

**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. UT-230791

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

Sage Telecom Communications, LLC d/b/a TruConnect (Sage or the Company), by its undersigned counsel, files this first amendment to its petition to expand Sage's Eligible Telecommunications Carrier (ETC) service area in the State of Washington (Petition). By this amendment, Sage provides the Washington Utilities and Transportation Commission (Commission) with information regarding how it will advertise its Lifeline services in its requested expanded service area. In addition, Sage provides a revised Exhibit 2, which lists the wire centers associated with service area that Sage seeks to add to its ETC designated service area. This amendment is being filed in response to a request from Commission Staff.

**Advertising Information**

Sage will advertise the availability and rates for the Company's Lifeline services using media of general distribution as required by 47 C.F.R. § 54.201(d)(2). Sage's advertising also will comply with the requirements set forth in the Federal Communications Commission's

Lifeline Reform Order.<sup>1</sup> The Company will advertise its services in a manner reasonably designed to reach those likely to qualify for Lifeline service, using mediums for outreach such as print advertisements, direct marketing, social media and the Internet. Sage will engage in advertising campaigns specifically targeted to reach those likely to qualify for Lifeline service, promoting the availability of cost-effective wireless services to this neglected consumer segment. Sage may also promote the availability of its Lifeline offering by distributing brochures at various state and local social service agencies and may partner with nonprofit assistance organizations in order to inform customers of the availability of its Lifeline service. In addition, Sage intends to utilize its network of retail partners to help promote the availability of its Lifeline plans, especially retail outlets that are frequented by low-income consumers.

Sage will provide retail vendors with signage to be displayed where Company products are sold, and with printed materials describing the Company's Lifeline program. Sage will explain in clear, easily understood language the following disclosures in all marketing materials related to the supported service: (a) that the service is a Lifeline-supported service; (b) that only eligible consumers may enroll in the program; (c) what documentation is necessary for enrollment; and (d) that the benefit is limited to one per household consisting of either wireline or wireless service and is non-transferrable. Sage will also explain that Lifeline is a government benefit program and willfully making false statements to obtain Lifeline benefits may be punished by fine or imprisonment or result in being barred from the program. Additionally, Sage

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<sup>1</sup> See *In the Matter of 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 No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11, ¶¶ 274-277 (rel. Feb. 6, 2012) ("Lifeline Reform Order").

will disclose the company name under which it does business and the details of its Lifeline service offerings in any Lifeline-related marketing and advertising.

**Expanded Service Area Description**

Sage provides a revised Exhibit 2 that lists the wire centers associated with service area that Sage seeks to add to its ETC designated service area. Sage asks the Commission to replace Exhibit 2 provided with the Petition with the revised Exhibit 2 attached to this amendment. The revisions to Exhibit 2 include updating the names of certain wire centers and removing wire centers that are currently within Sage’s ETC service area.

**CONCLUSION**

Based on the information set forth in the Petition, as amended by the foregoing, Sage respectfully requests that the Commission promptly grant its 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*

November 7, 2023

# **Revised Exhibit 2**

**ILEC NAME**

ASOTIN TELEPHONE CO.  
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA  
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA  
PEND OREILLE TELEPHONE COMPANY  
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA  
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA  
PIONEER TELEPHONE CO.  
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA  
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA  
PEND OREILLE TELEPHONE COMPANY  
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK  
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA  
PIONEER TELEPHONE CO.  
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK  
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK  
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK  
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK  
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA  
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA  
PEND OREILLE TELEPHONE COMPANY  
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA  
SKYLINE TELECOM COMPANY - WA  
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK  
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK  
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA  
WHIDBEY TELEPHONE CO.  
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA  
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA  
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK  
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA  
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA  
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK  
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA  
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK  
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA  
QWEST CORPORATION  
QWEST CORPORATION  
United Telephone Company of The Northwest  
United Telephone Company of The Northwest  
CenturyTel of Cowiche, Inc.  
CenturyTel of Washington  
CenturyTel of Washington  
CenturyTel of Washington  
CenturyTel of Washington  
CenturyTel of Washington  
CenturyTel of Washington

**EXCHANGE**

ANATONE  
BREWSTER  
CURLEW  
CUSICK  
DALLESPORT  
DALLESPORT  
ENDICOTT  
GOLDENDALE  
GRANDVIEW  
IONE  
KETTLE FLS  
KLICKITAT  
LACROSSE  
LKQUINAULT  
LKQUINAULT  
LONG BEACH  
LONG BEACH  
LOOMIS  
LYLE  
METALINFLS  
MOLSON  
MT HULL  
NESPELEM  
PACIFICBCH  
PATERSON  
PT ROBERTS  
REPUBLIC  
ROOSEVELT  
STARBUCK  
TONASKET  
TROUT LAKE  
WASHTUCNA  
WH SALMON  
WILBUR  
WILLARD  
OMAK  
Oroville  
WH SALMON  
GOLDENDALE  
RIMROCK  
STARBUCK  
WASHTUCNA  
DAVENPORT  
NESPELEM  
WILBUR  
LONG BEACH

Frontier Communications Northwest, Inc.  
Frontier Communications Northwest, Inc.  
Frontier Communications Northwest, Inc.  
Frontier Communications Northwest, Inc.  
Frontier Communications Northwest, Inc.

TONASKET  
QUINCY  
SILVERLAKE  
RICHMNDDBCH  
REPUBLIC