

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](mailto:debra.mercer@nelsonmullins.com)

September 26, 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](mailto:marielle.montecillo@nelsonmullins.com)  
Pennsylvania Bar No. 328935

*Counsel for TruConnect Communications, Inc.*

Enclosure

cc: Office of Special Assistants (via email - [ra-OSA@pa.gov](mailto:ra-OSA@pa.gov))  
Service list

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

P-2024-3045567

**TRUCONNECT COMMUNICATIONS, INC.'S  
PETITION FOR RECONSIDERATION**

Pursuant to Section 703(f) of the Public Utility Code, 66 Pa. C.S.A. § 703(f) and 52 Pa. Code § 5.572(c), TruConnect Communications, Inc. (“TruConnect” or “Company”) respectfully requests the Pennsylvania Public Utility Commission (“Commission”) to reconsider its Order issued on September 11, 2025 in the above-captioned proceeding and grant TruConnect’s Petition for Designation as an Eligible Telecommunications Carrier (“ETC”) throughout the Commonwealth of Pennsylvania (“ETC Petition”).<sup>1</sup> Reconsideration of the Order is justified because certain considerations appear to have been overlooked and because there is new information that addresses the Commission’s concerns about designating TruConnect as an ETC. For the reasons discussed in this Petition, grant of the ETC Petition is in the public interest.

**I. BACKGROUND**

1. On January 18, 2024, TruConnect filed an ETC Petition, pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (47 U.S.C. § 214(e)(2)), seeking designation to provide Lifeline service to qualifying low-income consumers throughout the Commonwealth of Pennsylvania.

---

<sup>1</sup> TruConnect also relies on Section 703(g) of the Public Utility Code, 66 Pa. C.S.A. § 703(g) and 52 Pa. Code § 5.572(d), to the extent that the Commission deems this Petition to be a petition for rescission or amendment of the Order.

2. On January 24, 2025, the Commission’s Bureau of Consumer Services served TruConnect with Data Requests – Set I (“Set I Data Requests”). On February 11, 2025, TruConnect filed its responses to the Set I Data Requests (“Set I Data Responses”).

3. On March 14, 2025, the Commission’s Bureau of Consumer Services served TruConnect with Data Requests – Set II (“Set II Data Requests”). On March 28, 2025, TruConnect filed its responses to the Set II Data Requests (“Set II Data Responses”), and on June 4, 2025, TruConnect filed amended responses (“Amended Set II Data Responses”).

4. On April 4, 2024, Commission Staff at the Law Bureau and Bureau of Consumer Services, counsel for TruConnect, and representatives of TruConnect had a telephone conference to discuss Commission Staff’s questions regarding the relationship between TruConnect and its affiliate, Sage Telecom Communications, LLC d/b/a TruConnect (“Sage Telecom”).

5. On May 20, 2025, the Commission’s Bureau of Consumer Services served TruConnect with Data Requests – Set III (“Set III Data Requests”). On June 4, 2025, TruConnect filed its responses to the Set III Data Requests.

6. During the period of June 4, 2025, through September 8, 2025, counsel for TruConnect contacted the Law Bureau Staff several times seeking an update and advising that TruConnect was available to meet with Staff to answer any further questions. On September 8, 2025, Law Bureau Staff advised that there was no update but that TruConnect could monitor the case on the Commission’s website.

7. On September 11, 2025, at a public meeting, the Commission considered a recommendation to adopt the proposed Order. TruConnect did not receive a copy of the proposed Order nor was it publicly available. The Commission passed a motion to adopt the

proposed Order by a 5-0 vote. There was no substantive discussion about the matter at the public meeting.

8. On September 11, 2025, the Commission issued the Order denying TruConnect's ETC Petition.

9. The Commission's Order concluded that designation of TruConnect was not in the public interest because TruConnect's affiliate, Sage Telecom, already operates as an ETC in Pennsylvania and both companies would operate under the TruConnect brand name indefinitely. The Order also noted the Commission's concerns about customer confusion and compliance reporting issues with two affiliates using the same brand name.

10. TruConnect respectfully submits that the Commission should reconsider its denial of the ETC Petition because there are factual considerations that were not considered. Moreover, TruConnect is providing new information about the status of plans that should assuage the Commission's apprehension about having two affiliated companies operating in Pennsylvania under the same brand name on a temporary basis.

## **II. RECONSIDERATION LEGAL STANDARDS**

11. Sections 703(f) and (g) of the Public Utility Code establish a party's right to petition the Commission for rehearing, reconsideration, rescission, or amendment of a Commission order. Under Section 703(f), the Commission may "affirm, rescind, or modify its original order" in response to a petition for relief filed within 15 days after service of the order.<sup>2</sup>

---

<sup>2</sup> 66 Pa. C.S.A. § 703(f); *see also* 52 Pa. Code § 5.572(c) ("[p]etitions for reconsideration, rehearing, reargument, clarification, supersedeas or others shall be filed within 15 days after the Commission order involved is entered or otherwise becomes final.").

Under Section 703(g), the Commission “may, at any time, after notice and after opportunity to be heard as provided in this chapter, rescind or amend any order made by it.”<sup>3</sup>

12. The Commission has noted that “[p]etitions for relief predicated upon Sections 703(f) and 703(g) of the Code, whether brought under Section 5.572(c) of Commission Regulations as a petition for reconsideration, rehearing, reargument, clarification, supersedeas, or others within fifteen days of the service of a Commission order, or under Section 5.572(d) as a petition for rescission or amendment filed at any time following service of a Commission order, are reviewed by the Commission as matters seeking relief falling within the agency’s discretion.”<sup>4</sup>

13. The Commission’s standard for reviewing a petition for reconsideration is set forth in *Duick v. Pa. Gas & Water Co.*, 56 Pa. P.U.C. 553, 559 (1982):

A petition for reconsideration, under the provisions of 66 Pa. C.S. §703(g), may properly raise any matters designed to convince the commission that it should exercise its discretion under this code section to rescind or amend a prior order in whole or in part....What we expect to see raised in such petitions are new and novel arguments, not previously heard, or considerations which appear to have been overlooked or not addressed by the commission. Absent such matters being presented, we consider it unlikely that a party will succeed in persuading us that our initial decision on a matter or issue was either unwise or in error.

14. The Commission further stated in *Pennsylvania Public Utility Commission v. Jackson Sewer Corporation*, 2001 Pa. PUC LEXIS 44, at \*7 (2001): “Additionally, a Petition for Reconsideration is properly before the Commission where it pleads newly discovered evidence, alleges errors of law, or a change in circumstances.”

---

<sup>3</sup> 66 Pa. C.S.A. § 703(g); *see also* 52 Pa. Code § 5.572(d) (“[p]etitions for rescission or amendment may be filed at any time according to the requirements of section 703(g) of the act (relating to fixing of hearings.”).

<sup>4</sup> *Citizens Telephone Company of Kecksburg et al. v. NetGen Communications, Inc.*, Docket No. P-2024-3045797, Order and Opinion (June 5, 2025), at 7.

15. TruConnect's Petition meets the standards for reconsideration under *Duick* and *Jackson Sewer Corporation*, because it raises issues which "appear to have been overlooked or not addressed by the Commission" and advises the Commission of a "change in circumstances."

### **III. REQUEST FOR RECONSIDERATION**

#### **A. Introduction**

16. As detailed below, the Commission should reconsider its Order denying the ETC Petition because it overlooked or did not address the temporary nature of the period during which TruConnect and Sage Telecom would be operating under the same brand name in Pennsylvania if TruConnect was designated as an ETC. In addition, the progress that TruConnect has made on completing its multi-state effort to expand TruConnect's ETC footprint, as well as Sage Telecom's willingness to define its future actions, are new circumstances that warrant reconsideration.

17. In the Order, the Commission focused on whether designating TruConnect as an ETC would be in the public interest given the fact that TruConnect's affiliate, Sage Telecom, is an ETC in Pennsylvania operating under the TruConnect brand name.<sup>5</sup> The Commission did not find that TruConnect failed to meet any other requirements for ETC designation.

18. In response to Set I Data Requests, TruConnect explained:

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.

---

<sup>5</sup> See Order, at 11-14.

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.<sup>6</sup>

19. TruConnect met with FCC Staff in the Wireline Competition Bureau prior to embarking on its multi-state effort to expand TruConnect's ETC footprint to share its plan for moving Sage Telecom's Lifeline subscribers to TruConnect and ensure that this was accomplished in compliance with the FCC's rules. FCC Staff advised TruConnect to obtain ETC designations in all states where Sage Telecom was already designated as an ETC and then to re-engage with FCC Staff to coordinate the transfer of Sage Telecom's Lifeline customers to TruConnect.

20. Once TruConnect's ETC designation expansion project has been completed, TSC intends for the existing Lifeline business to utilize the TruConnect ETC designations and the TruConnect brand, while the Sage Telecom ETC designations would be used to support a distinct Lifeline brand with differentiated service offerings for consumers.<sup>7</sup> As explained below, Sage Telecom may also consider making a material change in ownership<sup>8</sup> or relinquishing its ETC status without prejudice.

21. In accordance with the FCC's guidance, in December 2023, TruConnect began filing petitions for designation as an ETC in all states where Sage Telecom was an ETC, as well

---

<sup>6</sup> Set I Data Response, Response to I-1.

<sup>7</sup> Set I Data Response, Response to I-3.

<sup>8</sup> Amended Set II Data Responses, Response to II-1(a).

as in additional states where Sage Telecom is not an ETC to expand its ETC footprint throughout the United States as much as possible.

22. The Order states on page 5 that TruConnect is operating as an ETC in California, New Jersey, Massachusetts, Rhode Island, Vermont, Tennessee, Virginia and the U.S. Virgin Islands. Sage Telecom is not designated as an ETC in those jurisdictions. Since commencing its ETC expansion project, TruConnect has obtained ETC designations in an additional seven states where Sage Telecom is not an ETC (Alaska, Alabama, Florida, Montana, North Dakota, South Dakota and Wyoming) and in 28 states where Sage Telecom is designated ETC.<sup>9</sup>

23. TruConnect notes that the Idaho Public Utilities Commission (“PUC”) Staff raised similar concerns about designation of TruConnect as an ETC because Sage Telecom is an ETC in the State of Idaho. TruConnect worked with Idaho PUC Staff to develop a certification to address Staff’s concerns about two affiliates offering Lifeline service under the same brand name in Idaho. In the certification, Sage Telecom agrees to comply with certain conditions upon the Idaho PUC’s grant of TruConnect’s ETC Application. The conditions ensure that Sage Telecom and TruConnect’s concurrent use of the TruConnect brand name for their Lifeline services will be a temporary situation. Sage Telecom’s representations in the certification address Idaho PUC Staff’s concerns while providing Sage Telecom sufficient time to develop new branding or materially change its ownership. A copy of TruConnect’s Notice of Filing Certification, which attaches the certification from Sage Telecom, is provided as Exhibit 1.

---

<sup>9</sup> The states where TruConnect and Sage Telecom are both designated as ETCs are: Arizona, Arkansas, Colorado, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maryland, Michigan, Minnesota, Mississippi, Missouri, Nebraska, Nevada, New York, Ohio, Oklahoma, South Carolina, Utah, Washington, West Virginia, Wisconsin, and Puerto Rico.

24. Sage Telecom is willing to sign a certification to be filed in this matter like the one filed with the Idaho PUC. TruConnect urges the Commission to accept such a certification as a means to resolve its concerns about designating TruConnect as an ETC.

25. Pennsylvania is the only jurisdiction for which Sage Telecom is designated as an ETC but TruConnect is not.<sup>10</sup> Therefore, TruConnect's designation as an ETC is the final step needed so that the Company can return to the FCC to finalize a plan to transition Sage Telecom's Lifeline subscribers to TruConnect and Sage Telecom can take actions to support a distinct Lifeline brand with differentiated service offerings, seek additional investment resulting in differentiated ownership, or relinquish its ETC designation without prejudice.

**B. The Commission Overlooked or Failed to Consider Facts that Justify Reconsideration of the Order.**

26. The Order states that granting TruConnect's ETC petition would result in two affiliates with the same brand names operating in Pennsylvania which would result in potential customer confusion and compliance reporting issues.<sup>11</sup>

27. The Commission's concern about customer confusion does not consider the fact that Sage Telecom's current Lifeline customers have been receiving service under the TruConnect brand name. As TruConnect stated in response to data requests, Sage Telecom's customers are highly familiar with the TruConnect brand name and any change to that brand name would cause confusion to current customers who enrolled in Lifeline with Sage Telecom

---

<sup>10</sup> Sage Telecom is also an ETC in Texas. However, The Texas PUC designated Sage Telecom as an ETC at a time when the Texas PUC had authority to designate wireless resellers as ETCs. Under current Texas law, wireless resellers seeking designation as an ETC must file a petition with the FCC.

<sup>11</sup> See Order, at 11-12.

d/b/a TruConnect.<sup>12</sup> Sage Telecom has marketed its Lifeline services as TruConnect for thirteen years, and all materials describing its services use that name in compliance with Section 54.405(d) of the FCC’s rules. If TruConnect is designated as an ETC in Pennsylvania, Sage Telecom’s Lifeline subscribers would 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.<sup>13</sup> Moreover, any new customers enrolled by TruConnect would understand that they are receiving service from TruConnect.

28. The Order’s statements about potential customer confusion focus on Sage Telecom’s continued operation under the TruConnect name “with no timeline for differentiation of service.”<sup>14</sup> This conclusion about the lack of a timeline overlooks the temporary nature of Sage Telecom and TruConnect both offering Lifeline services under the same brand name. As TruConnect explained in its response to data requests, the plan to transition Sage Telecom’s Lifeline service subscribers to TruConnect is contingent on TruConnect obtaining ETC designations in all states where Sage Telecom is designated as an ETC. Once that is completed, TSC, TruConnect, and Sage Telecom will work in coordination with the FCC to determine a reasonable plan to accomplish the transfer of subscribers.<sup>15</sup> While the companies will confer with the FCC regarding the process of transferring Sage Telecom’s Lifeline subscribers to TruConnect, FCC approval is not required.

---

<sup>12</sup> See Set II Data Response, Response to II-3.

<sup>13</sup> See Set I Data Response, Response to I-5.

<sup>14</sup> Order, at 12.

<sup>15</sup> See Set I Data Response, Responses to I-1 and I-2.

29. With the exception of Pennsylvania, TruConnect has obtained ETC designations from all states where Sage Telecom is an ETC, and the Company is ready to re-engage with the FCC to transfer Sage Telecom's Lifeline subscribers to TruConnect. In addition, TSC is prepared to assess and determine its plans for Sage Telecom. Thus, the timeline for differentiating Sage Telecom's and TruConnect's Lifeline services is not indefinite. Moreover, Sage Telecom is willing to submit a certification agreeing to a specific timeline for taking an action that would end Sage Telecom's use of TruConnect as a brand name.

30. The Commission's concern with compliance reporting issues also fails to consider the fact that Sage Telecom and TruConnect have been operating as affiliated Lifeline service providers for over thirteen years. During that time period, the companies have operated separately and maintained distinct corporate and customer records to ensure compliance with relevant federal and state reporting and regulatory requirements.<sup>16</sup> Sage Telecom and TruConnect are able to rely on their extensive experience in maintaining separate corporate records in the 28 states where they have been concurrently operating during the past year.

31. The Commission also refers to three findings in Universal Service Administrative Company ("USAC") determination notices regarding Sage Telecom as compliance matters that "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."<sup>17</sup> The Commission acknowledges that Sage Telecom has appealed USAC's findings (which related to Lifeline eligibility rules) and that Sage Telecom disputes the findings.<sup>18</sup> However, the Commission overlooks that USAC's

---

<sup>16</sup> See Set I Data Response, Response to I-6.

<sup>17</sup> Order, at 13.

<sup>18</sup> *Id.*

findings are not final determinations of violations by Sage Telecom nor do they indicate that Sage Telecom has a compliance issue.<sup>19</sup> The Commission also fails to consider that Sage Telecom and TruConnect have been handling Lifeline compliance across over 40 states for more than ten years. The Order contains no basis for concluding that having affiliated companies operating in the same state will impact either company's ability to maintain compliance with Lifeline rules.

**C. New Circumstances Support Reconsideration of the Order.**

32. As stated above, the Commission raises a concern that granting the ETC Petition would enable Sage Telecom and TruConnect to offer Lifeline service under the same brand name in Pennsylvania for an indefinite period.<sup>20</sup> The Commission also characterizes the proposed transfer of Sage Telecom's Lifeline subscribers to TruConnect and Sage Telecom's future actions as "vague and open-ended."<sup>21</sup> However, there are new circumstances that warrant reconsideration of the Order.

33. First, the time period during which Sage Telecom and TruConnect would offer Lifeline services under the same brand name has become more defined. TruConnect previously explained in a June 4, 2025 response to data requests, that there was not a "concrete timeline" for

---

<sup>19</sup> Two of the USAC appeals relate to USAC determination notices asserting that Sage Telecom allegedly violated the Lifeline program's one benefit per household rule. In the appeals, Sage Telecom argued, in part, 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. The third appeal relates to 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 the affidavits provided complied with relevant state law. *See* Amended Set II Data Responses, Response to II-4. The appeals remain pending.

<sup>20</sup> *See id.* at 13-14.

<sup>21</sup> *Id.* at 14.

Sage Telecom to initiate Lifeline service that is differentiated from TruConnect’s Lifeline service or to pursue new or materially different ownership for Sage Telecom. The lack of a concrete timeline was due to the fact that, at the time of the response, there were three pending ETC petitions (including one before this Commission) that needed to be granted to complete the plan to expand TruConnect’s ETC footprint.<sup>22</sup> Since June 4, 2025, two of the pending ETC petitions were granted. Therefore, the ETC Petition before this Commission is the final petition that needs to be granted. Upon grant of the ETC Petition, TruConnect will promptly confer with the FCC about the transfer of Sage Telecom’s Lifeline subscribers to TruConnect.

34. Second, Sage Telecom will commit to future actions within a defined timeline consistent with its representations in a certification filed with the Idaho PUC. Upon grant of the ETC Petition, Sage Telecom will work with the FCC on a process to transfer its current Lifeline customers to TruConnect. In addition, within one year of the effective date of an order designating TruConnect as an ETC, Sage Telecom will do one of the following:

- a. offer Lifeline service to eligible low-income Idaho consumers under a brand name other than “TruConnect” and that includes at least one plan that differs from the standard Lifeline plan offered by TruConnect;
- b. enter into an agreement with a third party to be acquired or to materially change ownership; or
- c. relinquish Sage Telecom’s ETC status without prejudice.

Sage Telecom is also willing to informally advise the Staff via email on a quarterly basis regarding its progress in transferring customers to TruConnect and its plans for brand and Lifeline plan differentiation or for a material change in ownership. Finally, as noted above, Sage

---

<sup>22</sup> See Amended Set II Data Responses, Response to II-1(a).

Telecom is willing to file a certification in this matter memorializing the foregoing commitments.

35. The conditions detailed in paragraph 33 ensure that Sage Telecom and TruConnect's concurrent use of the TruConnect brand name for their Lifeline services will be a temporary situation. In addition, Sage Telecom's commitments address Commission Staff's concerns about Sage Telecom having a vague plan while providing Sage Telecom sufficient time to develop new branding or materially change its ownership.

#### **IV. CONCLUSION**

36. Based on the foregoing discussion of facts that were overlooked or not considered and on new circumstances, TruConnect submits that the public interest would be served by reconsideration of the Commission's denial of the ETC Petition. TruConnect respectfully requests that the Commission grant this Petition for reconsideration of its Order and issue an order that grants TruConnect's ETC Petition.

37. TruConnect respectfully requests that the Commission grant reconsideration, within the meaning of Pa. R.A.P Rule 1701(b)(3), pending review of and consideration of the merits of the Petition, on or before October 10, 2025.

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](mailto:debra.mercer@nelsonmullins.com)

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

*Counsel for TruConnect Communications, Inc.*

September 26, 2025

# **Exhibit 1**

**BEFORE THE  
IDAHO PUBLIC UTILITIES COMMISSION**

TruConnect Communications, Inc.	)	
	)	Docket No. TCC-T-24-01
Application for Designation as an	)	
Eligible Telecommunications Carrier	)	
_____	)	

**NOTICE OF FILING CERTIFICATION**

TruConnect Communications, Inc. (“TruConnect” or the “Company”), hereby files the attached certification from Sage Telecom Communications, LLC (“Sage Telecom”) in support of the Company’s Application for Designation as an Eligible Telecommunications Carrier in the State of Idaho (“ETC Application”). TruConnect is a subsidiary of TSC Acquisition Corporation (“TSC”), a company that also owns Sage Telecom. In 2019, the Idaho Public Utilities Commission (“Commission”) designated Sage Telecom as an ETC.<sup>1</sup> To date, both Sage Telecom and TruConnect have used the “TruConnect” brand to market their Lifeline service offers.

The certification from Sage Telecom is being filed to address Commission Staff’s concerns about two affiliates offering Lifeline service under the same brand name in Idaho. In the certification, Sage Telecom agrees to comply with certain conditions upon the Commission’s grant of TruConnect’s ETC Application. The conditions ensure that Sage Telecom and TruConnect’s concurrent use of the TruConnect brand name for their Lifeline services will be a temporary situation. As explained in the Supplement to the ETC Application, filed on July 9, 2024, the pending TruConnect ETC Application is part of a broader multi-state effort to establish

---

<sup>1</sup> See *In the Matter of the Application of Sage Telecom Communications, LLC for Designation as an Eligible Telecommunications Carrier*, Case No. SAG-T-19-01, Order No. 34314 (April 17, 2019).

a broad ETC designation footprint for TruConnect. Once that ETC designation expansion process has been completed for TruConnect, 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 and potentially additional investment resulting in differentiated ownership. TruConnect submits that Sage Telecom's representations set forth in the certification address Commission Staff's concerns while providing Sage Telecom sufficient time to develop new branding or materially change its ownership.

For the reasons stated in the ETC Application, as supplemented by the Company's filings in this matter, TruConnect respectfully requests that the Commission promptly designate TruConnect as an ETC in the State of Idaho for the purpose of participating in the Lifeline program.

Respectfully submitted,



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

*Counsel for TruConnect Communications, Inc.*

May 30, 2025


## CERTIFICATION

Danielle Perry, on behalf of Sage Telecom Communications, LLC (“Sage Telecom”) states as follows:

1. I am the Chief Compliance Officer of Sage Telecom. In my capacity as Chief Compliance Officer of Sage Telecom, I am an authorized officer of Sage Telecom. I am providing this Declaration in support of TruConnect Communications, Inc.’s (“TruConnect”) Application for Designation as an Eligible Telecommunications Carrier (“ETC”), filed with the Idaho Public Utilities Commission (“Commission”) in Docket No. TCC-T-24-01.
2. In 2019, the Commission designated Sage Telecom as an ETC in the State of Idaho. Sage Telecom and TruConnect are both subsidiaries of TSC Acquisition Corporation. Sage Telecom and TruConnect both use the “TruConnect” brand name to market Lifeline services.
3. Sage Telecom understands that TruConnect’s ETC Application filed with the Commission is part of a broader multi-state effort to establish a broad ETC designation footprint for TruConnect. Once that ETC designation expansion process has been completed in all states where Sage Telecom is designated as an ETC, Sage Telecom will work with the Federal Communications Commission on a process to transfer its current Lifeline customers to TruConnect. As of the date of this certification, TruConnect has ETC applications pending before three state commission that have also designated Sage Telecom as an ETC: this Commission, the Kansas Corporation Commission, and the Pennsylvania Public Utility Commission.
4. Within one year of the effective date a Commission order designating TruConnect as an ETC, Sage Telecom will do one of the following:
  - a. offer Lifeline service to eligible low-income Idaho consumers under a brand name other than “TruConnect” and that includes at least one plan that differs from the standard Lifeline plan offered by TruConnect;
  - b. enter into an agreement with a third party to be acquired or to materially change ownership; or
  - c. relinquish Sage Telecom’s ETC status without prejudice.
5. Sage Telecom will informally advise the Staff via email on a quarterly basis regarding its progress in transferring customers to TruConnect and its plans for brand and Lifeline plan differentiation or for a material change in ownership.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 5/30/2025

Signed by:  
  
50CACC631DE1442...  
Danielle Perry  
Chief Compliance Officer  
Sage Telecom Communications, LLC

## VERIFICATION

*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).*

Date: 9/25/2025

Signed by:  
  
9A546B19BB174C5...  
Danielle Perry  
Chief Compliance Officer  
TruConnect Communications, Inc.

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party), § 5.41 (relating to service of petitions) and of § 5.572 (relating to service of petitions for relief, including petitions for reconsideration). The document was served on each party via email. The document was filed electronically on the Pennsylvania Public Utility Commission eFiling system.

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

NazAarah Sabree  
Small Business Advocate  
Office of Small Business Advocate  
555 Walnut Street Forum Place, 1<sup>st</sup> Floor  
Harrisburg, PA 17101  
[ra-sba@pa.gov](mailto:ra-sba@pa.gov)

Erin Tate  
Law Bureau  
Pennsylvania Public Utility  
Commission  
400 North St., 3rd Floor  
Harrisburg, PA 17120  
[etate@pa.gov](mailto:etate@pa.gov)

Alison Kaster  
Director and Chief Prosecutor  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
400 North St., 2<sup>nd</sup> Floor  
Harrisburg, PA 17120  
[akaster@pa.gov](mailto:akaster@pa.gov)

Katherine Kennedy  
Assistant Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101  
[KKennedy@paoca.org](mailto:KKennedy@paoca.org)  
[consumer@paoca.org](mailto:consumer@paoca.org)

Dated this 26<sup>th</sup> day of September, 2025

/s/ Debra McGuire Mercer  
Debra McGuire Mercer  
*Counsel for TruConnect  
Communications, Inc.*