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April 3, 2018

**VIA ELECTRONIC DELIVERY**

Utah Public Service Commission  
Attn: Gary Widerburg  
160 East 300 South, 4<sup>th</sup> Floor  
Salt Lake City, UT 84111

Re: Sage Telecom Communications, LLC d/b/a TruConnect - Petition for Designation  
as an Eligible Telecommunications Carrier in the State of Utah

Dear Mr. Widerburg:

Attached please find for filing Sage Telecom Communications, LLC d/b/a TruConnect's Petition for Designation as an Eligible Telecommunications Carrier in the State of Utah. A check in the amount of \$100.00 made out to the Public Service Commission of Utah will be sent via overnight mail for payment of the filing fee.

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 hkirby@telecomcounsel.com. Thank you for your attention to this matter.

Respectfully submitted,

*s/ Heather Kirby*

Heather Kirby  
Regulatory Specialist  
Lance J.M. Steinhart, P.C.  
*Attorneys for Sage Telecom Communications, LLC  
d/b/a TruConnect*

Attachments

cc: Nathan Johnson



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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Petition of Sage Telecom Communications, LLC d/b/a TruConnect	)	
	)	
	)	
for Designation as an Eligible Telecommunications Carrier in the State of Utah	)	Docket No. _____
	)	
	)	

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**PETITION OF SAGE TELECOM COMMUNICATIONS, LLC D/B/A TRUCONNECT  
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER  
IN THE STATE OF UTAH**

**I. INTRODUCTION**

Sage Telecom Communications, LLC d/b/a TruConnect (“TruConnect” or the “Company”), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”)<sup>1</sup>, Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”),<sup>2</sup> and the rules and regulations of the Public Service Commission of Utah (“Commission”), hereby submits this Petition for Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of Utah. TruConnect seeks ETC designation solely to provide Lifeline service to qualifying Utah consumers; it will not seek access to funds from the federal Universal Service Fund (“USF”) for the purpose of participating in the Link-Up program or providing service to high cost areas.<sup>3</sup> As demonstrated herein, and as certified in Exhibit 1 to this Petition, TruConnect meets all the statutory and regulatory requirements for designation as an ETC in the State of Utah, including

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<sup>1</sup> 47 U.S.C. § 214(e)(2)

<sup>2</sup> 47 C.F.R. §§ 54.101-54.207.

<sup>3</sup> The Company does not seek access to state USF in the instant petition. Given that TruConnect only seeks support from the low-income program and does not seek any high-cost support, ETC certification requirements for the high-cost program are not applicable to the Company.

the requirements outlined in the FCC's *Lifeline and Link Up Reform Order*<sup>4</sup> and *Lifeline Modernization Order*.<sup>5</sup> Rapid grant of TruConnect's request, moreover, would advance the public interest because it would enable the Company to commence much needed Lifeline service to low-income Utah residents as soon as possible. Accordingly, the Company respectfully requests that the Commission expeditiously approve this Petition for ETC designation.

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

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## **II. BACKGROUND**

### **A. Company Overview**

TruConnect is a Texas Limited Liability Company.<sup>6</sup> Its principal office is located at 1149 S. Hill Street, Suite H-400, Los Angeles, California 90015. TruConnect is a reseller of commercial mobile radio service ("CMRS") throughout the United States. Sage Telecom Communications, LLC is a subsidiary of TSC Acquisition Corporation ("TSC") and was formerly known as Sage Telecom, Inc. before a corporate restructuring in 2012. TSC also owns

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<sup>4</sup> *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 (rel. Feb. 6, 2012) ("*Lifeline and Link Up Reform Order*").

<sup>5</sup> *In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket No. 11-42, WC Docket No. 00-197, WC Docket No. 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) (hereinafter, "*Third Report and Order*" or "*Lifeline Modernization Order*").

<sup>6</sup> TruConnect was organized in the State of Texas on December 5, 2012.

TruConnect Communications, Inc., formerly Telscape Communications, Inc. TruConnect provides prepaid wireless telecommunications services to consumers by using the underlying wireless networks of Sprint Spectrum, L.P. (“Sprint”), Verizon Wireless (“Verizon”), and/or T-Mobile USA, Inc. (“T-Mobile”) (collectively, “Underlying Carriers”) on a wholesale basis to offer nationwide service. TruConnect obtains from its Underlying Carriers the network infrastructure and wireless transmission facilities to allow the Company to operate as a Mobile Virtual Network Operator (“MVNO”). TruConnect is currently designated as a wireless ETC in Arkansas, California, Colorado, Georgia, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maryland, Michigan, Minnesota, Missouri, Nebraska, Nevada, Ohio, Oklahoma, Pennsylvania, South Carolina, Texas, and West Virginia.

TruConnect’s prepaid wireless services are affordable, easy to use, and attractive to low-income and lower-volume consumers, providing them with access to emergency services and a reliable means of communication that can be used both at home and while traveling to remain in touch with friends and family and for contacting prospective employers. TruConnect offers consumers simple and affordable prepaid calling plans, a variety of prepaid service plans, easy-to-use handsets and high-quality customer service. Given its pricing and marketing strategy and the demographics of its customers in other states, TruConnect anticipates that many of its customers will be from low-income backgrounds and will not previously have enjoyed access to wireless service because of economic constraints, poor credit history, or sporadic employment. TruConnect does not conduct credit checks or require customers to enter into long-term service contracts as a prerequisite to obtaining wireless service.

By providing affordable wireless plans and quality customer service to consumers who are otherwise unable to afford them, or were previously ignored by traditional carriers, TruConnect



will expand the availability of wireless and broadband services to many more consumers, which is the principal reason that Congress created the universal service program.

**B. Proposed Lifeline Offering**

TruConnect has the ability to provide all services supported by the universal service program, as detailed in Section 54.101(a) of the FCC's Rules (47 C.F.R. § 54.101(a)) throughout Utah. TruConnect intends to be a leader in the prepaid marketplace by offering consumers exceptional value and competitive amounts of voice and/or broadband usage at all price points. The Company's Lifeline service offering will provide customers with the same features and functionalities enjoyed by all other TruConnect prepaid customers, with one notable exception: prepaid Lifeline services will not require payment of an out-of-pocket fee by subscribers, but instead, TruConnect will receive support from the Lifeline program as compensation for providing those services.

TruConnect commits that its Lifeline-supported services will meet or exceed the minimum service standards set forth in 47 C.F.R. § 54.408, including as they change going forward. Attached hereto as Exhibit 2 is a summary table of the Company's proposed Lifeline service offerings, showing that Lifeline customers can receive 750 voice minutes, unlimited text messages, and 1 gigabyte (GB) of data per month at a net cost of \$0.00 after application of Lifeline support, or choose from plan options with unlimited voice minutes and higher amounts of data for discounted rates between \$15.00 to \$35.00 per month. Customers will also be able to purchase additional minutes or data as needed.

In addition to wholly-supported or discounted wireless services, prepaid Lifeline customers will receive a free data-capable handset that meets the equipment requirements set forth in 47 C.F.R. § 54.408, as well as access to voice mail, caller I.D., call forwarding, 3-way calling, and call waiting features at no additional charge. Customers may use their minutes to

place domestic long-distance calls at no additional charge, and calls to the Company's customer service are free with no deduction of available minutes. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes. As Exhibit 2 demonstrates, the Company's Lifeline offering will not only allow feature-rich mobile connectivity for qualifying subscribers at no cost to the subscriber, but also will bring a variety of rate plans into the reach of eligible customers that are comparable in minutes and features to those available to post-paid wireless subscribers – but at low Lifeline rates and without a the burden of credit checks or service contracts. TruConnect's prepaid offering will be an attractive alternative for consumers who need the mobility, security, and convenience of a wireless phone, but who are concerned about usage charges or long-term contracts.

### **C. Plan Enrollment**

Customers interested in obtaining information on the Lifeline program will be directed to a toll-free telephone number and to the Company's website, which will contain information regarding the Company's Lifeline service plans, including a detailed description of the program and eligibility criteria. Customers may then request that an enrollment form be mailed to them, or they can begin the application process online or over the phone. The certification form, a sample of which is attached hereto as Exhibit A of Exhibit 3,<sup>7</sup> will explain in clear, easily understandable language that:

- (i) Lifeline is a federal benefit;
- (ii) Lifeline service is available for only one line per household;
- (iii) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses;
- (iv) households are not permitted to receive benefits from multiple providers;
- (v) that violation of the one-per-household requirement would constitute a violation of

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<sup>7</sup> The Company will utilize the universal Federal eligibility certification form once available, as required by FCC rules (*see* 47 C.F.R. § 54.410(d)).

the FCC's rules and would result in the consumer's de-enrollment from the program, and potentially, prosecution by the United States government; and  
(vi) a Lifeline subscriber may not transfer his or her service to any other individual, including another eligible low-income consumer.

The certification form will also require all consumers, at sign up and annually thereafter, to provide the information and certifications, under penalty of perjury, required by 47 C.F.R. § 54.410(d). See Exhibit 3, the Company's FCC-Approved Compliance Plan, for more detailed enrollment information. TruConnect will annually re-certify the continued eligibility of all of its subscribers.

#### **D. Prevention of Waste, Fraud and Abuse**

TruConnect recognizes the importance of safeguarding the USF. TruConnect complies with the requirements of the National Lifeline Accountability Database ("NLAD") and section 54.404 of the FCC's rules. As such, the Company (or Eligibility Administrator, where applicable) queries the NLAD for every enrollment to determine whether a prospective subscriber is currently receiving a Lifeline service from TruConnect or any other ETC, and whether anyone else living at the prospective subscriber's residential address is currently receiving Lifeline service. The FCC has taken steps to further curb abuse in the Lifeline program by establishing the National Lifeline Eligibility Verifier ("National Verifier"), which transfers the responsibility of eligibility determination away from Lifeline providers.<sup>8</sup> TruConnect will rely on the National Verifier, once in place, to determine initial and ongoing eligibility of Utah Lifeline subscribers.

Furthermore, consistent with federal regulations, the Company will not seek USF reimbursement for inactive subscribers and will de-enroll any subscriber that has not used the Company's Lifeline service as set forth in 47 C.F.R. § 54.407(c)(2). An account will be

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<sup>8</sup> See *Lifeline Modernization Order*, section III.C.

considered active if the authorized subscriber establishes usage, as “usage” is defined by 47 C.F.R. § 54.407(c)(2), during the specified timeframe, currently a period of thirty (30) days, or during the notice period set forth in 47 C.F.R. § 54.405(e)(3), currently a period of fifteen (15) days. In accordance with 47 C.F.R. § 54.405(e)(3), TruConnect will provide the subscriber advanced notice, using clear, easily understood language, that the subscriber’s failure to use the Lifeline service within the notice period will result in service termination for non-usage. Customers that have been deactivated may participate in the Company’s Lifeline service in the future by reapplying and re-establishing eligibility.

To further protect the integrity of the USF, TruConnect has contracted with CGM, LLC, a Georgia-based lifeline service bureau, to edit all subsidy request data. CGM will process and validate the Company’s subsidy data to prevent: (1) Duplicate Same-Month Lifeline Subsidies (Double Dip): any name/address that is already receiving a lifeline subsidy from the Company will be automatically prevented from receiving a second lifeline subsidy in that same month; and (2) Inactive lines receiving subsidy: CGM’s systems compare all subsidy requests to underlying network status to ensure that subsidies are requested only for active lines. Moreover, TruConnect has implemented an internal auditing process to review NLAD and CGM findings as a final layer of fraud prevention. Through the processes described above, TruConnect ensures that it does not over-request from support funds.

### **III. THE COMMISSION HAS JURISDICTION TO DESIGNATE WIRELESS ETCs**

Section 214(e)(2) of the Act provides state public utility commissions with the “primary responsibility” for the designation of ETCs.<sup>9</sup> Although Section 332(c)(3)(A) of the Act prohibits states from regulating the entry of or the rates charged by any provider of commercial mobile

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<sup>9</sup> 47 U.S.C. § 214(e)(2).

service or any private mobile service, this prohibition does not allow states to deny wireless carriers ETC status.<sup>10</sup> Therefore, the Commission has the authority to designate TruConnect as an ETC. Pursuant to this authority, the Commission has historically participated in determining whether to grant ETC status to an applying carrier, including any requesting wireless carrier.<sup>11</sup> Under the Act, a state public utility commission with jurisdictional authority over ETC designations must designate a common carrier as an ETC if the carrier satisfies the requirements of section 214(e)(1). TruConnect recognizes that Section 214(e)(1)(A) of the Act states that ETCs shall offer services, at least in part, over their own facilities and that Section 54.201(i) of the FCC's Rules (47 C.F.R. § 54.201(i)) prohibits state commissions from designating as an ETC a telecommunications carrier that offers services exclusively through the resale of another carrier's services. However, the FCC has granted forbearance from enforcement of this facilities requirement to carriers seeking Lifeline-only ETC designation.<sup>12</sup> Section 10(e) of the Act (47 U.S.C. § 160(e)) provides: “[a] State commission may not continue to apply or enforce any provision of this chapter that the [Federal Communications] Commission has determined to forbear from applying under subsection (a) of this section.” As such, the Commission is required by Section 10(e) to act in accordance with the FCC's grant of forbearance, and therefore, may not apply the facilities-based requirement to TruConnect. Therefore, the Commission has the authority to act under Section 214(e)(2) of the Act and to grant TruConnect's request for designation as an ETC throughout the State of Utah.

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<sup>10</sup> *USF Order*, at 8858-59, ¶ 145.

<sup>11</sup> *See In the Matter of the Petition of WWC Holding Co., Inc., for Designation as an Eligible Telecommunications Carrier*, Report and Order, Docket No. 98-2216-01 (July 21, 2000).

<sup>12</sup> *See Lifeline and Link Up Reform Order* at ¶ 368.

**A. The ETC Designation Request Is Consistent with Commission Precedent**

TruConnect's request for ETC designation to participate in the Lifeline program is consistent with the Commission's designation of Virgin Mobile as an ETC.<sup>13</sup> In its decision, the Commission determined that Virgin Mobile satisfied all of the necessary eligibility requirements and that designation of a prepaid wireless provider as an ETC would serve the public interest. TruConnect requests that the Commission expeditiously process its ETC Petition so that it can quickly commence providing qualifying low-income Utah customers with affordable USF-supported wireless services. Designation of TruConnect as an ETC would further competition for wireless Lifeline services and would offer eligible consumers an additional choice of providers for accessing telecommunications services, representing a significant step towards ensuring that all low-income consumers share in the many benefits associated with access to wireless services.

**IV. TRUCONNECT SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC**

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." Section 214(e)(2) of the Act authorizes state commissions, such as the Commission, to designate ETC status for federal universal service purposes and authorizes the Commission to designate wireless ETCs.<sup>14</sup> Section 214(e)(1) of the Act and Section 54.201(d) of the FCC's rules provide that applicants for ETC designation must be common carriers that will offer all of the services supported by universal service, either using their own facilities or a combination of their own facilities and the resale of another carrier's services, except where the FCC has

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<sup>13</sup> See *In the Matter of Virgin Mobile USA, L.P. Petition for Limited Designation as an Eligible Telecommunications Carrier*, Docket No. 10-2521-01, Report and Order (May 25, 2011).

<sup>14</sup> See *Federal-State Joint Board on Universal Service, First Report and Order*, 12 FCC Rcd 8776, 8858-59, ¶ 145 (1997) ("USF Order").

forborne from the “own facilities” requirement. Applicants also must commit to advertise the availability and rates of such services,<sup>15</sup> and provide additional information set forth in 47 C.F.R. § 54.202(a). As detailed below, TruConnect satisfies each of the above-listed requirements.

**A. TruConnect Will Provide Service Consistent with the FCC’s Grant of Forbearance from Section 214’s Facilities Requirements**

Although Section 214 requires ETCs to provide services using their facilities, at least in part, the FCC has forborne from that requirement with respect to carriers such as TruConnect. In the *Lifeline and Link Up Reform Order*, the FCC granted forbearance from the “own-facilities” requirement contained in Section 214(e)(1)(A) for carriers that are, or seek to become, Lifeline-only ETCs, subject to the following conditions:<sup>16</sup>

(1) the carrier must comply with certain 911 requirements [(a) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; (b) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services; and (c) complying with conditions (a) and (b) starting on the effective date of this Order]; and

(2) the carrier must file, and the Bureau must approve, a compliance plan providing specific information regarding the carrier’s service offerings and outlining the measures the carrier will take to implement the obligations contained in this Order as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary.”

TruConnect has availed itself of the FCC’s grant of blanket forbearance. In accordance with the *Lifeline and Link Up Reform Order*, TruConnect filed its Compliance Plan which the FCC approved on December 26, 2012.<sup>17</sup> A copy of the approved Compliance Plan is attached hereto as Exhibit 3. TruConnect commits to providing Lifeline service in Utah in accordance with the Compliance Plan and in compliance with applicable state and federal regulations, to the extent amendments thereto may supersede commitments made in the Compliance Plan.

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<sup>15</sup> See 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d)(2).

<sup>16</sup> See *Lifeline and Link Up Reform Order* at ¶¶ 368, 373 and 379.

<sup>17</sup> See FCC Public Notice DA 12-2063, [https://apps.fcc.gov/edocs\\_public/attachmatch/DA-12-2063A1\\_Rcd.pdf](https://apps.fcc.gov/edocs_public/attachmatch/DA-12-2063A1_Rcd.pdf).

## **B. TruConnect Is a Common Carrier**

CMRS providers like TruConnect are treated as common carriers.<sup>18</sup>

## **C. TruConnect Will Provide All Supported Services**

Through its wholesale arrangement with underlying carriers, TruConnect is able to provide all supported services required by FCC's Rules (47 C.F.R. § 54.101(a)), as follows:

### **1. Voice Telephony Service**

The FCC has determined that “eligible voice telephony services must provide voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and toll limitation services to qualifying low-income consumers as provided in [47 C.F.R. § 54] subpart E.”<sup>19</sup>

Voice Grade Access. TruConnect provides voice grade access to the public switched network (“PSTN”) through the purchase of wholesale CMRS services from its facilities-based underlying carriers.

Local Usage. TruConnect offers a variety of rate plans that provide its customers with minutes of use for local service at no additional charge.

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<sup>18</sup> *Implementation of Sections 3(n) and 332 of the Communications Act, Regulatory Treatment of Mobile Services*, GN Docket No. 93-252, Second Report and Order, 9 FCC Rcd 1411, 1425 ¶¶ 37, 1454-55 ¶ 102 (1994) (wireless resellers are included in the statutory “mobile services” category, and providers of cellular service are common carriers and CMRS providers); 47 U.S.C. § 332(c)(1)(A) (“mobile services” providers are common carriers); *see also PCIA Petition for Forbearance for Broadband PCS*, WT Docket No. 98-100, Memorandum Opinion and Order and Notice of Proposed Rulemaking, 13 FCC Rcd 16857, 16911 ¶¶ 111 (1998) (“We concluded [in the *Second Report and Order*] that CMRS also includes the following common carrier services: cellular service, ... all mobile telephone services and resellers of such services.”)

<sup>19</sup> *See* 47 C.F.R. § 54.101(a).



Access to Emergency Services. TruConnect provides 911 and E911 access for all of its customers to the extent the local government in its service area has implemented 911 or E911 systems. As noted, calls to 911 emergency services will always be free and will be available regardless of service activation status or availability of minutes. TruConnect also complies with the FCC's regulations governing the deployment and availability of E911 compatible handsets.

Toll Limitation. In its *Lifeline and Link Up Reform Order*, the FCC stated that toll limitation would no longer be deemed a supported service.<sup>20</sup> "ETCs are not required to offer toll limitation service to low-income consumers if the Lifeline offering provides a set amount of minutes that do not distinguish between toll and non-toll calls."<sup>21</sup> Nonetheless, TruConnect's offerings inherently allow Lifeline subscribers to control their usage, as its wireless service is offered on a prepaid, or pay-as-you-go, basis. TruConnect's service, moreover, is not offered on a distance-sensitive basis and local and domestic long distance minutes are treated the same. TruConnect will not seek reimbursement for toll limitation service.

## **2. Broadband Internet Access Service**

The FCC has stated that broadband internet access service ("BIAS") consists of the ability for a user to receive "the capability to transmit data to and receive data from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up Internet access service."<sup>22</sup> TruConnect will provide BIAS to low-income consumers via resale of its underlying carriers' mobile services.

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<sup>20</sup> See *Lifeline and Link Up Reform Order* at ¶ 367.

<sup>21</sup> See *Lifeline and Link Up Reform Order* at ¶ 49.

<sup>22</sup> See 47 C.F.R. § 8.2(a).

#### **D. TruConnect Will Advertise the Availability of Supported Services**

TruConnect will advertise the availability and rates for the services described above using media of general distribution as required by 47 C.F.R § 54.201(d)(2). TruConnect's advertising will comply with the requirements set forth in the *Lifeline and Link Up Reform Order*, as outlined in the Company's Compliance Plan.<sup>23</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.<sup>24</sup> The Company 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. TruConnect 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, TruConnect intends to utilize its network of retail partners, once established, to help promote the availability of its Lifeline plans, especially retail outlets that are frequented by low income consumers. TruConnect will provide retail vendors with signage to be displayed wherever Company products are sold, and with printed materials describing the Company's Lifeline program.

TruConnect 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. TruConnect

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<sup>23</sup> See Exhibit 3, section (4). See also *Lifeline and Link Up Reform Order* at Section VII.F.

<sup>24</sup> See attached Exhibit 4 for a sample advertisement.

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, TruConnect 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.

**E. TruConnect Requests Designation Throughout Its Service Area in Utah**

TruConnect is not a rural telephone company as defined in Section 153(37) of the Act (47 U.S.C. § 153(37)). Accordingly, the Company is required to describe the geographic area(s) within which it requests designation as an ETC. TruConnect requests designation as an ETC that is statewide in scope, to allow the Company to provide Lifeline service wherever its underlying facilities-based providers have wireless coverage.<sup>25</sup> TruConnect understands that its service area may overlap with rural carriers in Utah, but maintains that the public interest factors described below justify its designation in these carriers' service areas, especially because it seeks ETC designation solely to utilize USF funding to provide Lifeline service to qualified low-income consumers. It is not eligible for and does not seek Link-Up or high cost support.

**F. Commitment to Comply with Applicable Service Requirements**

In accordance with 47 C.F.R. § 54.202(a)(1)(i), and by the attached certification, TruConnect commits to comply with the service requirements applicable to the low-income support that it receives.<sup>26</sup> Because TruConnect seeks ETC designation in order to provide supported services only under subpart E of Part 54 of the Commission's Rules, submission of a five-year plan under 47 C.F.R. § 54.202(a)(1)(ii) is not required.

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<sup>25</sup> The current zip code coverage footprint is attached hereto as Exhibit 5, along with a list of covered exchanges.

<sup>26</sup> See *Lifeline and Link Up Reform Order* at page 208, revised § 54.202(a)(1)(i).

**G. Ability to Remain Functional in Emergency Situations**

In accordance with 47 CFR §54.202(a)(2), TruConnect has the ability to remain functional in emergency situations. Through its agreements with its Underlying Carrier(s), TruConnect provides to its customers the same ability to remain functional in emergency situations as currently provided by the Underlying Carrier(s) to their own customers, 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.

**H. Commitment to Consumer Protection and Service Quality**

Under FCC guidelines, an ETC applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards, and wireless applicants may satisfy this requirement with a commitment to comply with the Cellular Telecommunications and Internet Association’s (“CTIA”) Consumer Code for Wireless Service.<sup>27</sup> The Company hereby commits to comply with the CTIA Consumer Code for Wireless Service.

**I. Financial and Technical Capability**

In accordance with 47 CFR §54.202(a)(4), TruConnect is financially and technically capable of providing Lifeline-supported services. The Company has been offering telecommunications service since 1998 and began providing non-Lifeline wireless service in October 2012 and Lifeline-supported wireless service in May 2013. TruConnect already successfully provides wireless services nationwide, including Lifeline services in fifteen (15) states.<sup>28</sup> TruConnect has not been subject to enforcement sanctions, and has not been subject to

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<sup>27</sup> See 47 C.F.R. § 54.202(a)(3).

<sup>28</sup> TruConnect is in the process, over the next few months, of launching its wireless Lifeline service in the remaining states in which it has been designated as an ETC.

ETC revocation proceedings except as explained in the footnote below.<sup>29</sup> The Company has operated as a telecommunications carrier for twenty years and has never had to file for bankruptcy protection, and is supported by the resources of its parent, TSC Acquisition Corporation. TruConnect does not, and does not intend to, offer exclusively Lifeline-supported services—and is therefore not exclusively dependent on USAC for its revenue. The result of TruConnect’s efforts is that it is a profitable, liquid company, fully capable of honoring all its service obligations to customers and regulatory obligations to state and federal regulators. Furthermore, the senior management of TruConnect has great depth in the telecommunications industry and offers extensive telecommunications business technical and managerial expertise to the Company.<sup>30</sup> TruConnect will be providing resold wireless service, and therefore will also rely upon the managerial and technical expertise of its underlying carriers.

#### **J. Commitment to Comply with Certification and Verification Requirements**

Section 54.410 of the FCC’s Rules requires ETCs to certify and verify a Lifeline customer’s initial and continued eligibility. TruConnect will certify and verify consumer eligibility in accordance with 47 C.F.R. § 54.410, utilizing the streamlined eligibility criteria

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<sup>29</sup> In a Memorandum dated October 18, 2017 in Docket No. 3005-TI-102, Wisconsin Commission (“WI PSC”) Staff noted concerns that the Company was not providing Lifeline service in Wisconsin and may have failed to inform the WI PSC of changes to contact numbers and web sites. TruConnect acknowledges that the Company should have informed the WI PSC of changes to contact numbers and web sites, a process which was overlooked due to internal restructuring and employee turnover in 2016 and 2017. TruConnect has put measures in place to ensure consistent, timely compliance going forward by contracting with the following independent third-party compliance vendors: FAS Tek Compliance Solutions, Inc. for ongoing regulatory compliance and reporting; Expert Telecom Compliance, Inc. for ETC-specific compliance; Telecom Professionals, Inc. for ongoing sales and use tax and E-911 compliance; and Lance J.M. Steinhart, P.C. for legal and regulatory services, including maintaining current contact information with regulatory entities, as well as legal advice regarding operations, marketing and compliance, rate changes and service area expansions, advice regarding state and federal ETC Lifeline rulemakings and rule changes, and general monitoring of Lifeline notices and proceedings that could potentially affect TruConnect. These third-party vendors will provide industry expertise and add a layer of accountability and protection regardless of unforeseen internal personnel changes, although in addition, the Company has dedicated staff to work with these aforementioned compliance providers. Regrettably, as a result of TruConnect not updating its address with the WI PSC, the Company did not receive notice of the proceeding and proposed revocation of its ETC designation, and therefore the Company’s Wisconsin ETC designation was revoked effective December 19, 2017 without input from TruConnect. TruConnect is currently in the process of refile for ETC designation in Wisconsin.

<sup>30</sup> See Exhibit 6 for key management bios.

implemented by the *Lifeline Modernization Order* (see 47 C.F.R. § 54.409), and will annually recertify the continued eligibility of all of its subscribers. The Company will also comply with applicable Commission requirements, including the certification and verification process developed within Commission Docket No. 10-2528-01 to the extent such processes do not contradict FCC rules.

**K. Commitment to Comply with Reporting Requirements**

TruConnect will provide the Commission a copy of its annual certifications and Lifeline recertification results pursuant to 47 C.F.R. § 54.416 (i.e. FCC Form 555), as well as a copy of its annual report filed pursuant to 47 C.F.R. § 54.422 (i.e. FCC Form 481), and other reports the Commission deems necessary as a condition of ETC designation.

**L. Commitment to Comply with Regulations Imposed By The Commission**

By this Petition, TruConnect hereby asserts its willingness and ability to comply with all the rules and regulations that the Commission may lawfully impose upon the Company's provision of service contemplated by this Petition. TruConnect commits to pay all applicable state and local regulatory fees, including, but not limited to, universal service fees, emergency services, and relay services. Upon Commission request, the Company is prepared to answer questions or present additional testimony or other evidence about its services within the state.

**V. DESIGNATION OF TRUCONNECT AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST**

One of the principal goals of the Act, as amended by the Telecommunications Act of 1996, is "to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies" to all citizens, regardless of geographic location or income.<sup>31</sup> Designation of TruConnect as an ETC in

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<sup>31</sup> *Telecommunications Act of 1996*, Pub. L. No. 104-104, 110 Stat. 56.

Utah will further the public interest by providing low-income Utah consumers with low prices and high quality services. Many low-income customers in Utah have yet to reap the full benefits of the intensely competitive wireless market. Whether because of financial constraints, poor credit history or intermittent employment, these consumers often lack the countless choices available to most consumers.

The instant request for ETC designation must be examined in light of the Act's goal of providing low-income consumers with access to telecommunications services. The primary purpose of universal service is to ensure that consumers—particularly low-income consumers—receive affordable and comparable telecommunications services. Given this context, designating TruConnect as an ETC would significantly benefit low-income consumers eligible for Lifeline service in the State of Utah—the intended beneficiaries of universal service.

**A. Advantages of TruConnect's Service Offering**

The public interest benefits of the Company's wireless service include larger local calling areas (as compared to traditional wireline carriers), the convenience and security afforded by mobile telephone service, the opportunity for customers to control cost by receiving a preset amount of monthly airtime at no charge, the ability to purchase additional usage at flexible and affordable amounts in the event that included usage has been exhausted, 911 service and, where available, E911 service in accordance with current FCC requirements. The Company's Lifeline customers will receive the same high-quality wireless services and exceptional customer service provided to all Company customers. TruConnect's Lifeline rate plans will not only allow feature-rich mobile connectivity for qualifying subscribers at no cost to the subscriber, but also will bring a variety of rate plans into the reach of Lifeline customers that are comparable in

minutes and features to those available to post-paid wireless subscribers – but at low Lifeline rates and without the burden of credit checks or contracts.

TruConnect’s Lifeline program will provide low-income Utah residents with the convenience and security offered by wireless services—even if their financial position deteriorates. Low-income individuals can greatly benefit from the advantages offered by the Company’s Lifeline service, thus allowing those adversely impacted by the economy or job loss to have access to wholly-supported wireless service to assist in emergency situations, facilitate job search efforts, and to maintain contact with family members. It is also a commonly accepted fact that in today’s market all consumers, including qualified Lifeline customers, view the portability and convenience of wireless service not as a luxury, but as a necessity. Mobile service allows children to reach their parents, wherever they may be, allows a person seeking employment the ability to be contacted by potential employers, and provides end users with the ability to contact emergency service providers, regardless of location. Providing TruConnect with the authority necessary to offer discounted Lifeline service to those most in danger of losing wireless service altogether undoubtedly promotes the public interest.

Moreover, grant of TruConnect’s Petition will serve the public interest in increasing the number of ETCs in Utah. By granting ETC status to TruConnect, the Commission will enable the Company to increase the number of Utah residents receiving Lifeline support, thereby increasing the amount of USF money flowing into Utah. In sum, ETC designation in the State of Utah would enable TruConnect to provide all of the public benefits cited by the FCC in its analysis in the *Virgin Mobile Order*. Namely, TruConnect would provide “increased consumer choice, high-quality service offerings, and mobility,”<sup>32</sup> as well as the safety and security of effective 911 and

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<sup>32</sup> See *Virgin Mobile Order*, 24 FCC Rcd at 3395 ¶ 38.



E911 services.<sup>33</sup>

## **B. The Benefits of Competitive Choice**

The benefits to consumers of being able to choose from among a variety of telecommunications service providers have been acknowledged by the FCC for more than three decades.<sup>34</sup> Designation of TruConnect as an ETC will promote competition and innovation, and spur other carriers to target low-income consumers with service offerings tailored to their needs, resulting in improved services to consumers. Designation of TruConnect as an ETC will help assure that quality services are available at “just, reasonable, and affordable rates” as envisioned in the Act.<sup>35</sup> Introducing TruConnect into the market as an additional wireless ETC provider will afford low income Utah residents a wider choice of providers and available services while enhancing a competitive marketplace as ETCs compete for a finite number of Lifeline-eligible customers. Increasing the competitive marketplace of providers has the potential to effectively increase the penetration rate and reduce the number of individuals not connected to the PSTN.

## **C. Impact on the Universal Service Fund**

With Lifeline, ETCs only receive support for customers they obtain. The amount of support available to an eligible subscriber is exactly the same whether the support is given through a company such as TruConnect or the Incumbent LEC operating in the same service area. The number of persons eligible for Lifeline support is the same regardless of the number of ETCs; thus, TruConnect will only increase the amount of USF Lifeline funding in situations where it obtains Lifeline customers not already enrolled in another ETC’s Lifeline program. By implementing the safeguards set forth in the *Lifeline and Link Up Reform Order* and utilizing the

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<sup>33</sup> See *Id.* at 3391 ¶ 23.

<sup>34</sup> See, e.g., *Specialized Common Carrier Services*, 29 FCC Rcd 870 (1971).

<sup>35</sup> See 47 U.S.C. § 254(b)(1).

NLAD and National Verifier (once in place), the likelihood that TruConnect’s customers are not eligible or are receiving duplicative support either individually or within their household is greatly minimized. TruConnect’s ability to increase the Lifeline participation rate of qualified low-income individuals will further the goal of Congress to provide all individuals with affordable access to telecommunications service, and thus any incremental increases in Lifeline expenditures are far outweighed by the significant public interest benefits of expanding the availability of affordable wireless services to low-income consumers. According to the FCC, “the additional choice and service options of another wireless reseller offering a service for low-income consumers represents a significant benefit for consumers and is in the public interest,” and “A new entrant should incent existing wireless reseller ETCs to offer better service and terms to their customers, which provides additional evidence that forbearance in the context of the Lifeline program outweighs the potential costs.”<sup>36</sup>

## **VI. ANTI-DRUG ABUSE CERTIFICATION**

TruConnect certifies that no party to this Petition is subject to denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

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<sup>36</sup> See *Petition of i-wireless, LLC for Forbearance from 47 U.S.C § 214(e)(1)(A)*, Order, FCC 10-117 (rel. June 25, 2010) at ¶ 19.

## VII. CONCLUSION

Based on the foregoing, designation of TruConnect as an ETC in the State of Utah accords with the requirements of Section 214(e)(2) of the Act and is in the public interest.

WHEREFORE, TruConnect respectfully requests that the Commission promptly designate TruConnect as an ETC in the State of Utah for purposes of participating in the Lifeline program.

Respectfully submitted,

*s/ Lance J.M. Steinhart*

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

April 3, 2018

**EXHIBIT 1**

**Certification of Company Officer**



**EXHIBIT 2**

**Proposed Lifeline Offering**

Sage Telecom Communications, LLC d/b/a TruConnect

<b>Plan</b>	<b>Minutes</b>	<b>Text</b>	<b>Data</b>	<b>Net Cost to Lifeline Customer</b>	<b>Net Cost to Tribal Lifeline Customer</b>
<b>Basic Lifeline Plan</b>	750	Unlimited	1 GB	<b>\$ 0.00</b>	<b>N/A</b>
<b>Bundled Plan 1</b>	Unlimited	Unlimited	1.5 GB	<b>\$15.00</b>	<b>N/A</b>
<b>Bundled Plan 2</b>	Unlimited	Unlimited	3.0 GB	<b>\$25.00</b>	<b>\$ 0.00</b>
<b>Bundled Plan 3</b>	Unlimited	Unlimited	5.0 GB	<b>\$35.00</b>	<b>\$10.00</b>

Plans Include:

- Free data-capable device
- Free calls to Company Customer Service
- Free calls to 911 emergency services
- Free access to Voicemail, Caller-ID, Call Waiting, Call Forwarding, and 3-Way Calling
- Free Domestic Long Distance
- Data at 3G speeds or higher

**Additional airtime available for purchase**

<b>Top Up Options*</b>			
<b>Price</b>	<b>Domestic Minutes**</b>	<b>Int'l Minutes**</b>	<b>Data**</b>
\$5.00	500	Unlimited to Mexico, China, Canada & 55 more or \$5 additional international minutes	500MB
\$10.00	1000		1.0 GB
Included in all Plans		Unlimited to Mexico, China, Canada	

\* All Top Up options expire after 30 days

\*\* Top Up options are “either/or”, meaning for example, for the top up price of \$5.00, customers can purchase *either* 500 Domestic minutes *or* 500 MB of data or Unlimited to Mexico, China, Canada & 55 more or \$5 additional international minutes

**EXHIBIT 3**

**FCC-Approved Compliance Plan**



**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

_____ )	
In the Matter of )	
)	
Federal-State Joint Board on )	WC Docket No. 09-197
Universal Service )	
)	
Lifeline and Link Up Reform Modernization) )	WC Docket No. 11-42
)	
_____ )	

**REVISED COMPLIANCE PLAN OF SAGE TELECOM, INC.**

Sage Telecom, Inc. (“Sage”), by its attorneys, respectfully submits this Compliance Plan (“Plan”) for the purposes of seeking federal Lifeline support for wireless service under the Universal Service Fund’s Low Income Program.

In the *Lifeline Reform Order*,<sup>1</sup> the Commission adopted rules and procedures through which it instituted “blanket forbearance” from the applications of the facilities requirement to all telecommunications carriers seeking a limited ETC designation to provide wireless Lifeline services. In order to qualify for this blanket forbearance, the Commission requires carriers to comply with certain 911 requirements and file and receive approval of a compliance plan providing specific information about its service offerings and procedures to safeguard against waste, fraud and abuse.

Therefore, Sage respectfully submits this Plan in accordance with the Lifeline Reform Order and instructions set forth in the Wireline Competition Bureau *Public Notice* issued on

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<sup>1</sup> *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 11-12, ¶ 172 (rel. Feb. 6, 2012) (“*Lifeline Reform Order*”).

February 29, 2012.<sup>2</sup> Sage seeks approval of this compliance plan only for the provision of Lifeline support to provide wireless services nationwide, as the company offers wireline service as a facilities-based carrier under the approval of state commissions. This Plan sets forth Sage's service offerings and the procedures and measures it will use to safeguard against waste, fraud and abuse. In support of this request, Sage provides the following information:

**(1) Information about the carrier and the Lifeline plans it intends to offer:**

**(a) names and identifiers used by the carrier, its holding company, operating company and all affiliates;**

Sage is a Texas corporation with offices located at 10440 N Central Expressway, Suite 700, Dallas, TX 75231.<sup>3</sup> The company began operations as a competitive local exchange carrier ("CLEC") providing traditional wireline service in 1998. Sage is authorized as a CLEC in 25 additional states and as an interexchange carrier in Colorado,<sup>4</sup> and provides service in Arkansas, California, Connecticut, Illinois, Kansas, Michigan, Missouri, Ohio, Oklahoma, Texas and Wisconsin. Sage was authorized as an ETC in Texas in 2002, and Sage also a provider of high speed Internet services. Sage has also been designated as an ETC in a number of other states for the provisions of wireline service Lifeline service and currently has wireline Lifeline customers in five states for which it is reimbursed through state and/or federal programs, depending upon the state and the customer. Specifically, in California, Sage receives support only from the CPUC's Low Income Programs. Sage also receives support from state programs in Kansas, Texas and Wisconsin. Less than 20% of Sage's customers receive a subsidy from a low income

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<sup>2</sup> Public Notice, Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order, DA 12-314, (Rel. Feb. 29. 2012).

<sup>3</sup> Due to a planned move of corporate offices, this address is effective after October 26, 2012.

<sup>4</sup> Technically, the services provided by Sage in Texas are under the corporate entity Sage Telecom of Texas, LP, and services in all other states are provided by Sage Telecom, Inc. However, services are all offered to consumers under the trade name "Sage Telecom, Inc."

program. The company is planning to launch wireless service on a non-Lifeline basis, primarily in Texas, through an MVNO arrangement with Sprint. As the company would like to expand this offering to Lifeline customers, Sage seeks approval of a compliance plan to offer Lifeline service using this resold service.

Sage is wholly-owned by TSC Acquisition Corporation (“TSC”). TSC also owns Telscape Communications, Inc., A CLEC based in California that primarily serves customers in that state on both a wireline and wireless basis. Sage, through its common ownership with Telscape, has collective access to a broader market and combined subscriber growth. Sage is also affiliated with TruConnect Mobile, LLC (“TruConnect”), through partial common ownership. TruConnect is 40% owned by TSC, Sage’s parent company as described above. TruConnect provides mobile broadband data services and does not provide any services supported by the low income program.

**(b) detailed information demonstrating the carrier is financially and technically capable of providing the supported Lifeline services in compliance with the Commission’s rules;**

As a long-time provider of wireline services, particularly in Texas, Sage has a proven record of technical and financial qualifications. The company provides facilities-based wireline service in numerous states and has sophisticated back-office, operational and support systems, which allows it to operate at lower costs and pass those savings on to its subscribers. As a carrier who has provided service for nearly 14 years, Sage possesses the financial viability, as well as the expertise to continue to provide affordable and quality service to customers and has the proven experience to maintain its compliance with all applicable federal and state regulatory guidelines. Sage derives the majority of its revenue from the telecommunications services it provides to its customers. Sage does not and will not rely exclusively on the Universal Service

Fund (“USF”) disbursements to operate, but rather relies on revenues it receives from providing non-Lifeline wireline (and soon wireless) service, the payment for service by Lifeline customers,<sup>5</sup> as well as high-speed Internet services. In addition, Sage has not been subject to any type of enforcement action or ETC revocation proceeding by the FCC or any state utility regulatory commission.

Sage is working with Sprint Spectrum to resell Sprint’s wireless services to non-Lifeline customers in Texas and elsewhere. As a Lifeline service provider, Sage would continue to work with Sprint, who provides the necessary network infrastructure and wireless facilities necessary for the operation of Sage’s services as a Mobile Virtual Network Operator (“MVNO”). As the Commission is aware, Sprint is a large, nationwide carrier who provides similar service to other wireless Lifeline providers operating as MVNOs. Sage’s agreement and partnership with Sprint further demonstrates its financial and technical capability to provide these services.

**(c) detailed information, including geographic locations, of the carrier’s current service offerings if the carrier currently offers service;**

As detailed in response to Question 1(a) above, Sage currently provides local and interstate wireline and is planning to provide wireless services in numerous states, with a particular emphasis on Texas.

**(d) the terms and conditions of each Lifeline service plan offering, including rates, the number of minutes provided and additional charges, if any, for toll calls;**

At this time, Sage plans to offer the following wireless Lifeline plans and services, subject to state specific requirements or requests from state PUCs. These plans are offered to both Lifeline and non-Lifeline subscribers, with a discount applied to the Lifeline customer. Services will be offered on a prepaid basis, and potentially also on a postpaid basis. All services

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<sup>5</sup> All of Sage’s Lifeline wireline customers currently pay a monthly fee for the discounted service.

will normally have an activation fee and will likely require a monthly payment from the customer. The prices listed below show the basic, non-Lifeline price and the price to the consumer with the \$9.25 Lifeline credit applied. All plans will likely require a monthly payment by the customer. Sage commits to providing a minimum of 250 minutes per month for the \$9.25 subsidy.

Sage is still determining the exact plans it will offer (reiterating the condition that plans will provide a minimum of 250 minutes for the \$9.25 subsidy), but a sample plan would be as follows:

**ValuMobile Plus** Price: \$24.25 per month/Lifeline Price: \$15.00

Features	Cost
500 minutes Voice/Text	Included
Call Waiting	Included
3 Way Calling	Included
Caller ID	Included
VoiceMail	Included
911	Free
611 (Customer Service)	Free
Directory Assistance	\$1.50

Activation Fee: \$25.00

**Additional Minutes:** For all service plans the customer can purchase additional voice, data, MMS, text minutes for \$0.05 per minute with a minimum purchase of \$5.00. For example, 100 additional minutes will cost \$5.00. The customer will have the ability to purchase 100 minutes (\$5.00); 200 minutes (\$10.00); 300 minutes (\$15.00) and 500 minutes (\$25.00). For Unlimited service plans the customer will not need additional voice or text but will need to purchase additional minutes for data and MMS. MMS is priced at \$0.15 per minute and Data is \$0.05 per MB.

**Text Messages:** The service plans include text messaging; text messaging rates are assessed at 1 minute per text message sent and 1 minute per text message received.

**Other:** Plans do not permit rollover minutes. Top Ups are available for a 30 day period as long as the customer renews the service at the normal plan rate. Plans do not allow roaming. The \$25.00 Activation Fee includes selection of a basic handset which is activated and provided ready for use. Customers are allowed to call internationally but will be assessed the international rates. International text rates are \$0.20 per minute for messages sent or received. Special Promotional offer: 10 MB data FREE for 3 months with the selection of a data capable phone.

**(e) all other certifications required under newly amended section 54.202 of the Commission's rules.**

Section 54.202 requires ETCs to (1) certify that it will comply with the applicable service requirements; (2) file a five-year plan detailing proposed improvements or upgrades in the network unless the ETC is receiving only Lifeline support; (3) demonstrate that it will continue to function in emergency situations including reasonable back-up backup power and emergency traffic management; (4) demonstrate that the carrier will comply with applicable consumer protection and service quality standards; (5) demonstrate that it is financially and technical qualified to provide Lifeline services that comply with the applicable rules; and (6) provide information concerning the terms and conditions of the service plans offered to Lifeline customers.

In response to item (1), Sage certifies that it will comply with applicable service requirements and regulations for Lifeline support.

In response to item (2), Sage is not required to submit a five year plan since it is seeking to obtain only Lifeline support for its eligible customers.

In response to item (3), as a CLEC provider in multiple states for over 14 years, Sage has significant experience with emergency preparedness. Sage has detailed Emergency Action and Disaster Recovery Plans in place to respond to emergencies. In addition, Sage's agreement with Sprint provides for the continuation of services during emergencies and sets forth obligations for the service to remain functioning during disasters and similar emergency situations. In addition, as a nationwide carrier and provider of wireless service, Sprint also remains subject to the Commission's authority and must, and does, comply with federal outage reporting requirements.

In response to item (4), Sage certifies that it will comply with the applicable consumer protection and service quality standards. As an operating CLEC in many states, Sage is already subject to states consumer protection and service quality requirements. Sage's wireless Lifeline customers will also receive the same quality service and protections.

Sage's response to items (5) and (6) are provided above and in the provided exhibits

**(2) A detailed explanation of how the carrier will comply with the Commission's new rules relating to determinations of subscriber eligibility for Lifeline services, including all consumer eligibility, consumer enrollment and re-certification procedures as required by Section VI and Appendix C of the Lifeline Reform Order, and a copy of the carrier's certification form;**

Under the *Lifeline Reform Order*, ETCs must comply with eligibility rules for Lifeline services, including initial eligibility, certification, and annual re-certification procedures. In addition to the Commission's rules, Sage must also comply with all certification and verification requirements for Lifeline eligibility established by states where Sage is designated as an ETC. For states that do not have a Lifeline administrator or state agency responsible for determining eligibility and initial certifications and annual certifications, Sage certifies it will comply with the Commission's certification and verification requirements and will follow the procedures outlined below until such time as the Commission implements its planned National Lifeline Accountability Database.

Procedures for Initial Eligibility Determination and Certification of Lifeline Subscribers.

With respect to determining eligibility certification procedures, the rules provide that an ETC must determine a Lifeline applicant's eligibility and provide and receive certification forms with proper documentation from Lifeline subscribers, except where there is a state Lifeline administrator or a state agency responsible for eligibility verification.

In states where there is a third party entity acting as the Lifeline administrator (also referred to as the "Low Income Discount Administrator" or "LIDA" in Texas) who is responsible for determining the eligibility of consumers seeking to subscribe to Lifeline service, sending out certification forms, reviewing documentation and providing ETCs with the appropriate approval of a potential subscriber's eligibility for Lifeline, Sage will comply with the program rules established in those states and will cooperate fully with any state Lifeline administrator.

Based on Sage's history of providing Lifeline and non-Lifeline customers in wireline products, Sage's primary source of signing up Lifeline customers will be via telephone, although some customers may be signed up in person at temporary locations staffed by Sage employees. Visitors to Sage's website will be given information about the program but are required to contact Sage directly via telephone to complete the sign-up process. These callers speak to Sage employees who are specially trained on the Lifeline programs. Sage's customer services representatives will review income- and program-based requirements with applicants via telephone contact. During the initial sign up for service, Sage will (a) require the applicant to confirm that he or she is not already receiving a Lifeline service and that no one else in the applicant's household is subscribed to a Lifeline service in order to avoid providing duplicate services; and (b) inform the applicant of both the income- and program-based eligibility requirements to determine initial eligibility and any state-specific requirements.



Customers are offered the choice to either sign up for service as a non-Lifeline customer pending confirmation of eligibility, or to have their application for service held pending confirmation of eligibility. In the event the customer chooses to proceed, they are processed as a new non-Lifeline customer and the verification process continues as described below. The customer would only be given the Lifeline discount when they have satisfied the verification process, either through the state administrator or Sage's internal process. If the customer is eventually deemed ineligible, they receive no credit. Where the customer chooses to wait for confirmation of eligibility before starting service, the employee will take down the relevant information from the consumer, including payment information, but the order is then held pending verification of eligibility. Only if the customer is determined to be eligible is the order processed.

The Verification process varies by state, in states with a Lifeline administrator, if a new applicant indicates that he or she is eligible for Lifeline service, Sage will provide the applicant's relevant information to the administrator in conformance with any state or Lifeline administrator specific rules. The Lifeline administrator will provide the requisite forms and will be responsible for processing those forms when returned and ensuring the documentation is satisfactory as set forth in state regulations. Sage will not provide Lifeline service or seek reimbursement for providing services to such applicant until it receives a certification of eligibility from the Lifeline administrator.

In states where there is no Lifeline administrator or state agency responsible for determining initial eligibility and certifying Lifeline applicants, Sage will require all applicants to demonstrate either: (1) the applicant's household income is at or below 135% of the Federal Poverty Guidelines based on the income-eligibility criteria set forth in Sections 54.409(a)(1) or

(a)(3) or (2) the applicant participates in Medicaid, Food Stamps, Supplemental Security Income, Federal Public Housing Assistance, Low-Income Home Energy Assistance Program, National School Lunch Program or Temporary Assistance for Needy Families. As required to prevent suspected duplications, Sage will also require the customer to complete the Lifeline Household Worksheet issued by USAC to ensure that duplicate support is not provided to any household. Sage will inform the applicant that any information provided will be submitted to USAC as necessary under the Commission's rules to verify the household is not receiving duplicate Lifeline support.

After confirming initial eligibility either in person or over the phone, Sage will provide the individual with an application via mail requiring him or her to provide certain information and certify that they meet either the income-based eligibility requirements or the program-based requirements, make certain certifications and submit documentation. Specifically, Sage's Lifeline application form will collect the following information from the potential Lifeline customers: (i) the subscriber's full name; (ii) the subscriber's full residential street address (P.O. Boxes will not be acceptable); (iii) whether the residential address is permanent or temporary; (iv) the subscriber's billing address, if different; (v) the subscriber's date of birth; (vi) the last four digits of the subscriber's Social Security number (or Tribal identification number if the subscriber is a member of a Tribal nation and does not have a Social Security number); (vii) if the subscriber is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the subscriber, or his or her dependents, or his or her household receives benefits; and (viii) if the subscriber is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.

In addition, as part of the Lifeline application, Sage will require all Lifeline applicants to certify, under penalty of perjury, that:

- the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline either because the household receives benefits from a state or federal assistance program (and list the name of the program) or has income at or below 135% of the Federal Poverty Guidelines;
- the applicant has provided documentation to Sage that correctly and accurately confirms the subscriber's household income or participation in the above-listed program(s);
- the applicant will notify its carrier within thirty (30) days if, for any reason, he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the applicant no longer meets the income-based or program-based criteria for receiving Lifeline support, the applicant is receiving more than one Lifeline benefit, or another member of the subscriber's household is receiving a Lifeline benefit. The applicant will also certify that they understand this requirement and may be subject to penalties if they fail to notify Sage;
- if the applicant moves to a new address, he or she will provide that new address to the eligible telecommunications carrier within thirty (30) days;
- if the applicant provided a temporary residential address to the eligible telecommunications carrier, he or she will be required to verify his or her temporary residential address every ninety (90) days;
- the applicant acknowledges that the subscriber will be required to re-certify his or her continued eligibility for Lifeline at any time, and the applicant's failure to re-certify as to his or her continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits;
- the applicant's household will receive only one Lifeline service and, to the best of his or her knowledge, the subscriber's household is not already receiving a Lifeline service;
- the information contained in the applicant's certification form is true and correct to the best of his or her knowledge, that providing false or fraudulent documentation or information in order to receive assistance is punishable by fines, imprisonment, de-enrollment or being barred from the program;
- That a violation of the one-per-household rule constitutes a violation of FCC rules and will result in their de-enrollment from the Lifeline program
- the applicant understands that Lifeline is a non-transferable benefit and the service may not be transfers to anyone else; and
- the applicant understands their information, including name, telephone number and address, will be given to the Universal Service Administrative Company (USAC) and/or its agents for the purpose of verifying the applicant and the applicant's household do not

receive more than one Lifeline benefit and consenting to the inclusion of that information into a Lifeline database.

A sample Sage application is attached hereto as Exhibit A.

This application is mailed by Sage to the customer for completion and is returned to Sage for review and certification. All applications are reviewed by Sage employees. Should Sage engage sales agents to assist in signing up customers, those applications will also be reviewed by Sage employees to ensure the applicant's eligibility.<sup>6</sup> This review includes a review to determine eligibility as well as a duplicate review process described below. Sage will make itself available as a direct point of contact with all Lifeline applicants. In addition, all Sage employees who have contact with potential Lifeline customers will be fully trained on the state and Commission Lifeline eligibility rules.

If Sage cannot determine a prospective subscriber's eligibility through a review of an appropriate federal or state database, Sage personnel will require the submission of appropriate documentation required to establish income-based and program-based eligibility and will review each subscriber's documentation for compliance with the eligibility criteria. If documentation is not sufficient or if the application is incomplete, then Sage will deny the application and inform the applicant of the reason for such rejection. For applicants submitting proof of income-eligibility or program-based eligibility, Sage will not retain copies of such documentation but will maintain accurate records detailing how the customer demonstrated his or her eligibility.<sup>7</sup> In addition, if the subscriber provides Sage with a temporary address, it will verify with the subscriber every 90 days that this address remains valid. If the subscriber fails to respond to the Sage within 30 days, the subscriber will be de-enrolled from the Lifeline program.

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<sup>6</sup> In states with a Lifeline Administrator, this process would be handled pursuant to the procedures of the Administrator.

<sup>7</sup> 47 C.F.R. §§ 54.410(b)(1)(ii)-(iii) and 54.410(c)(1)(ii)-(iii).

Procedures for Annual Re-Certification. Similar to the initial certification process, an ETC must annually certify all subscribers, unless there is a Lifeline administrator that is responsible for re-certification. In states where a Lifeline administrator is responsible for completing annual re-certifications, Sage will rely on such administrator completing the annual certification. If the Lifeline administrator provides notice to Sage that a current subscriber did not re-certify, then Sage will comply with the de-enrollment requirements required by the FCC's rules. Sage will cooperate fully with any Lifeline administrator and take any necessary steps to ensure it is in compliance with both state and federal re-certification procedures.

In states where there is not a Lifeline administrator, Sage will require its Lifeline subscriber to annually re-certify their eligibility as set forth in Rules 54.410(f)(2) and (f)(5) and 54.405(e)(4). Sage may complete the re-certification process on a rolling basis throughout the year. If Sage cannot determine on-going eligibility by accessing a qualifying database, Sage will re-certify the continued eligibility of its subscribers by contacting them in person, in writing (by mail), by phone, by text message, by email or otherwise through the Internet.<sup>8</sup> Alternatively, beginning in 2013, Sage may elect to have the USAC administer the annual self-certification process.<sup>9</sup>

As part of the re-certification process, Sage will inform its Lifeline subscribers that they must confirm eligibility to retain Lifeline benefits, when Lifeline benefits will be terminated if confirmation of eligibility is not provided and how to contact Sage for more information or assistance. If a Lifeline subscriber does not respond to the notice within 30 days, Sage will send

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<sup>8</sup> *Lifeline Reform Order*, ¶ 130.

<sup>9</sup> *Id.*, ¶ 133.

a notice of impending termination. Subscribers who do not respond to the impending termination notice will be de-enrolled from the Lifeline program within five business days.<sup>10</sup>

**(3) A detailed explanation of how the carrier will comply with the forbearance conditions relating to public safety and 911/E-911 access;**

The Commission conditioned its grant of forbearance on an ETC (a) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; (b) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services.<sup>11</sup> Sage's wireless service currently complies with these requirements and will continue to comply with these conditions.

Specifically, Sage provides its wireless subscribers with 911/E911 access at the time their service is initiated, regardless of activation status and availability of minutes and provides its subscribers with E911-compliant handsets. It is the company's practice to provide access to 911/E911 to the extent these services are available from the underlying carrier, Sprint. Sage also enables 911 emergency calling from all properly activated handsets regardless of whether the account associated with the handset is active, suspended to terminated. Sage will transmit all 911 calls initiated from any of its handsets even if the associated account has no remaining minutes.

In addition, all phones provided by Sage are 911/E911 compliant. Sage uses phones from Sprint that, based on representations made to Sage by Sprint, have been through the applicable certification process in the company's labs. In the event that a customer does not have an E911-complaint handset, Sage will replace it with a compliant handset at no charge. All new

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<sup>10</sup> 47 C.F.R. § 54.405(e)(4).

<sup>11</sup> *Lifeline Reform Order*, ¶ 373.

customers who qualify for Lifeline services with Sage will receive a 911/E911-compliant handset free of charge.

**(4) A detailed explanation of how the carrier will comply with the Commission's marketing and disclosure requirements for participation in the Lifeline program;**

Sage has experience in providing clear, concise and consistent marketing and disclosure information to its wireline Lifeline to its customers. With respect to its wireless services, Sage will emphasize in clear, easily understood language: (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. Sage has and will continue to clearly disclose its name (Sage or Sage Wireless) on all marketing materials. A sample advertisement to be used as a model for creation of state-specific advertisements is attached hereto as Exhibit B. Please note that the two pages of the exhibit represents the front and back of single page document.

**(5) A detailed explanation of the carrier's procedures and efforts to prevent waste, fraud and abuse in connection with Lifeline funds, including but not limited to, procedures the carrier has in place to prevent duplicate Lifeline subsidies within its own subscriber base, procedures the carrier undertakes to de-enroll subscribers receiving more than one Lifeline subsidy per household, information regarding the carrier's toll limitation service, if applicable, and the carrier's non-usage policy, if applicable.**

Sage fully understands and shares the Commission's commitment to minimize waste, fraud and abuse with respect to the Lifeline program. Sage derives less than a quarter of its revenue from Low Income service, and does offer a wireline low income service in a number of states both with and without an administrator. Nonetheless, Sage has focused its operations in a

few states, with a goal of focused growth, to be offered initially in Texas, and then into other states in which Sage is already a wireline ETC. This approach has allowed Sage to refine its business practices and to implement policies consistent with the Commission's goal of minimizing waste, fraud and abuse before launching its service nationwide at some time in the future.

Prevention of Duplicates In Sage's Subscriber Base. At time of initial sign up of a new subscriber, the subscriber's service address is validated for accuracy against the USPS ("United States Postal Service") database and saved in the USPS-approved format, which permits the Sage subscriber database to more accurately prevent duplicates by preventing variations of the same address from appearing multiple times in the database. Once the address is validated for accuracy and format, Sage can check it in available databases or provide it to the Lifeline administrator, where applicable, to be checked against addresses for all Lifeline customer addresses for the entire state.

In addition, while it is anticipated that Sage and its affiliate, Telscape will only operate in different states, to the extent that they have Lifeline customers in the same state, customers can be checked against each company's records to further avoid duplication.

Activation and Non-Usage Policy. Sage will not consider a wireless subscriber activated until the customer has chosen a *non-Lifeline* service plan, activates their service by paying the activation fee, and then applies for and is approved for a Lifeline service plan. Adhering to this "prequalification guideline" prevents waste, fraud and abuse by requiring customers to first sign up for service at regular rates and then only provide discounted service once the customer's eligibility has been confirmed through verification or a Lifeline administrator. As such, Sage will not seek reimbursement for any wireless subscriber until the subscriber activates service and



is approved by the Lifeline administrator or by Sage, in states without a third party Lifeline administrator. Customers who wish to be confirmed as an eligible Lifeline subscriber prior to commencing service can place a non-Lifeline order and have the order held pending verification of eligibility as described above. Because customers do not receive their handset and service until they have an order processed and the activation fee is paid, customers receive activated handsets. Thus, there is no possibility of Sage receiving reimbursement for a customer who does not have an active handset. After the order is processed, Sage personnel activate, configure and test the handsets before they are sent to the consumer. Thus all customers receive an activated handset.

As required by the *Lifeline Reform Order*, Sage has implemented a non-usage policy under which it will de-enroll Lifeline customers that have not used the Sage's Lifeline service for 60 consecutive days. When consumers sign-up for Sage's service, Sage will inform them about the usage requirement. If a Sage Lifeline customer's account does not reflect any usage during any consecutive 60-day period, Sage will deactivate the customer's Lifeline service. Accounts will be deemed active if the Lifeline subscriber: (a) completes an outbound call; (b) purchases minutes or an additional month of service to add to the subscriber's Lifeline service plan; (c) answers an incoming call from a party other than Sage, its agent or representative; or (d) responds to a direct contact from Sage and confirms that he or she wants to continue receiving the Lifeline service.<sup>12</sup>

For Lifeline subscribers failing to use their Lifeline service for a 60-day consecutive period as described above, Sage will provide a clear, easily understood notice that the subscriber's failure to use the Lifeline service within the 30-day notice period will result in

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<sup>12</sup> See *Lifeline Reform Order*, ¶ 261; 47 C.F.R. § 54.407(c)(2).

service termination for non-usage. Sage will not terminate service to Lifeline subscribers that use their Lifeline service within 30 days of Sage providing said notice.<sup>13</sup>

Cooperate with Federal and State Regulators and Lifeline Administrators. Sage will cooperate with the Commission and has and will continue to cooperate with state regulators and Lifeline administrators to prevent waste, fraud and abuse. Sage will, for example:

- As applicable, participate in industry working groups conducted by or in coordination with state commissions and Lifeline administrators;
- Respond to requests from the Commission, USAC or state commissions concerning consumers' eligibility to be enrolled in Lifeline service, among other matters;
- Upon having a reasonable basis and/or upon any notification from federal or state commissions and/or Lifeline administrators, timely investigate issues concerning a Sage Lifeline customer receiving service from another carrier or customers receiving more than one Lifeline subsidy per household;
- As applicable and when available, access the National Lifeline Accountability Database to determine if an applicant is currently receiving Lifeline service from another carrier or if another person residing at the applicant's residential address is receiving Lifeline service; and
- Comply with federal and state audit requirements.

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<sup>13</sup> 47 C.F.R. § 54.405(e)(3).

## CONCLUSION

Sage respectfully submits that the foregoing Compliance Plan fully satisfies the conditions set forth in the *Lifeline Reform Order*. Accordingly, Sage respectfully requests approval of this Compliance Plan so that Sage can provide essential Lifeline wireless service to eligible low-income customers nationwide.

Respectfully submitted,

*/s/ electronically signed*

Douglas D. Orvis II  
Kimberly A. Lacey  
Bingham McCutchen LLP  
2020 K Street, N.W.  
Washington, DC 20006

Date: December 19, 2012

# Exhibits

**EXHIBIT A**  
**CERTIFICATION FORMS**



## **FEDERAL LIFELINE CERTIFICATION FORM**

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### **Lifeline Information**

- Lifeline is a federal benefit and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.
- Only one Lifeline service is available per household.
- A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses.
- A household is not permitted to receive Lifeline benefits from multiple providers.
- You must use your phone every 60 days to maintain service. Usage includes making an outbound call, answering an incoming call. Usage can also include the purchase of additional minutes or payment of your monthly bill. If there is no usage on your account for 60 days you will be de-enrolled from the program.
- Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person.

### **Lifeline Certification Instructions**

**Step 1. Fill out the Customer Information Section.** You must provide the last four digits of your Social Security Number and Date of Birth.

**Step 2. Indicate How You Qualify for Lifeline.** Choose whether you participate in a qualifying program or if you household income falls within the guidelines. You **MUST** send photocopies demonstrating that you participate in the qualifying program or if you qualify based on your household income, you must provide documentation of income that covers one full year. Documentation that does not cover a full year, such as paystubs, the customer must present the same type of documentation covering Three Consecutive Months within the previous twelve months.

**Step 3. Determine If You Qualify for Tribal Land.** Not all customers will be eligible for the Tribal Land benefit. To be eligible for Tribal Lands a customer must reside on Tribal Lands and participate in one of the following programs: Tribally Administered Free School Lunch Program, Tribally Administered Temporary Assistance for Needy Families, Food Distribution Program on Indian Reservations, Head Start (those meeting income standard), and Bureau of Indian Affairs General Assistance.

**Step 4. Certify Customer Eligibility.** Each customer must certify, under penalty of perjury, for receiving Lifeline support, by initialing ALL areas under this section.

**Step 5. Sign Certification Form.** You must print your name and sign the certification form indicating that you are complying with the Lifeline rules.

**Step 6. Supporting Documentation.** Don't forget that you must include supporting documentation which can include a copy of an award letter or card in the qualifying program based. Income documentation could include the prior year's state or federal tax return, paycheck stubs for the most recent 3 months, social security statement of benefits, child support document, retirement/pension statement of benefits, unemployment/workmen's compensation statement of benefits, Federal notice letter of participation in General Assistance, and other official document.

**Step 7. Send the Certification Form.** When completed, you may mail the form to:

Sage Telecom, Inc.  
10440 N Central Expressway  
Suite 700  
Dallas, TX 75231-2228



**FEDERAL LIFELINE CERTIFICATION FORM**

**Step 1. Customer Information Section**

Name of Applicant: \_\_\_\_\_ Telephone Number: \_\_\_\_\_

Account Number: \_\_\_\_\_ Date of Birth: \_\_\_\_\_

Applicant's Service Address (May NOT be a P.O. BOX): \_\_\_\_\_

Please check this box if the above is a Temporary Address. Last Four Digits of SSN: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Billing Address (if different from Service Address): \_\_\_\_\_

**Step 2. Determine How You Qualify For Lifeline (Choose either #1 or #2)**

If the person who receives the benefit is not the Sage account holder, then please provide the name of the person in your household who is receiving the benefits: \_\_\_\_\_.

(#1). I qualify for Lifeline under **Program-Based Criteria** because I participate in the following program.

Check only **ONE** box below:

- Medicaid (not Medicare)
- Low-Income Home Energy Assistance Program (LIHEAP)
- National School Lunch Program (Free Lunch Program)
- Supplemental Nutrition Assistance Program (SNAP)
- Supplemental Security Income (SSI)
- Temporary Assistance for Needy Families (TANF)
- Federal Public Housing Assistance (Section 8)

(#2). I qualify for Lifeline under the **Income-Based Criteria** because my annual household income is at or below 135% of the federal poverty level guidelines. The number of individuals in my residential household is: \_\_\_\_\_ (Number in household)

Annual Income 135% of Federal Poverty Level Thresholds Based on Household Size					
1	2	3	4	5	For each additional person
\$15,080	\$20,426	\$25,772	\$31,118	\$36,464	+\$5,346 per person

**Step 3. Determine If You Qualify for Tribal Lands (If Applicable, Choose either #1 or #2)**

My Tribal ID Number: \_\_\_\_\_ Check **ONE** box below:

(#1)  I qualify for Tribal Lifeline service as an eligible resident on federally recognized tribal land.

(#2) I participate in the following tribally administered program.

- Tribally Administered Free School Lunch Program
- Tribally Administered Temporary Assistance for Need Families
- Food Distribution Program on Indian Reservations
- Head Start (those meeting income standard)
- Bureau of Indian Affairs General Assistance







## FEDERAL LIFELINE RECERTIFICATION FORM

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### **Lifeline Information**

- All Lifeline subscribers must annually recertify their continued eligibility in the Lifeline program.
- Lifeline is a Federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.
- Only one Lifeline service is available per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses.
- A household is not permitted to receive Lifeline benefits from multiple providers (wireline or wireless).
- You must use your phone every 60 days to maintain service. Usage includes making an outbound call, answering an incoming call. Usage can also include the purchase of additional minutes or payment of your monthly bill. If there is no usage on your account for 60 days you will be de-enrolled from the program.
- Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person.
- Failure to recertify will result in being de-enrolled from the program and loss of the Lifeline credits.

### **Instructions for Completing the Attached Lifeline Recertification Form**

**Step 1. Fill out the Customer Information Section.** You must provide the last four digits of your Social Security Number and date of birth.

**Step 2. Indicate How You Continue to Qualify for Lifeline.** Choose whether you continue to participate in a qualifying program or if your annual household income remains at or below the income guidelines. Please choose **Program-Based or Income-Based eligibility**, but not both.

**Step 3. Determine If You Continue to Qualify for Tribal Lifeline. (If Applicable)** Not all customers will be eligible for the Tribal Land benefit. To be eligible for Tribal Lifeline service, the applicant must reside on Federally recognized Tribal Land.

**Step 4. Certify Customer Eligibility.** Each applicant must certify, under penalty of perjury, to receive Lifeline service, by initialing or checking ALL items under this section.

**Step 5. Sign Certification Form.** You must print your name and sign the certification form indicating that you are complying with the Lifeline rules.

**Step 6. Send in the Certification Form.** Upon completion, please mail the completed form to:

Sage Telecom, Inc.  
10440 N Central Expressway  
Suite 700  
Dallas, TX 75231-2228

All steps are required except Step 3 above for processing of your recertification form.

Please send the completed Lifeline Recertification Form to Sage within **30** days upon receipt.



## FEDERAL LIFELINE RECERTIFICATION FORM

### Step 1. Customer Information Section

Name of Applicant: \_\_\_\_\_ Telephone Number: \_\_\_\_\_

Account Number: \_\_\_\_\_ Date of Birth: \_\_\_\_\_

Applicant's Service Address (May NOT be a P.O. BOX): \_\_\_\_\_

Please check this box if the above address is a temporary address. Last Four Digits of SSN: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Billing Address (if different from Service Address): \_\_\_\_\_

### Step 2. Indicate How You Qualify For Lifeline (Choose either #1 or #2)

If the person who receives the benefit is not the Sage account holder, then please provide the name of the person in your household receiving the benefits: \_\_\_\_\_.

**(#1).** I qualify for Lifeline under the **Program-Based Criteria** because I participate in the following program(s):

Check only **ONE** box below:

- Medicaid (not Medicare)
- Supplemental Security Income (SSI)
- Low Income Heat Energy Assistance Program (LIHEAP)
- National School Lunch Program (Free Lunch Program)
- Supplemental Nutrition Assistance Program (SNAP)
- Federal Public Housing Assistance (Section 8)
- Temporary Assistance for Needy Families (TANF)

**(#2).** I qualify for Lifeline under the **Income-Based Criteria** because my annual household income is at or below 135% of the federal poverty level guidelines. The number of individuals in my residential household is:

\_\_\_\_\_. (Number in household)

Annual Income 135% of Federal Poverty Level Thresholds Based on Household Size					
1	2	3	4	5	For each additional person
\$15,080	\$20,426	\$25,772	\$31,118	\$36,464	+\$5,346 per person

### Step 3. Determine If You Qualify for Tribal Lifeline (If Applicable, Choose either #1 or #2)

My Tribal ID Number is: \_\_\_\_\_ Check **ONE** box below:

**(#1)**  I qualify for Tribal Lifeline service as an eligible resident on federally recognized tribal land.

**(#2)** I qualify for Tribal Lifeline service as I participate in the following tribally administered program.

- Tribally Admin Free School Lunch Program
- Tribally administered Temporary Assistance for Needy Families
- Head Start (those meeting income standards)
- Bureau of Indian Affairs General Assistance
- Food Distribution Program on Indian Reservations (FDPIR)

**Step 4. CERTIFY APPLICANT'S ELIGIBILITY**

Please **Check** or **Initial All** the statements below to certify your continued eligibility.

*I certify, under penalty of perjury, that:*

- \_\_\_\_: I continue to meet either the income-based or program-based eligibility criteria.
- \_\_\_\_: I **must** notify Sage within 30 days if, for any reason, I no longer satisfy the criteria for receiving Lifeline including, as applicable, if I no longer meet the income-based or program-based criteria, I am receiving more than one Lifeline service, or another member of my household is receiving a Lifeline service. I understand this requirement to notify Sage if my eligibility changes and that I may be subject to penalties if I fail to follow this notification requirement.
- \_\_\_\_: When I move to a **new address**, I **must** provide my new address to Sage within 30 days.
- \_\_\_\_: I knowlege that my household is eligible to receive only **one** Lifeline service and, to the best of my knowledge, no other member in my household is currently receiving wireline or wireless Lifeline service.
- \_\_\_\_: The information contained in this Lifeline certification form is true and correct to the best of my knowledge.
- \_\_\_\_: I acknowledge that providing false or fraudulent information on this certification form, to receive Lifeline service, is punishable by law.
- \_\_\_\_: I understand that I may be required to recertify my eligibility for Lifeline at any time, and failure to recertify my continued eligibility will result in the de-enrollment and termination of my Lifeline service, pursuant to the Code of Federal Regulation 47 Section 54.405(e)(4).
- \_\_\_\_: I understand that if violation of the one-per-household rule constitutes a violation of FCC rules and will result in my de-enrollment from the Lifeline program.
- \_\_\_\_: If I provided temporary address, I will be required to verify my temporary address every 90 days.
- \_\_\_\_: I authorize Sage to release information concerning my service necessary to administer the Lifeline program (such as name, address, telephone number) to the Universal Service Administrative Company. I give my consent for Sage to verify with the National Lifeline Accountability Database whether I participate in certain low-income assistance programs or verify my income to qualify me for Lifeline service. Sage shall maintain the information in this form and any information received about me from the National Lifeline Accountability Database as confidential customer account information. Failure to provide consent will result in being denied the Lifeline service.

**Step 5. Sign Certification Form.**

You must print your name and sign the certification form indicating you are complying with the Lifeline rules.

\_\_\_\_\_  
 Signature Printed Name Date

You may mail the completed Lifeline form to:  
 Sage Telecom, Inc.  
 10440 N Central Expressway  
 Suite 700  
 Dallas, TX 75231-2228

<b>For Sage Telecom, Inc.'s Use Only!</b>		
Lifeline Recertification Approval. / Denial _____	Service Order Provisioned By _____	Date _____
Lifeline Participating Program / Income Based Criteria _____		

**EXHIBIT B**  
**SAMPLE MARKETING**



# MAKE THE RIGHT CALL SWITCH TO SAGE TELECOM

- ✓ No Contract
- ✓ No Credit Check

- 500 ANYTIME MINUTES FOR ONLY \$15.00 PER MONTH\*
- GET AN AFFORDABLE MOBILE PHONE

**PLUS THIS BONUS:**  
SIGN UP FOR WIRELESS LIFELINE SERVICE AND  
GET AN ADDITIONAL 100 MINUTES FREE!

**CALL TODAY**  
**866-674-6729**

SEE DETAILS ON BACK ▶

# WE'VE GOT A PLAN FOR YOU CALL TODAY 866-674-6729

We make it affordable for you to get low-cost talk and text through a government assistance program called Lifeline. Now you can keep in touch with your family and friends. Qualified customers simply prepay \$15.00 per month and get 500 anytime talk and text.



## YOU GET A GREAT DEAL MORE INCLUDING:

- **FREE Call Waiting**
- **FREE Caller ID**
- **FREE Voice Mail**
- **Nationwide Service**

**Don't wait. Call today 866-674-6729 to see if you qualify for Wireless Lifeline Service. Sage Telecom Sales Reps are available to take your call.**

## HOW TO GET THE DEAL

**To qualify for amazing Wireless Lifeline Service, all you have to do is participate in one of the following:**

- Medicaid
- Federal Public Housing Assistance (Section 8)
- Health Benefit Coverage under the Children's Health Insurance Plan (CHIP)
- Low Income Housing Energy Assistance (LIHEAP)
- Food Stamps or Supplemental Nutrition Assistance Program (SNAP)
- Supplemental Security Income (SSI)
- National School Lunch Program (NSLP)
- Temporary Assistance for Needy Families (TANF)
- Tribal TANF
- Bureau of Indian Affairs General Assistance
- Head Start Income Eligible (Tribal Only)
- Food Distribution Program on Indian Reservations (FDPIR)

**You may also qualify if your total household income is at or below the Federal Poverty Guideline.**

\*Lifeline is a government assistance program, the service, is non-transferable, only eligible consumers may enroll in the program, and the program is limited to one discount per household. Any person who knowingly makes false statements in order to obtain Lifeline service will be subject to fines or imprisonment or can be barred from the program. 500 minutes can be for either talk or text. Monthly standard rate of \$24.25 will apply until you are certified. Discounted monthly rate of \$15.00 will start upon approval of Federal Lifeline. Payment plans are available for the \$25.00 activation fee that includes selection of a basic mobile phone which is activated and provided ready for use. Mobile phone may be data enabled.

**EXHIBIT 4**

**Sample Advertisement**



# Lifeline Phone Service

## Lifeline Plus

If you qualify for the Lifeline Program, you can receive a \$10 discount on any Pay As You Go Monthly Plans

INCLUDED WITH FREE LIFELINE SERVICE	MONTHLY	TALK & TEXT	DATA	INT'L TALK	
<b>750 Minutes</b>	<b>\$25</b> /mo	Unlimited	<b>3 GB</b>	<b>Unlimited</b> Mexico, China, & Canada	
<b>Unlimited Text</b>	<b>\$35</b> /mo	Unlimited	<b>5 GB</b>	<b>Unlimited</b> Mexico, China, & Canada	
<b>1 GB of Data</b>	<b>Add-Ons</b>				
<b>Unlimited Int'l Talk</b> to Mexico, China, & Canada	INTERNATIONAL MONTHLY PLANS		VOICE OR DATA REFILLS		
	<b>\$5</b> /mo.	Unlimited to 55+ countries	<b>\$5</b>	<b>500 MINUTES</b>	<b>500 MB</b>
	Unlimited calling to the first ten unique numbers each month. Expires in 30 days.		<b>\$10</b>	<b>1000 MINUTES</b>	<b>1 GB</b>
		All refills expire after 30 days.			
		INTERNATIONAL REFILL	INTERNATIONAL RATES		

**All Plans Include:** Voicemail, Caller ID, 3-Way Calling. Unlimited Text to 80+ countries, and up to 3G speeds.

## Free Lifeline Phone Service

### Sign Up Today!



Visit us at [www.truconnect.com](http://www.truconnect.com)



Call us at **800.430.0443**

### Follow us for Updates & Specials!



@TruConnect



@TruConnect



@TruConnect\_LA

Add more Int'l minutes anytime for just **\$5**.

International Refills will expire in 30 days & are charged per minute.

#### International Service

Int'l calls are charged at the applicable rate plus airtime. Advertised int'l rates do not apply to calls made to foreign mobile phones unless specified or to off network/special locations and in some instances may be higher.

A full list of rates can be found at [www.truconnect.com/international](http://www.truconnect.com/international) and are subject to change. The provider for TruConnect international calls is Elite Telecom. For full terms and conditions, go to: [www.truconnect.com/legal-terms-and-conditions-personal/](http://www.truconnect.com/legal-terms-and-conditions-personal/).





## TruConnect Exclusives



### WHAT IS THE WEFI APP?

Everyone loves a good Wi-Fi connection these days. It's free and saves you from using loads of data each month.

But it's never simple — which connection is the fastest? Which is the safest?

That's where we come in.

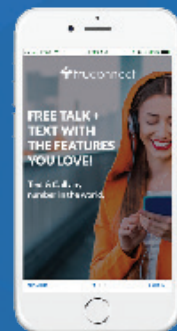
The Wefi app will automatically locate and instantly connect to the strongest Wi-Fi network available.

All of the 200+ million Wi-Fi hotspots in our database were discovered by someone like you — join our network and help us connect the world.



Everything you love about your wireless plan is now available in one easy-to-use app.

- Unlimited texts in the U.S. and Canada
- FREE global texts to any TruText, Textplus, or Nextplus user
- Unlimited Wi-Fi calling
- Send your friends fun gifs and stickers
- A unique phone number for the area code of your choice
- Earn free calling credits by watching videos



## Lifeline Program

### What is the Pennsylvania Lifeline Program?

This is a Lifeline service brought to you by TruConnect. Lifeline is a government assistance program. The service is non-transferable and only eligible consumers may enroll. Only one Lifeline service is allowed per household. TruConnect provides free Unlimited Text, 750 minutes + 1GB of data to qualified low-income customers. If you qualify, you will also have unlimited access to 911 and customer service. To keep your service active, you must use it at least once every 30 days.

### How Do I Qualify?

You may qualify for the Pennsylvania Lifeline program if you, a dependent, or your household is enrolled in certain government programs or if your household income is at or below certain income limits. Apply in person with an Authorized Dealer, online, or by calling customer service. All of TruConnect's Lifeline Plans have the following features:

- Free customer service calls
- Free voicemail, caller ID, and call waiting
- Free 911 and balance inquiry calls

### Documents Required to Apply

- Government-Issued Picture ID (Full name, DOB, not expired)
- Proof of Eligibility (Program card, participation letter, or income proof)
- Proof of Address (May be required)
- Social Security Number (Last 4 digits)

### For Additional Information Contact

TruConnect Customer Service: 611 or visit [www.truconnect.com/lifeline](http://www.truconnect.com/lifeline)

Lifeline Program: 866.272.0357 or visit [www.lifelinesupport.org](http://www.lifelinesupport.org)

## Lifeline Eligibility

### Method 1 Program-Based Eligibility

You may qualify for the Lifeline discount if you OR another member of your household is currently enrolled in any one of the following public assistance programs:

- Supplemental Nutrition Assistance Program (SNAP/Food Stamps/Food Assistance)
- Medicaid (not Medicare)
- Supplemental Security Income (SSI)\*
- Federal Public Housing Assistance (FPHA)
- Veterans Pension or Survivors Pension Benefit

\*Social Security benefits and/or Social Security Disability benefits are not program-based eligibility qualifiers. Social Security and/or Social Security Disability income may only be used to qualify for Lifeline Program participation under the income-based eligibility method.

Household Size	Annual Income Limits
1	\$16,389
2	\$22,221
3	\$28,053
4	\$33,885
5	\$39,717
6	\$44,549
7	\$51,381
8	\$57,213
Additional Member	Add \$5,832

(Effective 1/1/18-12/31/18)

## Lifeline Service

### Monthly Plans & Data Refills

Monthly Plans expire after 30 days. If you add a Monthly Plan before your current Monthly Plan expires, your new Monthly Plan will replace your current Monthly Plan.

The data from your Monthly Plan expires after 30 days. A Data Refill is separate from the data included in your Monthly Plan, and your refill will be used after the data in your Monthly Plan. Data Refills cannot be used unless you are on a current Monthly Plan.

### Lifeline Service

Comprehensive terms and conditions for the TruConnect Lifeline Plans are available at [www.truconnect.com](http://www.truconnect.com). All terms and conditions of service as described herein apply to services provided under the Lifeline Plans. Lifeline is a government assistance program, and Lifeline service is non-transferable. Only eligible consumers may enroll, and the program is limited to one discount per household. You acknowledge and agree that TruConnect may modify or terminate its Lifeline services in the event that there are any changes to the applicable governmental programs and subsidies, upon prior notice to you if/as required by state and federal regulations. The Lifeline Administrator will determine whether or not you are eligible for Lifeline. Proof of eligibility is required such as an eligible program card or statement of benefits. TruConnect will notify you when your Lifeline application has been approved. You understand that by signing up for a Lifeline Plan with TruConnect, you may not have a Lifeline plan with any other carrier (wireless or landline), and you further agree to comply with any documentation or verification procedure necessary to confirm that you qualify for the Lifeline Program. If you are no longer eligible for Lifeline, TruConnect may terminate your account. If you misrepresent your eligibility for Lifeline, you agree to pay us the additional amount you would have been charged under the most favorable rate plan for which you are eligible. To remain qualified for Lifeline, you must successfully complete an annual renewal form. If you fail to complete the annual renewal by the required date, you will be de-enrolled from the TruConnect Lifeline services. Your TruConnect Lifeline service handset is non-transferable. You agree not to give away, resell, or offer to resell your Lifeline service. Removing the handset from the home may prevent other household members from making and receiving calls. Coverage limitations, including service interruptions due to terrain, signal strength, and weather, may affect the ability to make or receive calls, including calls to 911 in the event of an emergency. In the event that you breach these Terms & Conditions, TruConnect reserves the right to immediately de-enroll you from the TruConnect Lifeline services. Unresolved questions or complaints regarding Lifeline service may be directed to the PA Public Utilities Commission, Bureau of Consumer Services, P.O. Box 3265, Harrisburg, PA 17105-3265 or call 1-717-783-1740 or toll free 1-800-692-7380.

# Free Lifeline Phone Service

**EXHIBIT 5**

**Coverage Area**

## TRUCONNECT COVERED ZIP CODES - UTAH

84001	84051	84095	84147	84331	84604	84737
84003	84052	84096	84148	84332	84605	84738
84004	84053	84097	84150	84333	84606	84739
84005	84054	84098	84151	84334	84620	84741
84006	84055	84101	84152	84335	84621	84742
84007	84056	84102	84157	84336	84622	84745
84008	84057	84103	84158	84337	84624	84746
84009	84058	84104	84165	84338	84626	84751
84010	84059	84105	84170	84339	84628	84753
84011	84060	84106	84171	84340	84630	84754
84013	84061	84107	84180	84341	84631	84757
84014	84062	84108	84184	84401	84633	84757
84015	84063	84109	84189	84402	84634	84759
84016	84064	84110	84190	84403	84636	84760
84017	84065	84111	84199	84404	84639	84761
84018	84066	84112	84201	84405	84642	84763
84020	84067	84113	84244	84407	84644	84764
84021	84068	84114	84302	84408	84645	84765
84022	84069	84115	84304	84409	84648	84766
84023	84070	84116	84305	84412	84651	84767
84024	84071	84117	84306	84414	84652	84770
84025	84072	84118	84307	84415	84653	84771
84026	84073	84119	84308	84501	84654	84772
84027	84074	84120	84309	84513	84655	84774
84028	84075	84121	84310	84515	84656	84780
84029	84076	84122	84311	84516	84657	84781
84032	84078	84123	84312	84518	84660	84782
84033	84079	84124	84313	84520	84663	84783
84035	84080	84125	84314	84521	84664	84790
84036	84081	84126	84315	84522	84701	84791
84037	84082	84127	84317	84523	84710	
84038	84083	84128	84318	84525	84711	
84039	84084	84129	84319	84526	84712	
84040	84085	84130	84320	84528	84713	
84041	84086	84131	84321	84532	84714	
84042	84087	84132	84322	84535	84720	
84043	84088	84133	84323	84537	84721	
84044	84089	84134	84324	84539	84722	
84045	84090	84138	84325	84540	84724	
84046	84091	84139	84326	84542	84725	
84047	84092	84141	84327	84601	84726	
84049	84093	84143	84328	84602	84730	
84050	84094	84145	84330	84603	84731	

CLLI	RATE CENTER	COMPANY NAME
ALMTUTXC	ALTAMONT	UBTA-UBET COMMUNICATIONS, INC. DBA STRATA NETWORKS
ALTAUTMA	ALTA	QWEST CORPORATION
AMFKUTMA	AMERCNFORK	QWEST CORPORATION
ANTMUTXC	ANTIMONY	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC.
APVYUTXC	APPLE VLLY	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC.
BEVRUTMA	BEAVER	QWEST CORPORATION
BGCYUTMA	BRIGHAM CY	QWEST CORPORATION
BLNGUTXE	NAT BRIDGE	CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT
BNTFUTMA	BOUNTIFUL	QWEST CORPORATION
BRCNUTXC	BRYCECNYON	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC.
BRCYUTXC	BEARRIV CY	CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT
BRYLUTAA	BERYL	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC.
CDCYUT08	CEDAR CITY	BEEHIVE TEL CO - UT
CDCYUTMA	CEDAR CITY	QWEST CORPORATION
CHMWUTXC	CHRISTMMDW	UNION TELEPHONE CO. - WY
CLFDUTMA	CLEARFIELD	QWEST CORPORATION
CRNNUTMA	BRIGHAM CY	QWEST CORPORATION
CSDLUTXC	CASTLEDALE	EMERY TELEPHONE DBA EMERY TELECOM
CSDLUTXC	GREENRIVER	EMERY TELEPHONE DBA EMERY TELECOM
CTWDUTMA	MIDVALE	QWEST CORPORATION
DCHSUTMA	DUCHESNE	UBTA-UBET COMMUNICATIONS, INC. DBA STRATA NETWORKS
DELTUTXC	DELTA	CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT
DGWYUTMA	DUGWAY	SKYLINE TELECOM
DRPRUTMA	MIDVALE	QWEST CORPORATION
DTJHUTXC	DUTCH JOHN	UNION TELEPHONE CO. - WY
ECRCUTMA	PRICE	CARBON/EMERY TELECOM, INC. - UT
EGMTUTAA	EAGLE MTN	DIRECT COMMUNICATION CEDAR VALLEY, LLC
ENTRUTXC	ENTERPRISE	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC.
ESCLUTXC	ESCALANTE	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC.
EURKUTXC	EUREKA	SKYLINE TELECOM
FDNGUTXC	FIELDING	CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT
FLMRUTXC	FILLMORE	CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT
FRLDUTXC	FRUITLAND	UBTA-UBET COMMUNICATIONS, INC. DBA STRATA NETWORKS
FRTNUTMA	FARMINGTON	QWEST CORPORATION
FRVWUTXC	SOLDER SMT	CENTRAL UTAH TELEPHONE, INC.
FRVWUTXC	SPNSFKCNYN	CENTRAL UTAH TELEPHONE, INC.
FTBTUTXC	FLATTOP	UBTA-UBET COMMUNICATIONS, INC. DBA STRATA NETWORKS
GNDLUTXC	GREENDALE	UNION TELEPHONE CO. - WY
GNSNUTXC	GUNNISON	GUNNISON TELEPHONE CO.
GRCKUTXC	GROUSE CRK	BEEHIVE TEL CO - UT
GRCYUTXC	GARDENCITY	BEAR LAKE COMMUNICATIONS
GSHNUTXC	GOSHEN	SKYLINE TELECOM
GTVLUTMA	TOOELE	QWEST CORPORATION
HBCYUTMA	HEBER CITY	QWEST CORPORATION
HLDNUTXC	HOLDEN	CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT
HLDYUTMA	MIDVALE	QWEST CORPORATION

CLLI	RATE CENTER	COMPANY NAME
HLPRUTMA	PRICE	CARBON/EMERY TELECOM, INC. - UT
HNVIUTMA	OGDEN	QWEST CORPORATION
HOWLUTXC	PROMONTORY	CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT
HRCNUTMA	ST GEORGE	QWEST CORPORATION
HYRMUTMA	LOGAN	QWEST CORPORATION
KAMSUTXC	COALVILLE	ALL WEST COMMUNICATIONS, INC. - UTAH
KAMSUTXC	JORDANELLE	ALL WEST COMMUNICATIONS, INC. - UTAH
KAMSUTXC	TIMBERLAKE	ALL WEST COMMUNICATIONS, INC. - UTAH
KAMSUTXC	KAMAS	ALL WEST COMMUNICATIONS, INC. - UTAH
KAMSUTXC	RANDOLPH	ALL WEST COMMUNICATIONS, INC. - UTAH
KANBUTXC	KANAB	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC.
KRNSUTMA	MIDVALE	QWEST CORPORATION
KYVLUTMA	KAYSVILLE	QWEST CORPORATION
LAPNUTXC	LAPOINT	UBTA-UBET COMMUNICATIONS, INC. DBA STRATA NETWORKS
LEDSUTMA	ST GEORGE	QWEST CORPORATION
LEHIUTMA	LEHI	QWEST CORPORATION
LOGNUTMA	LOGAN	QWEST CORPORATION
LYTNUTMA	CLEARFIELD	QWEST CORPORATION
MAGNUTNM	MIDVALE	QWEST CORPORATION
MANLUTXC	MANILA	UNION TELEPHONE CO. - WY
MANTUTXC	MANTI	MANTI TELEPHONE CO.
MDVAUTMA	MIDVALE	QWEST CORPORATION
MEDWUTXC	MEADOW	CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT
MLFRUTXC	MILFORD	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC.
MNTIUTXC	MONTICELLO	CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT
MOABUTXC	MOAB	CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT
MONRUTMA	MONROE	QWEST CORPORATION
MRGNUTMA	MORGAN	QWEST CORPORATION
MRRYUTMA	MURRAY	QWEST CORPORATION
MTGNUTMA	MORGAN	QWEST CORPORATION
NEOLUTXC	NEOLA	UBTA-UBET COMMUNICATIONS, INC. DBA STRATA NETWORKS
NEPHUTMA	NEPHI	QWEST CORPORATION
NSLKUTMA	BOUNTIFUL	QWEST CORPORATION
OGDNUTMA	OGDEN	QWEST CORPORATION
OGDNUTNO	OGDEN	QWEST CORPORATION
OGDNUTSO	OGDEN	QWEST CORPORATION
OGDNUTWE	OGDEN	QWEST CORPORATION
OREMUTMA	PROVO	QWEST CORPORATION
ORVLUTXC	ORDERVILLE	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC.
PAGEAZMA	GLNCNYONCY	QWEST CORPORATION
PLGVUTMA	PLEASATGRV	QWEST CORPORATION
PNGTUTXC	BEAVER	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC.
PNGTUTXC	ST GEORGE	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC.
PNGTUTXC	CEDAR CITY	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC.
PNGTUTXC	PANGUITCH	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC.
PRCYUTMA	PARK CITY	QWEST CORPORATION

CLLI	RATE CENTER	COMPANY NAME
PRICUTMA	PRICE	CARBON/EMERY TELECOM, INC. - UT
PROVUTMA	PROVO	QWEST CORPORATION
PRTGUTXC	PORTAGE	CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT
PRTNUTXC	PARTOUN	BEEHIVE TEL CO - UT
PRWNUTMA	PAROWAN	QWEST CORPORATION
PYSNUTMA	PAYSON	QWEST CORPORATION
RCFDUTMA	RICHFIELD	QWEST CORPORATION
RCMDUTMA	LOGAN	QWEST CORPORATION
RNDTUTXC	RANDLETT	UBTA-UBET COMMUNICATIONS, INC. DBA STRATA NETWORKS
ROY UTMA	CLEARFIELD	QWEST CORPORATION
RSVTUTMA	ROOSEVELT	UBTA-UBET COMMUNICATIONS, INC. DBA STRATA NETWORKS
RSVYUTXC	RUSHVALLEY	BEEHIVE TEL CO - UT
RVTNUTMA	MIDVALE	QWEST CORPORATION
SALMUTMA	SPANIHFORK	QWEST CORPORATION
SALNUTMA	SALINA	QWEST CORPORATION
SCFDUTXC	SCOFIELD	CENTRAL UTAH TELEPHONE, INC.
SCIPUTXC	SCPIO	CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT
SLKCUTEA	SALT LAKE	QWEST CORPORATION
SLKCUTMA	SALT LAKE	QWEST CORPORATION
SLKCUTSO	SALT LAKE	QWEST CORPORATION
SLKCUTWE	SALT LAKE	QWEST CORPORATION
SMFDUTMA	LOGAN	QWEST CORPORATION
SNTQUTMA	PAYSON	QWEST CORPORATION
SNVLUTXC	SNOWVILLE	CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT
SPDLUTMA	ST GEORGE	QWEST CORPORATION
SPFKUTMA	SPANIHFORK	QWEST CORPORATION
SPVLUTMA	SPRINGVL	QWEST CORPORATION
STGRUTMA	ST GEORGE	QWEST CORPORATION
TABNUTXC	TABIONA	UBTA-UBET COMMUNICATIONS, INC. DBA STRATA NETWORKS
THSNUTXC	THOMPSON	CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT
THTCUTXC	THATCHER	CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT
TOOLUTMA	TOOELE	QWEST CORPORATION
TRMNUTXC	TREMONTON	CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT
VERNUTXC	VERNON	BEEHIVE TEL CO - UT
VEYOUTMA	ST GEORGE	QWEST CORPORATION
VRNLUTMA	FLATTOP	UBTA-UBET COMMUNICATIONS, INC. DBA STRATA NETWORKS
VRNLUTMA	VERNAL	UBTA-UBET COMMUNICATIONS, INC. DBA STRATA NETWORKS
WASHUTMA	ST GEORGE	QWEST CORPORATION
WJRDUTMA	MIDVALE	QWEST CORPORATION
WNDVUTMA	WENDOVER	SKYLINE TELECOM

**EXHIBIT 6**

**Key Management Bios**

**Sage Telecom Communications, LLC d/b/a TruConnect**  
**Executive Bios**

**Nathan R. Johnson, Co-Chief Executive Officer**

Nathan R. Johnson is Executive Chairman of the Board and an investor in Sage Telecom Communications, LLC d/b/a TruConnect, where he oversees the strategic vision and effective governance of the organization. Mr. Johnson is also a Managing Partner of Gemini Partners, a middle market investment bank, where he has financed, sold, and advised several small and middle market telecommunications companies including Telemac, Distributive Networks, and Pulse Entertainment, among others. Prior to Gemini Partners, Mr. Johnson served as Vice President in investment banking at Deutsche Bank, where he advised several Latin American companies including Telefonos de Peru and a Venezuelan phone company in their efforts to take the companies private. Mr. Johnson received his MBA from the Wharton School at the University of Pennsylvania with a concentration in Finance and Multinational Management. He also received his MA from the University of Pennsylvania with concentrations in Latin America and Spanish.

**Matthew H. Johnson, Co-Chief Executive Officer**

Matthew Johnson is a Board Member and investor of Sage Telecom Communications, LLC d/b/a TruConnect as well as Managing Partner of Gemini Partners. At Gemini Partners, a middle market investment bank, Mr. Johnson has financed, sold, and advised several small and middle market telecommunications companies including Telemac, Distributive Networks and Pulse Entertainment, among others. Previously, Mr. Johnson was a Vice President in Investment banking at Credit Suisse First Boston where he financed numerous telecommunications companies specifically located in Latin America, including Bestel Communications, a company that operated fiber loops stretching from the US to Mexico, and Globopar, a telecommunications and media conglomerate based in Brazil. Mr. Johnson holds an MBA from Northwestern University's Kellogg School of Management.

**David Wilder, Chief Financial Officer**

David Wilder is a CPA with over 30 years of broad industry experience that has included extensive financial as well as operational responsibilities. David has held positions as President/CFO/Controller with a variety of public and privately held companies in varying industries. They included both US and international assignments.

David's initial professional experience out of college was as a CPA with Deloitte & Touche, 5 years, and Arthur Andersen, 2 years. David left Deloitte & Touche in December of 1988 as a Manager working in the Emerging Business Group. David graduated from the University of Southern California with a degree in Business Administration.



**Lucy Sung, General Manager, Global Operations**

Ms. Sung is the General Manager of Global Operations for Sage Telecom Communications, LLC d/b/a TruConnect and leads the Legal, Compliance, Customer Care, Sales Operations, Human Resources, and Billing Operations teams. She has over 30 years of experience in the wireless carrier industry, and has 15 years of experience managing the operations and expansion of wireless ETCs. She has held senior management positions in companies that include AT&T and others. Ms. Sung holds a Bachelor of Science Degree in Business Administration.

**Danielle Perry, Chief Information Officer**

Danielle Perry is the Chief Information Officer for Sage Telecom Communications, LLC d/b/a TruConnect and responsible for leading all technology-related aspects of the business, from software development to data analytics. Ms. Perry has over 20 years of experience in the telecommunications field, with 8 of those years being focused on Lifeline. In her previous position she was the Chief Information Officer at Blue Jay Wireless.