



Marisa Desautel
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March 1, 2021

VIA ELECTRONIC MAIL

Department Secretary
Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, MA 02118

RE: TRUCONNECT COMMUNICATIONS, INC.

Dear Secretary Green,

On behalf of TruConnect Communications, Inc. ("TruConnect"), attached for filing in the above captioned docket are TruConnect's Responses to the Department of Telecommunications and Cable First Set of Information Requests and a Motion for Protection Treatment of Confidential Information. This filing includes the public version of Response to D.T.C. 1-3 which has been redacted. The confidential unredacted version shall be submitted upon granting of the attached Motion.

If you have any questions or if I may provide you with additional information regarding this filing, please do not hesitate to contact me. Thank you.

Respectfully,

Marisa Desautel, Esq.
Desautel Law
38 Bellevue Avenue, Suite H
Newport, RI 02840
Tel: (401) 477-0023

Enclosures

**BEFORE THE
MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

Petition of TruConnect Communications, Inc. for)	
Designation as an Eligible Telecommunications)	D.T.C. 20-2
Carrier)	

MOTION FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION

Pursuant to Pursuant to G.L. c. 25C, § 5 and 207 CMR 1.04(5)(e), TruConnect Communications, Inc. hereafter ("TruConnect" or the "Company") hereby moves the Department of Telecommunications and Cable ("the Department") to grant this motion to protect from public disclosure certain confidential, competitively sensitive, and proprietary information provided in this proceeding involving the Department's issuance of the First Set of Information Requests dated February 4, 2021 ("Information Request"). Specifically, TruConnect requests that confidentiality be afforded to its response to D.T.C. 1-3, Exhibit 1, of the Information Request which contains audited financial statements of the Company and non-Lifeline subscriber numbers (the "Protected Information"). As grounds for this request, the Company states that the Protected Information is confidential, competitively sensitive, and proprietary information and as a result the Department is authorized to protect it from public disclosure in accordance with G.L. c. 25C, § 5.

I. LEGAL STANDARD

Confidential Information may be protected from public disclosure in accordance with Mass. Gen. Laws ch. 25C § 5 which provides in part:

"[T]he department may protect from public disclosure trade secrets, confidential, competitively sensitive or other proprietary information provided in the course of proceedings conducted pursuant to this chapter. There shall be a presumption that the information for which such protection is sought is public information and the burden shall be upon the proponent of such protection to prove the need for such

protection. Where such a need has been found to exist, the department shall protect only so much of the information as is necessary to meet such need.”

The Department has previously recognized that certain categories of materials that are considered competitively sensitive information and given confidential treatment include corporate financial information of private companies and total wireless subscriber count. *See D.T.C. 11-11 Hearing Officer Ruling on Motion for Protective Treatment at 10-11 (November 26, 2012)*. The number of non-Lifeline subscribers is considered by TruConnect to be proprietary and commercially sensitive information and not otherwise publicly made available (unlike Lifeline subscriber numbers than can be searched for on the Universal Service Administrative Company (“USAC”) website).

II. ARGUMENT

The Department has established a three-part standard for determining whether, and to what extent, information submitted by a party in a Department proceeding may be protected from public disclosure under G.L. c. 25C, § 5. First, the information for which protection is sought must constitute the type of information that can be exempted from public disclosure such as trade secrets, confidential or competitively sensitive or other proprietary information. Here, the information requested by the Department in D.T.C. 1-3 concerning “specific metrics demonstrating the financial health of TruConnect and its affiliates such as subscriber counts, financial statements, balance sheets, etc.” is considered by TruConnect to be confidential, proprietary, and commercially sensitive information. TruConnect is a privately held company and financial records and subscriber numbers are not otherwise publicly available. The Protected Information is only made available to a limited number of TruConnect personnel, and the Company employs its best efforts to maintain the secrecy of the Protected Information. Non-Lifeline subscriber numbers are not publicly available

and making public could allow competitors an unfair to marketing advantage and use those efforts against TruConnect and could provide its competitors with unique insight into the Company's business model.

Second, the party seeking protective treatment must overcome the statutory presumption that the material is public in nature and "prove" the need for non-disclosure. As stated above, the Protected Information is not publicly available and is safeguarded by the Company, and only known to a limited number of employees, due to its confidential nature.

Third and finally, where the need for protective treatment has been established, the Department may limit the time period of the non-disclosure and the Department may only protect the portion of the information as is deemed necessary to meet the established need. TruConnect is not requesting a blanket assertion of confidentiality but rather has limited its request to the response to D.T.C. 1-3, which contains audited financial statements and non-Lifeline subscriber counts of the Company. TruConnect requests that the Protected Information be kept confidential for a minimum period of seven years with the opportunity to renew its request for confidential treatment at the end of the seven-year period based upon a showing of a need for continuing protection.

III. CONCLUSION

WHEREFORE, for the reasons stated herein, TruConnect requests that the Department grant TruConnect's Motion for Protective Treatment of Confidential Information with respect to the Protected Information contained in its Response to D.T.C. 1-3 for a period of at least seven years with the opportunity to renew the request for confidential treatment upon a showing of need for continuing protection.

Respectfully submitted,

s/ Lance J.M. Steinhart

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and

s/ Marisa Desautel

Marisa Desautel, Esq.
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Desautel Law
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E-Mail: marisa@desautelesq.com
Attorneys for TruConnect Communications, Inc.

Dated: March 1, 2021

**RESPONSES TO FIRST SET OF INFORMATION REQUESTS BY THE
DEPARTMENT OF TELECOMMUNICATIONS AND
CABLE TO TRUCONNECT COMMUNICATIONS, INC.
D.T.C. 20-2
Dated February 4, 2021**

D.T.C. 1-1 Please provide a complete and detailed list of each of TruConnect's affiliates and provide the names under which each does business.

Response: **TSC Acquisition Corporation (Parent Company)**
 Sage Telecom, Inc.
 Sage Telecom Communications, LLC d/b/a TruConnect
 TSC Marketing LLC
 TruConnect Mobile LLC

Response prepared by: Tank Menzies, Legal Counsel, TruConnect

**RESPONSES TO FIRST SET OF INFORMATION REQUESTS BY THE
DEPARTMENT OF TELECOMMUNICATIONS AND
CABLE TO TRUCONNECT COMMUNICATIONS, INC.
D.T.C. 20-2
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D.T.C. 1-2 On pages three and four of its Petition, TruConnect identifies the states in which it and an affiliate had pending ETC petitions as of the date of the Petition. Please provide an update on the status of the referenced petitions.

Response: Since filing the Petition on May 20, 2020, TruConnect was designated as a wireless ETC in New Jersey (approved November 18, 2020), Rhode Island (approved July 23, 2020), and Vermont (approved October 14, 2020). Additionally, Sage d/b/a TruConnect was designated as a wireless ETC in Hawaii (approved on October 28, 2020).

TruConnect's application for ETC designation remain pending with the state public utility commission in Oregon and, under Sage d/b/a TruConnect in New Mexico and with the FCC.

TruConnect's Petition indicated that it had a petition for ETC designation pending in Florida. In a Memorandum dated, June 24, 2020 Staff recommended that the FL PUC deny the TruConnect Petition stating, "the Commission has authority to evaluate only wireline ETC applications." On July 14, 2020 TruConnect withdrew its Petition without prejudice.

Response prepared by: Alex Rasor, Sr. Director of PMO and Governance,
TruConnect

**RESPONSES TO FIRST SET OF INFORMATION REQUESTS BY THE
DEPARTMENT OF TELECOMMUNICATIONS AND
CABLE TO TRUCONNECT COMMUNICATIONS, INC.
D.T.C. 20-2
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D.T.C. 1-3 Please provide specific metrics demonstrating the financial health of TruConnect and its affiliates such as subscriber counts, financial statements, balance sheets, etc. with respect to both Lifeline and non-Lifeline businesses in Massachusetts and nationally. Please provide any data (e.g., graphs) that demonstrates the connection between the cash flow of TruConnect and the company's offering of Lifeline service.

Response: **As of January 31, 2021, TruConnect had 707,349 active Lifeline subscribers; a 75% increase (increase due to online marketing strategies and the roll out of Lifeline in several states in 2020). TruConnect does not have any Lifeline subscribers in Massachusetts.**

[BEGIN REDACTED CONFIDENTIAL INFORMATION]

**Response prepared by: Peter Roman, Chief Financial Officer,
TruConnect**

**RESPONSES TO FIRST SET OF INFORMATION REQUESTS BY THE
DEPARTMENT OF TELECOMMUNICATIONS AND
CABLE TO TRUCONNECT COMMUNICATIONS, INC.**

D.T.C. 20-2

Dated February 4, 2021

D.T.C. 1-4 On page 18 of its Petition, TruConnect states that it has not been subject to enforcement actions or ETC revocation proceedings, and has never had to file for bankruptcy protection. Please confirm that this statement remains true, including actions before both state and federal government entities, and that the same is true for all affiliates of TruConnect.

Response: **This statement remains true for TruConnect and its affiliates except as explained below. Further, TruConnect has operated as a telecommunications carrier for twenty years and has never had to file for bankruptcy protection, nor have its affiliates.**

In a Memorandum dated October 18, 2017 in Docket No. 3005-TI-102, Wisconsin Commission (“WI PSC”) Staff noted concerns that TruConnect’s affiliate, Sage d/b/a TruConnect (“Sage”) 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 Sage 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 and Sage have 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 and Sage. 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, TruConnect and Sage have dedicated staff to work with these aforementioned compliance providers. Regrettably, as a result of Sage not updating its address with the WI PSC, Sage did not receive notice of the proceeding and proposed revocation of its ETC designation, and therefore Sage’s Wisconsin ETC designation was revoked effective December 19, 2017 without input from Sage. However, Sage re-filed for ETC designation in Wisconsin on March 26, 2018 which the WI PSC conditionally granted effective August 28, 2018 and remains in effect.

**Response prepared by: Alex Rasor, Sr. Director of PMO and Governance,
TruConnect**

**RESPONSES TO FIRST SET OF INFORMATION REQUESTS BY THE
DEPARTMENT OF TELECOMMUNICATIONS AND
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Dated February 4, 2021**

D.T.C. 1-5 Identify all states that have rescinded, revoked, or otherwise terminated TruConnect's ETC designation or the ETC designation of any of its affiliates. Provide complete and detailed documentation for each such state.

Response: **This is not applicable to TruConnect.**

Other than Sage's Wisconsin ETC designation being revoked in December 2017 and reinstated effective August 28, 2018, as described in Response 1-4 above, Sage has not had an ETC designation permanently or temporarily revoked, rescinded, suspended, or otherwise "terminated" in any state or jurisdiction.

**Response prepared by: Alex Rasor, Sr. Director of PMO and Governance,
TruConnect**

**RESPONSES TO FIRST SET OF INFORMATION REQUESTS BY THE
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D.T.C. 20-2
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D.T.C. 1-6 Identify all states where TruConnect or any of its affiliates has withdrawn a petition for ETC designation. Provide complete and detailed documentation for each such withdrawal.

Response: See D.T.C. 1-2 for an update on Florida. Additionally, on July 31, 2020 TruConnect filed a Petition for Declaratory Ruling and for Designation as an Eligible Telecommunications Carrier with the Commonwealth of Virginia State Corporation Commission (“VA Corporation Commission”). On December 17, 2020, the VA Corporation Commission denied TruConnect’s petition stating that the VA Corporation Commission should continue its precedent of not asserting jurisdiction over wireless providers for purposes of ETC designation. On December 22, 2020 TruConnect filed a Motion for Vacating Order and Allowing for Withdrawal of Petition which was granted by the VA Corporation Commission on December 23, 2020.

Sage has voluntarily withdrawn an application or petition for ETC designation in Iowa (refiled with additional information a few days later, ultimately approved), as well as Mississippi and New Mexico due to a business decision to pursue at a later time (Sage refiled and was approved in Mississippi and is pending in New Mexico).

Response prepared by: Alex Rasor, Sr. Director of PMO and Governance,
TruConnect

**RESPONSES TO FIRST SET OF INFORMATION REQUESTS BY THE
DEPARTMENT OF TELECOMMUNICATIONS AND
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D.T.C. 20-2
Dated February 4, 2021**

D.T.C. 1-7 Identify all ongoing litigation and any litigation within the past ten years involving TruConnect or any of its affiliates. If applicable, provide a copy of all judicial findings made in relation to such litigation.

Response: **Please see attached Exhibit 2.**

Response prepared by: Tank Menzies, Legal Counsel, TruConnect

**RESPONSES TO FIRST SET OF INFORMATION REQUESTS BY THE
DEPARTMENT OF TELECOMMUNICATIONS AND
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D.T.C. 20-2
Dated February 4, 2021**

D.T.C. 1-8 Certify whether the FCC, any state commission, or any government agency has rendered or entered a finding, conviction (including plea agreements), or civil judgment against TruConnect, its executives or senior managers, or any of its affiliates or their executives or senior managers during the last ten years. Provide a copy of any such finding, conviction, plea agreements, or civil judgment.

Response: **See Exhibit 5 for Certification.**

Response prepared by: Tank Menzies, Legal Counsel, TruConnect

**RESPONSES TO FIRST SET OF INFORMATION REQUESTS BY THE
DEPARTMENT OF TELECOMMUNICATIONS AND
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D.T.C. 20-2
Dated February 4, 2021**

D.T.C. 1-9 Please provide any documentation related to the name change from Telscape Communications, Inc. to TruConnect Communications, Inc. and please explain and provide support for whether the Compliance Plan included as Exhibit 3 is applicable to TruConnect.

Response: Attached as Exhibit 3 please find the Secretary of State Certificate of Amendment regarding the name change from Telscape Communications, Inc. (“Telscape”) to TruConnect Communications, Inc. This was a simple name change; there was no change in ownership or control or otherwise any change in entity status or structure. Therefore, the Telscape Compliance Plan is applicable to TruConnect as it is the same entity performing the services pursuant to the Telscape Compliance Plan.

Response prepared by: Alex Rasor, Sr. Director of PMO and Governance,
TruConnect

**RESPONSES TO FIRST SET OF INFORMATION REQUESTS BY THE
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D.T.C. 1-10 Please describe which telecommunications services TruConnect has offered since 1998, and whether any of these services were offered in Massachusetts.

Response: **TSC Acquisition Corporation, through its subsidiaries and affiliates, TruConnect, TSC Marketing, LLC, Sage Telecom, Inc., and TruConnect Mobile LLC (collectively the "TSC Companies"), is a mobile virtual network operator ("MVNO") that provides wireless voice, messaging, and data services focused on bringing vital wireless technology to consumers by providing affordable, flexible data solutions to telephone and internet users through prepaid wireless and Lifeline services. TruConnect developed its MVNO and began offering wireless services in May 2007. Other than customers who purchased TruConnect's internet on the go product, TruConnect has not offered Lifeline or other services in Massachusetts.**

Response prepared by: Peter Roman, Chief Financial Officer, TruConnect

**RESPONSES TO FIRST SET OF INFORMATION REQUESTS BY THE
DEPARTMENT OF TELECOMMUNICATIONS AND
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D.T.C. 20-2
Dated February 4, 2021**

D.T.C. 1-11 On page 18 of the Petition, TruConnect states that it has provided non-Lifeline wireless service since October 2012. Please indicate where TruConnect is a non-Lifeline provider, and, if not provided in response to D.T.C. 1-3, TruConnect's number of non-Lifeline subscribers.

Response: **Please see response to D.T.C. 1-3.**

**Response prepared by: Alex Rasor, Sr. Director of PMO and Governance,
TruConnect**

**RESPONSES TO FIRST SET OF INFORMATION REQUESTS BY THE
DEPARTMENT OF TELECOMMUNICATIONS AND
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D.T.C. 20-2
Dated February 4, 2021**

D.T.C. 1-12 Please describe how TruConnect plans to market its Lifeline service in Massachusetts and how TruConnect plans to distribute its SIM Cards or handsets to qualified applicants.

Response: **TruConnect will use print advertising (e.g. pamphlets), social media advertising (e.g. Facebook), and search/display advertising (e.g. Google), to raise awareness of our Lifeline program in Massachusetts.**

TruConnect utilizes the services of the United States Postal Service to mail SIM cards or devices to subscribers. The shipping tracking number is managed within TruConnect's Inventory Management System. An email notification is sent to the subscriber that the SIM card or device has been mailed. The subscriber may contact the Customer Care Center to obtain the tracking number.

Response prepared by: Edgar Navarro, Director of Supply Chain Operations, TruConnect

**RESPONSES TO FIRST SET OF INFORMATION REQUESTS BY THE
DEPARTMENT OF TELECOMMUNICATIONS AND
CABLE TO TRUCONNECT COMMUNICATIONS, INC.
D.T.C. 20-2
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D.T.C. 1-13 Please certify that TruConnect will remit the 911 surcharge to the Massachusetts State 911 Department for each of its Massachusetts Lifeline customers.

Response: **See attached Exhibit 5 for Certification.**

**Response prepared by: Alex Rasor, Sr. Director of PMO and Governance,
TruConnect**

**RESPONSES TO FIRST SET OF INFORMATION REQUESTS BY THE
DEPARTMENT OF TELECOMMUNICATIONS AND
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D.T.C. 20-2
Dated February 4, 2021**

D.T.C. 1-14 On page 21 of its Petition, TruConnect discusses a telehealth pilot under review with the California Public Utilities Commission and its intention to submit a pilot proposal to the FCC. Please a) provide an update on the status of this review; and b) provide an update as to when TruConnect plans to submit its pilot proposal to the FCC if it has not already done so.

Response: **The California Public Utilities Commission choose to move forward with another pilot proposal and did not approve TruConnect’s telehealth pilot. TruConnect remains focused on building a healthcare sales channel and currently does not have plans to initiate a pilot with the FCC.**

**Response prepared by: Alex Gudkov, Chief Technology Officer,
TruConnect**

**RESPONSES TO FIRST SET OF INFORMATION REQUESTS BY THE
DEPARTMENT OF TELECOMMUNICATIONS AND
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D.T.C. 20-2
Dated February 4, 2021**

D.T.C. 1-15 On page three of its Petition, TruConnect states that it has been using underlying carriers' networks on a wholesale basis. Please explain whether TruConnect has signed wholesale agreements with these carriers.

Response: **TruConnect has signed agreements to purchase access to the underlying wireless networks of T-Mobile (effective August 15, 2014) and Sprint (effective November 7, 2006). TruConnect does not currently have an active agreement with Verizon.**

**Response prepared by: Alex Rasor, Sr. Director of PMO and Governance,
TruConnect**

**RESPONSES TO FIRST SET OF INFORMATION REQUESTS BY THE
DEPARTMENT OF TELECOMMUNICATIONS AND
CABLE TO TRUCONNECT COMMUNICATIONS, INC.
D.T.C. 20-2
Dated February 4, 2021**

D.T.C. 1-16 Please state whether TruConnect Lifeline subscribers will receive the same network functionality as subscribers to the facilities-based providers TruConnect references.

Response: **To the best of TruConnect's knowledge its Lifeline subscribers have access to the same network functionality as customers of Sprint and T-Mobile.**

**Response prepared by: Alex Rasor, Sr. Director of PMO and Governance,
TruConnect**

**RESPONSES TO FIRST SET OF INFORMATION REQUESTS BY THE
DEPARTMENT OF TELECOMMUNICATIONS AND
CABLE TO TRUCONNECT COMMUNICATIONS, INC.
D.T.C. 20-2
Dated February 4, 2021**

D.T.C. 1-17 Please provide a granular map detailing where TruConnect can provide wireless broadband and voice service in Massachusetts and at what strength. The map should clearly show the locations where 3G, 4G, and 5G services are available, and also where TruConnect will not be able to provide service due to lack of coverage from underlying carriers.

Response: **See attached Exhibit 4.**

**Response prepared by: Alex Rasor, Sr. Director of PMO and Governance,
TruConnect**

**RESPONSES TO FIRST SET OF INFORMATION REQUESTS BY THE
DEPARTMENT OF TELECOMMUNICATIONS AND
CABLE TO TRUCONNECT COMMUNICATIONS, INC.
D.T.C. 20-2
Dated February 4, 2021**

D.T.C. 1-18 Please describe how TruConnect determines which Lifeline subscribers will be assigned to which underlying carrier's network.

Response: **TruConnect intends to primarily utilize T-Mobile's underlying wireless network. In rare cases where T-Mobile coverage is poor within the zip code area that a subscriber resides, TruConnect may utilize Sprint's services when the cell phone coverage is better (note, the FCC has approved a merger between T-Mobile and Sprint such that the two networks will combine into the "New T-Mobile" over the next few years). TruConnect does not intend to utilize Verizon's wireless network at this time.**

**Response prepared by: Alex Rasor, Sr. Director of PMO and Governance,
TruConnect**

**RESPONSES TO FIRST SET OF INFORMATION REQUESTS BY THE
DEPARTMENT OF TELECOMMUNICATIONS AND
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D.T.C. 20-2
Dated February 4, 2021**

D.T.C. 1-19 Please state whether all handsets brought by subscribers from other providers will be operational with TruConnect's service.

Response: **For new Lifeline enrollments and benefit transfers, TruConnect will validate that a subscriber's handset is operational and will work on our network. When a subscriber brings their own handset, they will be required to provide the handset's International Mobile Equipment Identifier (IMEI). TruConnect's electronic enrollment process will validate, via the IMEI, that their phone is operational and will proceed to enroll the customer in Lifeline.**

**Response prepared by: Edgar Navarro, Director of Supply Chain
Operations, TruConnect**

**RESPONSES TO FIRST SET OF INFORMATION REQUESTS BY THE
DEPARTMENT OF TELECOMMUNICATIONS AND
CABLE TO TRUCONNECT COMMUNICATIONS, INC.
D.T.C. 20-2
Dated February 4, 2021**

D.T.C. 1-20 Please explain under which circumstances newly enrolled Massachusetts Lifeline customers must purchase a device versus when TruConnect will provide a device free of charge.

Response: Newly enrolled Massachusetts Lifeline customers will receive a free SIM card for use in their existing or purchased device (see page 5-6 of Petition). TruConnect designs and manufactures its own mobile devices and offers them to subscribers at a reasonable price should the subscriber wish to purchase a device from TruConnect.

**Response prepared by: Edgar Navarro, Director of Supply Chain
Operations, TruConnect**

**RESPONSES TO FIRST SET OF INFORMATION REQUESTS BY THE
DEPARTMENT OF TELECOMMUNICATIONS AND
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D.T.C. 20-2
Dated February 4, 2021**

D.T.C. 1-21 Please state how long applicants should expect to wait between being approved for Lifeline service and receiving or activating a device on TruConnect's network.

Response: **Upon receipt of a complete and approved application, TruConnect generally ships the device/SIM card to the subscriber within 1 to 3 business days from approval. Delivery may take 5 to 8 days from the shipping date.**

Response prepared by: Edgar Navarro, Director of Supply Chain Operations,

**RESPONSES TO FIRST SET OF INFORMATION REQUESTS BY THE
DEPARTMENT OF TELECOMMUNICATIONS AND
CABLE TO TRUCONNECT COMMUNICATIONS, INC.
D.T.C. 20-2
Dated February 4, 2021**

D.T.C. 1-22 Please explain in narrative form what impact the December 1, 2020, increase in Lifeline minimum service standards had or will have on TruConnect's proposed Lifeline service offerings in Massachusetts, including but not limited to the monthly cost to subscribers.

Response: On November 16, 2020, the Federal Communications Commission ("FCC") Chairman Ajit Pai released a statement regarding changes to minimum service standards within the Lifeline program. The new minimum service standard for mobile broadband usage allowance was increased from 3 GB to 4.5 GB per month effective Tuesday, December 1, 2020. There was no corresponding increase in subsidy support for the increase in data.

The change to the federal minimum service standard increase in data, without any increase in subsidy, materially affects the economics of the Company's planned service offerings in Massachusetts, as well as other jurisdictions. Since the new minimum data requirement increased to 4.5GB, TruConnect has had to institute a customer co-payment for plans in all states except for California (where there is an additional state subsidy of \$14.85). The plans to be offered in Massachusetts are:

Lifeline Basic \$0
1,000 minutes of Voice
Unlimited Text
250MB of Data

Lifeline Plus \$15*
Unlimited Voice
Unlimited Text
4.5GB of Data

** Customers will be moved to the Basic plan any month the co-pay is not paid.*

**Response prepared by: Alex Rasor, Sr. Director of PMO and Governance,
TruConnect**

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DEPARTMENT OF TELECOMMUNICATIONS AND
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D.T.C. 20-2
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D.T.C. 1-23 Please provide the price of additional minutes and data for TruConnect's Lifeline subscribers.

Response: **Additional minutes and/or data are available for purchase at the following rates:**

\$5.00 - 500 Minutes

\$10.00 - 1000 Minutes

\$2.00 - 150 MB

\$5.00 - 500 MB

\$10.00 - 1GB

**Response prepared by: Marge M. Capiral, Senior Billing Operations
Manager, TruConnect**

EXHIBIT 1
RESPONSE TO D.T.C. 1-3

REDACTED

[CONFIDENTIAL AND PROPRIETARY]

EXHIBIT 2
RESPONSE TO D.T.C. 1-7

City of Los Angeles v. TruConnect Communications, Inc.

Los Angeles Superior Court - Case No. 19STCV04436

Hartford Underwriters Insurance Co v. TSC Acquisition Corp.

Los Angeles Superior Court - Case No. 20STCV30330

Macias v. TruConnect Communications, Inc.

Los Angeles Superior Court - Case No. BC662355

Sage Telecom Communications, Inc. v. D-Link Systems, Inc.

Los Angeles Superior Court - Case No. BC705202

Los Angeles Superior Court – Case No. BC613409

Sage Telecom, Inc. v. Zambrano, et al.

Los Angeles Superior Court – Case No. 20STCV49415

Salgado v. TruConnect, et al.

Los Angeles Federal Court – Case No. 2:16-cv-03767

Travelers Property Casualty Co. of America v. TSC Acquisition Corp.

Los Angeles Federal Court - Case No. 20STCV08626

TruConnect Communications, Inc. v. Blue Casa Telephone, LLC

Santa Barbara Superior Court – Case No. 18CV06017

TruConnect Communications, Inc. v. City of Los Angeles

Los Angeles Superior Court – Case No. 20STCV08626

TruConnect Communications, Inc. v. Clark, et al.

Los Angeles Superior Court – Case No.

TruConnect Communications, Inc. v. Maximus, Inc., et al.

San Francisco Superior Court – Case No. CGC-21-589607

TSC Acquisition Corp. v. National Union Fire Insurance Co.

Los Angeles Superior Court – Case No. BC720009

TSC Acquisition Corp. v. Travelers Property Casualty Co. of America

Los Angeles Superior Court - Case No. 20STCV08626

EXHIBIT 3
RESPONSE TO D.T.C. 1-9

Delaware

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF AMENDMENT OF "TELSCAPE COMMUNICATIONS, INC.", CHANGING ITS NAME FROM "TELSCAPE COMMUNICATIONS, INC." TO "TRUCONNECT COMMUNICATIONS, INC.", FILED IN THIS OFFICE ON THE TWENTY-FIRST DAY OF SEPTEMBER, A.D. 2015, AT 9:30 O`CLOCK A.M.

A FILED COPY OF THIS CERTIFICATE HAS BEEN FORWARDED TO THE NEW CASTLE COUNTY RECORDER OF DEEDS.



Jeffrey W. Bullock, Secretary of State

3404900 8100
SR# 20150199424

Authentication: 10143080
Date: 09-28-15

You may verify this certificate online at corp.delaware.gov/authver.shtml

**STATE OF DELAWARE
CERTIFICATE OF AMENDMENT
OF CERTIFICATE OF INCORPORATION**

The corporation organized and existing under and by virtue of the General Corporation Law of the State of Delaware does hereby certify:

FIRST: That at a meeting of the Board of Directors of
Telscape Communications, Inc.

resolutions were duly adopted setting forth a proposed amendment of the Certificate of Incorporation of said corporation, declaring said amendment to be advisable and calling a meeting of the stockholders of said corporation for consideration thereof. The resolution setting forth the proposed amendment is as follows:

RESOLVED, that the Certificate of Incorporation of this corporation be amended by changing the Article thereof numbered " First " so that, as amended, said Article shall be and read as follows:

TruConnect Communications, Inc.

SECOND: That thereafter, pursuant to resolution of its Board of Directors, a special meeting of the stockholders of said corporation was duly called and held upon notice in accordance with Section 222 of the General Corporation Law of the State of Delaware at which meeting the necessary number of shares as required by statute were voted in favor of the amendment.

THIRD: That said amendment was duly adopted in accordance with the provisions of Section 242 of the General Corporation Law of the State of Delaware.

IN WITNESS WHEREOF, said corporation has caused this certificate to be signed this 18th day of September, 2015.

By: Todd Wallace
Authorized Officer

Title: COO

Name: Todd Wallace
Print or Type

EXHIBIT 4
RESPONSE TO D.T.C. 1-17

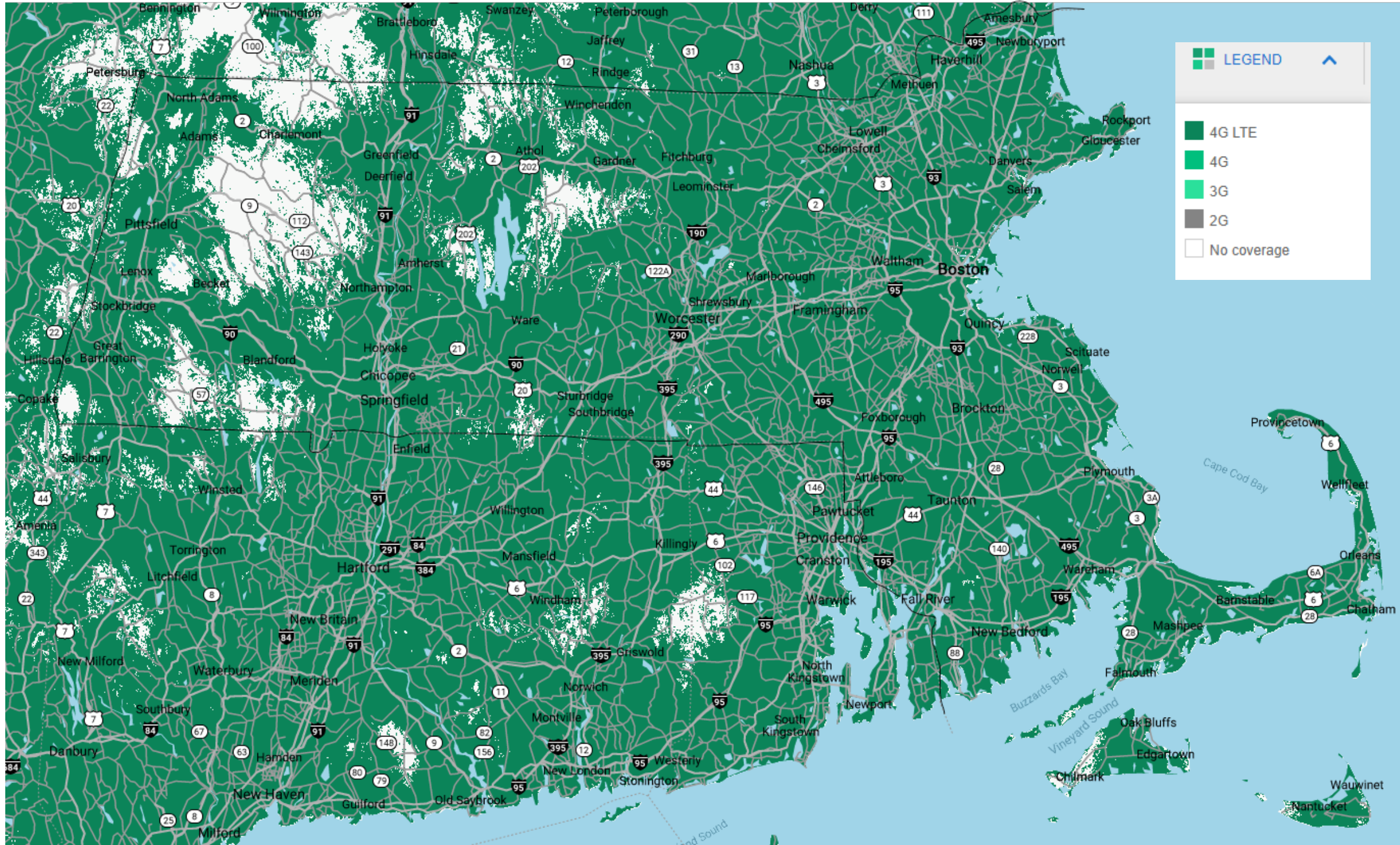


EXHIBIT 5
RESPONSES TO D.T.C. 1-8 and 1-13

CERTIFICATION

I, Nathan Johnson, hereby certify that I am the Co-CEO of TruConnect Communications, Inc. ("TruConnect") with a business address of 1149 South Hill Street, Suite 400, Los Angeles, CA 90015. I am authorized by TruConnect to make this certification on its behalf, and it is given upon my personal experience. This certification is given in support of TruConnect's Petition for Designation as an Eligible Telecommunications Provider in the Commonwealth of Massachusetts and in response to questions D.T.C. 1-8 and D.T.C. 1-13 of the First Set of Information Requests of the Department of Telecommunications and Cable.

On behalf of TruConnect I certify to the the following:

1. During the last ten years the FCC has not, nor any state commission, or any government agency has rendered or entered a finding, conviction (including plea agreements), or civil judgment against TruConnect, its executives or senior managers, or any of its affiliates or their executives or senior managers.
2. TruConnect will remit the 911 surcharge to the Massachusetts State 911 Department for each of its Massachusetts Lifeline customers.

DocuSigned by:

3287E0CD9AF948E...

Nathan Johnson, Co-CEO
TruConnect Communications, Inc.

BEFORE THE
MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Petition of TruConnect Communications, Inc. for)	
Designation as an Eligible Telecommunications)	D.T.C. 20-2
Carrier)	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing documents upon all persons in the service list compiled by the Secretary of the Department in this proceeding and all parties of record in accordance with the requirements of 207 CMR 1.05(1) (Department's Procedural Rules).

Dated at Newport, Rhode Island, this 1st day of March, 2021.

s/ Marisa Desautel

Marisa Desautel, Esq.

D.T.C. 20-2 Service List

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

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