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April 10, 2020

VIA ELECTRONIC DELIVERY

Mark L. Johnson, Executive Director
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr., SW
Olympia, WA 98504

Re: Sage Telecom Communications, LLC dba TruConnect (Docket UT-190744)
Further Supplemental Information re: Petition for Designation as an ETC

Dear Mr. Johnson:

By this letter, Sage Telecom Communications, LLC dba TruConnect (“TruConnect”) further supplements its pending Petition for Designation as an Eligible Telecommunications Carrier (“ETC”) (“ETC Petition”).

Attached hereto as Exhibit A, TruConnect provides coverage information showing the ILEC exchanges included in its proposed ETC service area. This Exhibit A correlates with the zip code coverage information provided in Exhibit 4 of TruConnect’s ETC Petition. An updated certification page is also attached. By letter filed in this docket on December 23, 2019, TruConnect updated its proposed Lifeline offering to reflect compliance with changes in the Federal Communications Commission’s (“FCC”) minimum service standards. TruConnect has thus provided all of the information required to demonstrate TruConnect meets the requirements for ETC designation, and that such designation will serve the public interest.

It has never been more important than now to remove barriers and open up all Americans’ access to communications and healthcare. As the Commission responds to the ever-changing national challenges presented by the COVID-19 pandemic, it is of utmost importance that we, as a society, ensure that the most vulnerable Americans are well served as they prepare for and respond to the COVID-19 virus conditions. Millions of low-income Americans do not have access to affordable telecommunications services necessary to contact healthcare providers and access safe telemedicine services, obtain essential services, or survive in an online-only work and school environment—and many of these are eligible for telecommunications services through the Lifeline program. At this critical time, it is vital that TruConnect have the ability to offer Lifeline in Washington in order to provide telemedicine solutions, enroll more eligible subscribers, and meet the life-threatening needs of many Washingtonians.

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TruConnect respectfully requests that the Commission act at the earliest possible time to designate TruConnect as an ETC. Introducing TruConnect into the market as an additional wireless ETC provider in Washington will help to close the widening gap for wireless and broadband services and quicken the ability to ensure Lifeline-eligible consumers have the safety net they need during this national emergency.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me at 770-232-9200 or info@telecomcounsel.com. Thank you.

Respectfully submitted,

s/ Heather Kirby

Heather Kirby
Regulatory Specialist
Lance J.M. Steinhart, P.C.

Attachments

Certification

STATE OF CALIFORNIA)
)
COUNTY OF LOS ANGELES)

I, Nathan Johnson, the Co-CEO (Co-Chief Executive Officer) of Sage Telecom Communications, LLC d/b/a TruConnect (“Company”), certify under penalty of perjury under the laws of the State of Washington that the statements made in the Company’s Petition for Designation as an Eligible Telecommunications Carrier and supplements thereto are true and correct to the best of my knowledge and belief.



Nathan Johnson, Co-CEO

EXHIBIT A

Coverage Area by ILEC Exchange

ILEC	EXCHANGE	CLLI
ASOTIN TELEPHONE CO.	ASOTIN	ASOTWAXA
CENTURYTEL OF COWICHE, INC. DBA CENTURYLINK	COWICHE	CWCHWAXX
CENTURYTEL OF COWICHE, INC. DBA CENTURYLINK	TIETON	TITNWAXX
CENTURYTEL OF INTER-ISLAND, INC. DBA CENTURYLINK	SAN JUAN	BLKIWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	ALMIRA	ALMRWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	AMES LAKE	ASLKWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	ASHFORD	ASFDWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	BASIN CITY	BSCTWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CARNATION	CRNTWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CATHLAMET	CTHLWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CHENEY	CHNYWAXC
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CHEWELAH	CHWLWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CONNELL	BSCTWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	COULEECITY	CLCYWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CRESTON	CETNWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CURTIS	CRTSWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	EDWALLTYLR	EDWLWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	ELMA	ELMAWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	ELTOPIA	ELTPWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	EUREKA	EURKWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	FALL CITY	FLCYWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	FORKS	CLBYWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	FOX ISLAND	ARLTWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	GIG HARBOR	GGHRWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	HARRINGTON	HRTNWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	KINGSTON	KGTNWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	LIND	LINDWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	MATHEWSCOR	ELTPWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	MEDICAL LK	MDLKWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	MONTESANO	MNTSWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	MORTON	MRTNWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	NORTH BEND	NBNDWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	ODESSA	ODSSWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	ORTING	ORNGWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	REARDAN	RRDNWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	RITZVILLE	RTVLWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	SO PRAIRIE	SPRRWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	SOUTH BEND	RYMNBWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	SPANGLE	SPNGWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	SPRAGUE	SPRGWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	TWISP	TWISWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	VADER	VADRWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	VASHON	VSHNWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	WILSON CRK	WSCKWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	YACOLT	YCLTWAXA
ELLENSBURG TELEPHONE CO.	ELLENSBURG	ELBGWAXA

ILEC	EXCHANGE	CLLI
ELLENSBURG TELEPHONE CO.	KITTITAS	ELBGWAXA
ELLENSBURG TELEPHONE CO.	SELAH	ELBGWAXA
ELLENSBURG TELEPHONE CO.	THORP	ELBGWAXA
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	BENTONCITY	BNCYWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	BOTHELL	BOTHWAXB
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	BRIDGEPORT	BRPTWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	CAMAS	CAMSWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	DOUGLASCO	MNFDWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	EVERETT	EVRTWAXA
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	FARMINGTON	FRTNWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	GARFIELD	GRFDWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	GEORGE	GERGWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	HALLS LAKE	HLLKWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	KENNEWICK	KNWCWAXA
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	KIRKLAND	BOTHWAXB
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MARYSVILLE	ARTNWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MT VERNON	ALGRWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	NACHES	NCHSWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	NEWPORT	NWPTWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	OAK HARBOR	CPVLWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	OAKESDALE	OKDLWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	PALOUSE	PALSWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	PULLMAN	PLMNWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	RICHLAND	RCLDWAXA
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	ROCKFORD	FRFDWAXA
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	ROSALIA	MLDNWAXA
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	SKYKOMISH	SKYKWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	SNOHOMISH	CLVWWAXA
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	SOAP LAKE	SOLKWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	TEKOA	TEKOWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WENATCHEE	CHLNWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WHATCOMCTY	ACMEWAXA
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WOODLAND	WDLDWAXA
HOOD CANAL TELEPHONE CO.	UNION	UNINWAXB
INLAND TELEPHONE CO.	DEWATTO	DWTOWAXA
INLAND TELEPHONE CO.	ROSLYN	RSLNWAXX
INLAND TELEPHONE CO.	UNIONTOWN	UNTWAXA
KALAMA TELEPHONE COMPANY	KALAMA	KALMWAXB
LEWIS RIVER TELEPHONE COMPANY, INC.	AMBOY	AMBYWAXA
LEWIS RIVER TELEPHONE COMPANY, INC.	COUGAR	COGRWAXX
LEWIS RIVER TELEPHONE COMPANY, INC.	LA CENTER	LACTWAXA
MASHELL TELECOM, INC.	EATONVILLE	ETVLWAXC
MCDANIEL TELEPHONE CO.	MOSSYROCK	MSRKWAXX
MCDANIEL TELEPHONE CO.	SALKUM	ONLSWAXA
QWEST CORPORATION	ABERDEEN	ABRDWA01
QWEST CORPORATION	AUBURN	AUBNWA01

ILEC	EXCHANGE	CLLI
QWEST CORPORATION	BAINBDG IS	BNISWA01
QWEST CORPORATION	BATTLEGRND	BTLGWA01
QWEST CORPORATION	BELFAIR	BLFRWA01
QWEST CORPORATION	BELLEVUE	BLLVWAGL
QWEST CORPORATION	BLACKDIMND	BDMDWA01
QWEST CORPORATION	BREMERTON	BMTNWA01
QWEST CORPORATION	BUCKLEY	BCKLWA01
QWEST CORPORATION	CASTLEROCK	CSRKWA01
QWEST CORPORATION	CENTRALIA	CENLWA01
QWEST CORPORATION	CHEHALIS	CHHLWA01
QWEST CORPORATION	CLARKSTON	LSTNIDSH
QWEST CORPORATION	CLE ELUM	CLELWA01
QWEST CORPORATION	COLFAX	CLFXWA01
QWEST CORPORATION	CRYSTAL MT	CRMTWA01
QWEST CORPORATION	DAYTON	DYTNWA01
QWEST CORPORATION	DEER PARK	DRPKWA01
QWEST CORPORATION	DES MOINES	DESMWA01
QWEST CORPORATION	ELK-GRNBLF	ELK WA01
QWEST CORPORATION	ENUMCLAW	ENMCWA01
QWEST CORPORATION	EPHRATA	EPHRWA01
QWEST CORPORATION	GRAHAM	GRHMWAGR
QWEST CORPORATION	HOODSPORT	HDPTWA01
QWEST CORPORATION	ISSAQUAH	ISQHWAEX
QWEST CORPORATION	KENT	KENTWA01
QWEST CORPORATION	LIBERTY LK	LBLKWA01
QWEST CORPORATION	LONGVIEW	LGVWWA02
QWEST CORPORATION	LOON LAKE	LNLKWA01
QWEST CORPORATION	MAPLE VLY	MPVYWAMV
QWEST CORPORATION	MOSES LAKE	MSLKWA01
QWEST CORPORATION	NEWMANLAKE	NWLKWA01
QWEST CORPORATION	OLYMPIA	LACYWA01
QWEST CORPORATION	OTHELLO	OTHEWA01
QWEST CORPORATION	PASCO	PASCWA01
QWEST CORPORATION	PATEROS	PTRSWA01
QWEST CORPORATION	POMEROY	PMRYWA01
QWEST CORPORATION	PORT ORCH	COLBWA01
QWEST CORPORATION	PORTLUDLOW	PTLWWA01
QWEST CORPORATION	PTTOWNSEND	PTTWWA01
QWEST CORPORATION	PUYALLUP	PYLPWA01
QWEST CORPORATION	RENTON	KENTWAOB
QWEST CORPORATION	RIDGEFIELD	RDFDWA01
QWEST CORPORATION	ROCHESTER	ROCHWA01
QWEST CORPORATION	ROY	ROY WA01
QWEST CORPORATION	SEATTLE	KENTWAOB
QWEST CORPORATION	SHELTON	SHTNWA01
QWEST CORPORATION	SILVERDALE	SLDLWASI

ILEC	EXCHANGE	CLLI
QWEST CORPORATION	SPOKANE	SPKNWA01
QWEST CORPORATION	SPRINGDALE	SPDLWA01
QWEST CORPORATION	SUMNER	BYLKWA01
QWEST CORPORATION	TACOMA	TACMWAFA
QWEST CORPORATION	TACOMAWVLY	TACMWAWA
QWEST CORPORATION	TOUCHET	WLWLWA01
QWEST CORPORATION	VANCOUVER	ORCHWA01
QWEST CORPORATION	WAITSBURG	WTBGWA01
QWEST CORPORATION	WALLAWALLA	WLWLWA01
QWEST CORPORATION	WARDEN	WRDNWA01
QWEST CORPORATION	WINLOCK	WNLCWA01
QWEST CORPORATION	YAKIMA	YAKMWA02
ST JOHN TELEPHONE CO.	ST JOHN	STJHWAXA
TENINO TELEPHONE CO.	BUCODA	TENNWAXA
TENINO TELEPHONE CO.	TENINO	TENNWAXA
TOLEDO TELEPHONE CO., INC.	TOLEDO	TOLDWAXA
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	CHIMACMCTR	CNTRWAXX
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	COLUMBIA	CLMAWAXA
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	GLENWOOD	GLWDWAXA
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	GRANGER	GRNGWAXA
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	HARRAH	HRRHWAXA
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	HOOD CANAL	BRNNWAXX
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	MABTON	BCTNWAXX
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	MATTAWA	MTWAWAXA
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	POULSBO	PLSBWAXX
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	PROSSER	PRSRWAXA
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	PT ANGELES	GRNRWAXX
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	STEVENSON	STSNWAXA
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	SUNNYSIDE	SNSDWAXX
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	TOPPENISH	TPNSWAXX
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	WAPATO	WPATWAXX
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	WHITE SWAN	WHSWWAXX
WESTERN WAHAKIUM COUNTY TELEPHONE CO.	GRAYSRIVER	GRRVWAXA
WHIDBEY TELEPHONE CO.	SO WHIDBEY	SWHDWAXX
YCOM NETWORKS, INC.	RAINIER	YELMWAXA
YCOM NETWORKS, INC.	YELM	YELMWAXA