

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

Petition of Sage Telecom Communications,
LLC d/b/a TruConnect to Expand Its
Eligible Telecommunications Carrier
Service Area

Docket No. _____

**PETITION OF SAGE TELECOM COMMUNICATIONS, LLC
D/B/A TRUCONNECT TO EXPAND ITS ELIGIBLE
TELECOMMUNICATIONS CARRIER SERVICE AREA**

I. INTRODUCTION

Sage Telecom Communications, LLC d/b/a TruConnect (Sage or the Company), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the Act),¹ Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (FCC)² and Chapter 480-123 of the Washington Administrative Code (WAC), hereby files this petition to expand Sage’s Eligible Telecommunications Carrier (ETC) service area in the State of Washington (Petition). The Washington Utilities and Transportation Commission (Commission) designated Sage as an ETC by an Order dated May 7, 2020, in Docket No. UT-190744.³ Sage requests to expand its ETC service area to provide Lifeline service to additional qualifying Washington households. Specifically, Sage seeks to expand its ETC designated service area to include additional wire centers within the wireless network

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R. §§ 54.101-54.207.

³ *Petition of Sage Telecom Communications, LLC d/b/a TruConnect Seeking Designation as an Eligible Telecommunications Carrier in the State of Washington pursuant to 47 U.S.C. § 214(e)(2) (Low Income Only)*, Order, Docket No. UT-190744 (May 7, 2020) (ETC Designation Order).

coverage of its underlying carriers that were not included in its ETC designation. The Company does not seek access to Universal Service Fund support for the purpose of providing service to high-cost areas.

As demonstrated herein, and as certified in attached Exhibit 1, Sage continues to meet all applicable statutory and regulatory requirements for designation as an ETC.⁴ The Commission's grant of Sage's Petition would advance the public interest by enabling the Company to expand the availability of Lifeline service to substantially more low-income consumers in Washington. Accordingly, Sage respectfully requests that the Commission expeditiously approve this Petition.

All correspondence, communications, pleadings, notices, orders, and decisions relating to this Petition should be addressed to:

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⁴ See *Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket Nos. 11-42 and 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) (*2012 Lifeline Reform Order*); *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42 et al., Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016); *Bridging the Digital Divide for Low-Income Consumers, Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support*, WC Docket Nos. 17-287, 11-42, and 09-197, Order on Reconsideration, Memorandum Opinion and Order, FCC 17-155 (rel. Dec. 1, 2017); *Bridging the Digital Divide for Low-Income Consumers, Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support*, WC Docket Nos. 17-287, 11-42, and 09-197, Fifth Report and Order and Memorandum Opinion and Order and Order on Reconsideration, FCC 19-111 (rel. Nov. 14, 2019); see also WAC Chapter 480-123.

with copies to:

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II. DESIGNATED SERVICE AREA

In the ETC Designation Order, the Commission designated Sage as an ETC to provide wireless Lifeline service in the wire centers listed in Appendix B to the ETC Designation Order.⁵ At the time the Commission issued the ETC Designation Order, Sage's underlying carriers were Verizon Wireless (Verizon), Sprint Spectrum L.P. (Sprint) and T-Mobile USA, Inc. (T-Mobile).⁶ Since the date of the ETC Designation Order, the coverage area of Sage's underlying carriers has expanded. In order to best serve its customers and provide quality service and coverage throughout Washington, Sage seeks to expand its ETC service area to match its expanded service area within Washington. Sage customers will continue to benefit from its underlying carriers' ability to remain functional in emergency situations, including access to a reasonable amount of back-up power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations.

Sage seeks to revise its ETC designated service area to include additional wire centers within the wireless network coverage of its underlying carriers, including as that network

⁵ See ETC Designation Order, at 6 (granting Sage's request for designation as an ETC "limited to the list of Washington exchanges set forth in Appendix B").

⁶ In 2020, Sprint and T-Mobile merged to form T-Mobile US, Inc. By April 2022, Sage customers using the Sprint network were transitioned to T-Mobile. Service that had previously been provided on Sprint's network is now provided on T-Mobile's network.

coverage may change or expand going forward. For the Commission's reference, a list of the wire centers associated with service area that Sage seeks to add to its ETC designated service area is attached as Exhibit 2.

III. SAGE MEETS APPLICABLE REQUIREMENTS

The FCC's rules set forth the information that must be contained in an petition for ETC designation.⁷ In its initial ETC Petition, incorporated herein by reference, Sage provided all the information required by the FCC's rules in effect at the time, including those set forth in the *2012 Lifeline Reform Order*. The Commission found in its ETC Designation Order that Sage met the requirements for designation as an ETC. Sage has complied with the conditions in the ETC Designation Order and will continue to do so. In accordance with 47 C.F.R. § 54.202(a)(1)(i) and as certified to in the attached verification, Sage will comply with the service requirements applicable to the support that it receives. Sage provides the following additional information to address FCC rules governing the Lifeline program that were amended after the Company's ETC Designation Order was issued.

A. Sage Will Continue to Provide All Supported Services

Sage will continue to provide all supported services required by Section 54.101(a) of the FCC's Rules⁸ throughout its requested service area in the State of Washington, including voice telephone service and broadband Internet access service. Sage commits that its Lifeline-supported services will continue to meet or exceed the minimum service standards set forth in 47 C.F.R. § 54.408, including as they change going forward. The Company's current Lifeline

⁷ See 47 C.F.R. §§ 54.101 - 54.207.

⁸ 47 C.F.R. § 54.101(a).

offering is attached as Exhibit 3, and its Terms and Conditions are available on its website.⁹

Sage currently offers these Lifeline wireless plans throughout its existing service area in Washington.

B. Sage's Processes Comply with the Lifeline Verification and Enrollment Requirements, and the Company Remains Committed to Preventing Waste, Fraud and Abuse of the Lifeline Program

Section 54.410 of the FCC's rules requires ETCs to certify and verify a Lifeline customer's initial and continued eligibility. Sage has processes in place to facilitate compliance with federal customer enrollment requirements. Specifically, the Company relies on the National Verifier and the National Lifeline Accountability Database (NLAD), each of which is administered by the Universal Service Administrative Company (USAC), to determine an applicant's eligibility for Lifeline service (except in Texas, where the Company follows specific state requirements). Every applicant is required to complete the standardized Lifeline application in the National Verifier environment, which covers the necessary information collection, disclosures, and certifications required by Section 54.410(d) of the Lifeline rules.¹⁰ For applicants verified as being eligible by USAC's National Verifier and NLAD, Sage completes enrollment by transmitting the required information into NLAD as required by Section 54.404(b)(6) of the FCC's rules. Sage also: (1) informs customers of the need to use the service at least once every thirty (30) days as required by Section 54.407(c)(2); (2) provides notice to customers after 30 days of non-usage that they must use the service within 15 days or their service will be terminated as required by Section 54.405(e)(3); and (3) requires customers to activate their Lifeline service as required by Section 54.407(c)(1). Sage does not provide a

⁹ See <https://www.truconnect.com/terms-and-conditions>.

¹⁰ 47 C.F.R. § 54.410(d).

customer with a handset (if the customer qualifies for a free handset) or otherwise activate Lifeline service until the applicant completes the application in the National Verifier and receives eligibility approval.¹¹

Sage has additional processes in place to guard against waste, fraud, and abuse, and to ensure compliance with FCC rules designed to achieve that objective, including customer usage, cure period, and de-enrollment requirements set forth in Sections 54.407(c)(2) and 54.405(e)(3), general notice and de-enrollment requirements set forth in Section 54.405(e)(1), transmission of information to NLAD and recordkeeping requirements set forth in Sections 54.404(b)(6) and 54.417, annual certification and reporting requirements set forth in Sections 54.416 and 54.420, and reimbursement claims processes established by USAC consistent with Sections 54.403 and 54.407(a). Sage also complies with Sections 54.410(f) of the FCC's rules governing annual subscriber re-certification of eligibility and coordinates with USAC's National Verifier and NLAD systems to manage additional de-enrollments related to USAC-administered benefit transfers and failure to re-certify.¹² If Sage receives a request for de-enrollment from a subscriber, it processes the request within two (2) business days in accordance with Section 54.405(e)(5).

Sage has direct contact with all applicants for its Lifeline service, either in person through its employees, agents, or representatives, or via SMS messaging, the telephone, mail, or online. In addition, in accordance with Section 54.406 of the FCC's rules, Sage's enrollment representatives are required to register in USAC's Representative Accountability Database.

¹¹ 47 C.F.R. § 54.410(a).

¹² 47 C.F.R. §§ 54.405(e), 54.410(f).

Finally, Sage provides or requires Lifeline-specific training for all personnel, whether employees, direct contractors, or representatives, who interact with new or prospective customers regarding the FCC's Lifeline eligibility and certification rules and the Company's practices and policies designed to implement those rules. Sage has a zero-tolerance policy for waste, fraud, and abuse, and personnel are instructed to notify the Company's compliance team if they suspect that anyone might be providing false information or attempting to obtain a duplicate Lifeline benefit.

IV. EXPANSION OF SAGE'S ETC SERVICE AREA WOULD PROMOTE THE PUBLIC INTEREST

In its ETC Designation Order, the Commission found that designation of Sage as an ETC would serve the public interest. Similarly, expansion of Sage's ETC service area to include all areas where its underlying carriers have coverage will serve the public interest by increasing the number of low-income households that can benefit from the Company's high quality mobile voice, text, and data services. Sage's online and in-person, real-time distribution methods, which rely upon Internet-enabled compliance checks, will enable the Company to bring Lifeline service to eligible consumers throughout its expanded service area. Moreover, Sage's Lifeline rate plans allow feature-rich mobile connectivity for qualifying subscribers at low cost to subscribers without the burden of credit checks or contracts.

The Commission's grant of Sage's request to expand its designated service area also would promote competition and increase customer choice for low-income households residing in the expanded service area. Indeed, its presence as a competitor will lead to additional competition within the Lifeline market, especially throughout its expanded service area, that should help improve the rate of program participation by eligible subscribers. For the foregoing reasons, grant of this Petition is in the public interest.

V. CONCLUSION

Based on the foregoing, Sage respectfully requests that the Commission promptly grant this Petition and expand Sage's Lifeline-only ETC service area to include all wire centers within the wireless network coverage of its underlying carriers.

Respectfully submitted,



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*Counsel for Sage Telecom Communications, LLC
d/b/a TruConnect*


September 26, 2023

Exhibit 1

VERIFICATION

I, Nathan Johnson, Co-Chief Executive Officer of Sage Telecom Communications, LLC d/b/a TruConnect (Sage) am authorized to sign this verification on behalf of Sage. I have reviewed the facts set forth in the foregoing petition and verify that facts relating to Sage 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 any hearing held in this matter. I further certify that Sage will comply with the service requirements applicable to the low-income universal service support it receives.

Date: 9/25/2023

DocuSigned by:

Nathan Johnson

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Exhibit 2

EXHIBIT 2

Sage Telecom Communications, LLC d/b/a TruConnect

OCN Name	EXCHANGE	CLLI
ASOTIN TELEPHONE CO.	ANATONE	ASOTIN TEL CO
WASHINGTON RSA NO. 8 LIMITED PARTNERSHIP	GOLDENDALE	WASH RSA NO. 8 LTD
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	BREWSTER	FRONTIER COM NW - WA
QWEST CORPORATION	COULEE DAM	QWEST CORPORATION
QWEST CORPORATION	COLVILLE	QWEST CORPORATION
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	CURLEW	FRONTIER COMM NW-WA
PEND OREILLE TELEPHONE COMPANY	CUSICK	PEND OREILLE TEL CO
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	DALLESFORT	CENTURYLINK - WA
EASTERN SUB-RSA LIMITED PARTNERSHIP	DAVENPORT	EASTERN SUB-RSA LTD
ELLENSBURG TELEPHONE CO.	VANTAGE	ELLENSBURG TEL CO
QWEST CORPORATION	ELK-GRNBLF	QWEST CORPORATION
PIONEER TELEPHONE CO.	ENDICOTT	PIONEER TEL CO
COMCAST PHONE OF WASHINGTON/OREGON, LLC - WA	SILVERLAKE	COMCAST PHONE WA/OR
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - WA	QUINCY	VERIZON WIRELESS-WA
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	GRANDVIEW	CENTURYLINK - WA
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	GRAYHARBCO	FRONTIER COMM NW-WA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	LKQUINAULT	CENTURYLINK
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	HUNTERS	CENTURYLINK
PEND OREILLE TELEPHONE COMPANY	IONE	PEND OREILLE TEL CO
INTEGRA TELECOM OF WASHINGTON, INC. - WA	RICHMNDNBCH	INTEGRA TELECOM - WA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	KAHLOTUS	CENTURYLINK
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	KLICKITAT	CENTURYLINK - WA
LEVEL 3 COMMUNICATIONS, LLC - WA	REPUBLIC	LEVEL 3 COMM - WA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	KETTLE FLS	CENTURYLINK
PIONEER TELEPHONE CO.	LACROSSE	PIONEER TEL CO
UNITED STATES CELLULAR CORP. - WASHINGTON	LONG BEACH	UNITED STATES CEL WA
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	LOOMIS	FRONTIER COMM NW-WA
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	LYLE	CENTURYLINK - WA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	MESA	CENTURYLINK
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MOLSON	FRONTIER COMM NW-WA
NEW CINGULAR WIRELESS PCS, LLC	NESPELEM	NEW CINGULAR WIRLESS
NEW CINGULAR WIRELESS PCS, LLC	OMAK	NEW CINGULAR WIRLESS
NEW CINGULAR WIRELESS PCS, LLC	OROVILLE	NEW CINGULAR WIRLESS
NEW CINGULAR WIRELESS PCS, LLC	WILBUR	NEW CINGULAR WIRLESS

OCN Name	EXCHANGE	CLLI
PEND OREILLE TELEPHONE COMPANY	METALINFLS	PEND OREILLE TEL CO
WESTERN WAHAKIYAKUM COUNTY TELEPHONE CO.	NASELLE	W WAHAKIYAKUM CNTY TEL
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	NILE	FRONTIER COMM NW-WA
QWEST CORPORATION	NORTHPORT	QWEST CORPORATION
QWEST CORPORATION	COPALIS	QWEST CORPORATION
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	OCOSTA	CENTURYLINK
SKYLINE TELECOM COMPANY - WA	MT HULL	SKYLINE TELECO CO-WA
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	PATERSON	CENTURYLINK - WA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	PACIFICBCH	CENTURYLINK
WHIDBEY TELEPHONE CO.	PT ROBERTS	WHIDBEY TEL CO
INLAND TELEPHONE CO.	PRESCOTT	INLAND TEL CO
LEVEL 3 COMMUNICATIONS, LLC - WA	WH SALMON	LEVEL 3 COMM - WA
CENTURYTEL OF COWICHE, INC. DBA CENTURYLINK	RIMROCK	CENTURYLINK
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	ROOSEVELT	CENTURYLINK - WA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	SNOQUMPASS	CENTURYLINK
360NETWORKS (USA) INC. - WA	STARBUCK	360NTWS (USA) - WA
360NETWORKS (USA) INC. - WA	TONASKET	360NTWS (USA) - WA
360NETWORKS (USA) INC. - WA	WASHTUCNA	360NTWS (USA) - WA
360NETWORKS (USA) INC. - WA	WINTHROP	360NTWS (USA) - WA
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	STEVESPASS	FRONTIER COM NW - WA
HAT ISLAND TELEPHONE CO.	HAT ISLAND	HAT ISLAND TEL CO
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	TROUT LAKE	CENTURYLINK - WA
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	WHITSTRAN	CENTURYLINK - WA
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	WILLARD	CENTURYLINK - WA
LEWIS RIVER TELEPHONE COMPANY, INC.	YALE	LEWIS RIVER TEL CO

Exhibit 3

WASHINGTON LIFELINE OFFERING

LIFELINE PLANS	VOICE	TEXT (SMS)	DATA High Speed	Free International Calling	Lifeline Price
Lifeline Only	Unlimited	Unlimited	4.5 GB	Canada, Mexico, China, Vietnam, South Korea	\$0.00

“TOP-UPS”	Price
International Top Up (55 Countries)	\$5
500 MB High Speed Data	\$5
1 GB High Speed Data	\$10
3 GB	\$20
8 GB	\$30

All packages include:

- Free calls to TruConnect Customer Service
- Free calls to 611 services
- Free calls to 911 emergency services
- Free access to Voicemail, Caller-ID, and Call Waiting features
- Voice minutes may be used for Domestic Long Distance at no extra cost
- Free SIM Card