

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of Sage	§	
Telecom Communications, LLC, for	§	
Designation as an Eligible	§	File No. TA-2014-0008
Telecommunications Carrier (ETC)	§	

**APPLICATION OF SAGE TELECOM COMMUNICATIONS, LLC FOR DESIGNATION
AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER**

COMES NOW Sage Telecom Communications, LLC (“Sage” or the “Company”), by its undersigned counsel, and files its Application requesting designation as an Eligible Telecommunications Carrier (“ETC”) pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”),¹ Federal Communications Commission (“FCC”) Rules, 47 C.F.R. §§ 54.101 *et seq.* (the “FCC Rules”),² §392.248 RSMo, and the rules and regulations of the Missouri Public Service Commission (the “Commission”) including 4 CSR 240-2.060, 4 CSR 240-3.570 and 4 CSR 240-31.060.

Sage seeks ETC status throughout the State of Missouri in the service areas of the Incumbent Local Exchange Carriers listed in **Attachment A**.

Sage seeks ETC designation solely to provide wireless Lifeline service to qualifying Missouri consumers and will not seek access to funds from the federal Universal Service Fund (“USF”) for the purpose of providing service to high cost areas. Sage does not seek support from the Missouri Universal Service Fund.

Sage shows in this Application that it meets all of the statutory and regulatory requirements for ETC designation in Missouri for the provision of Lifeline service. In addition, consumers qualifying for the Lifeline discounts offered by Sage will receive the

¹ 47 U.S.C. § 214(e)(6).

² 47 C.F.R. § 54.201 *et seq.*

benefits of mobility, as well as the high-quality and high-value services Sage offers. Designating Sage as an ETC will serve the public interest, generally, and the needs of low-income customers in Missouri, in particular.

The FCC determined that it would grant blanket forbearance from the “own facilities” requirement of Section 214(e)(1)(A) of the Act to Lifeline-only applications that comply with the conditions set forth in the FCC’s *Lifeline Reform Order*.³ Specifically, carriers seeking forbearance must submit and obtain FCC approval of a comprehensive Compliance Plan.⁴ A copy of Sage’s approved Compliance Plan is attached as **Attachment B**. Notice of the FCC Order approving Sage’s Compliance Plan is attached as **Attachment C**.⁵

Sage will comply with the FCC’s reporting requirements applicable to Lifeline-only ETCs⁶ and all applicable Missouri Commission rules.

I. COMPANY OVERVIEW

Sage is a Texas corporation having its principal place of business at 10440 N. Central Expressway, Suite 700, Dallas, Texas 75231 and its telephone number is 214-496-4700. Sage will notify the Commission of any changes to its contact information.⁷ Sage’s contact name and address are set forth below:

³ *In the Matter of Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) (“*Lifeline Reform Order*”) at ¶ 368.

⁴ See *Lifeline Reform Order* at ¶ 368.

⁵ Sage’s Compliance Plan was approved on December 26, 2012; however, since then, Sage Telecom, Inc. changed its name to Sage Telecom Communications, LLC, as reflected on Attachment D to this Application.

⁶ *Lifeline Reform Order* at ¶ 389, 47 CFR §54.422.

⁷ 4 CSR 240-3.570(3)(F).

Mr. Andrew Karl
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Please direct copies of all correspondence, pleadings and orders in this proceeding to the following:

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Sage is authorized to conduct business as a foreign limited liability company in the State of Missouri.⁸ A copy of its Certificate of Registration from the Missouri Secretary of State is attached as **Attachment D**. Sage has been in business since 1998 and is certificated by this Commission as a competitive provider of basic local exchange and interexchange telecommunications services in Missouri.⁹

The Company plans to provide wireless services through resale of the wireless services of Sprint Spectrum. Sage seeks ETC status throughout the State of Missouri in the service areas of the Incumbent Local Exchange Carriers listed in **Attachment A**.

⁸ Sage Telecom, Inc., Missouri Secretary of State, Charter No. F00494216, Entity Creation Date March 9, 2001; Sage Telecom Communications, LLC, Charter No. TL1291466, Entity Creation Date, February 13, 2013.

⁹ Case No. TA-2002-29, *Order Granting Certificate to Provide Basic Local Telecommunications Services*, issued September 13, 2001, effective September 23, 2001; Case No. TA-2002-30, *Order Approving Interexchange Certificate of Service Authority and Order Approving Tariff*, issued August 22, 2001, effective September 8, 2001.

The Company has been designated as an ETC for wireless services in Kansas, Texas and Wisconsin, and has applied for ETC status in Arkansas for the limited purpose of providing Lifeline services. Additional information about the Company is contained in Section IV. D below (Financial and Technical Qualifications).

Sage states that it does not have any outstanding Annual Reports or assessment fees owed to the Missouri Public Service Commission and it does not have any pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or customer rates, which action, judgment, or decision has occurred within three years of the date of this application.

II. SAGE'S PROPOSED ETC SERVICE OFFERING

Sage's initial planned wireless Lifeline offering will consist of prepaid plans that are available to Lifeline and non-Lifeline subscribers, with a discount applied to the monthly rate to be charged to the Lifeline subscriber. Other plans (including post-paid plans) may be offered in the future. The details of the offerings are set forth in its Compliance Plan (**Attachment B**), and reflect the new federal Lifeline subsidy support amounts available to qualified ETCs.¹⁰

Sage's wireless offerings all will have an activation fee and all plans will include the following custom calling features: Caller ID, 3-Way Calling, Call Waiting, and Voicemail. Subscribers are not bound by a local calling area requirement. All of Sage's Lifeline plans will include a minimum of 250 minutes of voice/text minutes. Sage's initial Lifeline plans are the ValuMobile Basic, ValuMobile Plus and ValuMobile Unlimited. None of Sage's plans allows roaming; none allows roll over of minutes of use.

¹⁰ See *Lifeline Reform Order* at ¶ 58 (setting a flat interim rate of \$9.25 per line per month).

Prepaid Lifeline Offering–ValuMobile Basic consists of 280 minutes of use for voice. Text messages are assessed as 3 minutes of use for each incoming message and 3 minutes of use for each outgoing message. Subscribers will not be required to sign a contract for service. The activation fee of \$30.00 includes subscriber selection of a basic handset. Subscribers can purchase extra minutes (280) with a minimum purchase of \$14.00 (lifeline rate \$4.75).

ValuMobile Plus consists of 500 minutes of use for voice. Text messages are assessed as 2 minutes of use for each incoming and 2 minutes of use for each outgoing message. Subscribers can purchase extra minutes (500) with a minimum purchase of \$25.00 (lifeline rate \$15.75). The activation fee of \$30.00 includes subscriber selection of a basic handset.

ValuMobile Unlimited consists of unlimited voice and text. Subscribers can purchase extra data minutes with a minimum purchase of \$5.00. The activation fee of \$30.00 includes subscriber selection of a basic handset.

Calls to 911 emergency services are always free, regardless of service activation or availability of minutes. Calls to Operator and Directory Assistance will be charged at a rate of \$1.50.

III. THE COMMISSION HAS JURISDICTION TO DESIGNATE SAGE AS A LIFELINE-ONLY ETC

Section 214(e)(2) of the Act authorizes state regulatory commissions to designate ETC status for purposes of receiving federal universal service support, and provides that a state commission shall designate a common carrier as an ETC if the carrier meets the requirements of Section 214(e)(1). As shown below in Section IV of this Application, Sage fulfills these requirements.

Sage seeks ETC designation for Lifeline service only; thus certain requirements contained in the Missouri Commission's rules that are applicable to ETCs seeking high-cost support are inapplicable. Sage seeks a good cause waiver of 4 CSR 240-3.570(2)(A)1-3, 4 CSR 240-.570(2)(C), 4 CSR 240-3.570(3)(C)(3) and 4 CSR 240-3.570(4), all of which requirements apply to ETCs that receive high-cost support. Sage also requests a waiver of 4 CSR 240-3.570(3)(A), for the reasons explained in Section VII. of this Application below. Pursuant to 4 CSR 240-2.060(4), Sage submits that these circumstances constitute good cause for waiver of these rules.

IV. SAGE SATISFIES THE STATUTORY AND REGULATORY REQUIREMENTS TO BE DESIGNATED AS A LIFELINE-ONLY ETC

A. Sage Offers the Services and Functionalities Supported by the Federal Low-Income Universal Service Program [47 C.F.R. § 54.101]

In its *Lifeline Reform Order* the FCC revised § 54.101 of its rules with respect to the services that will be supported. That section now reads as follows:

§ 54.101. Supported Services for rural, insular and high cost areas.

- (a) Services designated for support. Voice telephony services shall be supported by federal universal service support mechanisms. 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 systems ...; and toll limitation services to qualifying low-income consumers as described in subpart E of this part.

Sage provides each of the services supported by federal universal service support mechanisms, as set forth in §§ 54.101 *et seq.* of the FCC's new rules, and will offer these supported services in the state of Missouri upon designation as an ETC, as follows:

Voice Grade Access. Eligible voice telephony services must provide voice grade access to the public switched network or its functional equivalent. "Voice grade

access” permits a telecommunications user to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice communications, including receiving a signal that there is an incoming call. Sage will provide its customers with “voice grade access” by enabling such customers’ access to make and receive calls on the Public Switched Telephone Network (“PSTN”).

Minutes of Use for Local Service at No Additional Charge. Sage will provide its Lifeline customers with a fixed number of minutes of use for local service at no additional charge. Sage’s initial Lifeline offerings – ValuMobileBasic, ValuMobile Plus, and ValuMobile Unlimited – include, respectively, 280, 500, and unlimited minutes of voice service in the monthly charge.

Access to Emergency Services. Sage will provide access to emergency services in conformance with the FCC’s requirements. All of the phones that Sage will distribute to subscribers will be capable of delivering Automatic Numbering Information (“ANI”) and Automatic Location Information (“ALI”), and otherwise satisfy applicable Enhanced-911 requirements.

Toll Limitation. Sage will provide toll limitation services to qualifying low-income customers.

B. Scope of Sage’s ETC Designation Request

Sage seeks in this Application to be designated as an ETC to provide federal low-income Lifeline USF service to qualifying low-income consumers via wireless modality within the service areas of the ILECs listed in **Attachment A**. These service areas are referred to as the “Designated Service Area.” Sage commits to offer and provide service throughout the Designated Service Area. Upon designation as an ETC, Sage will make available Lifeline service to qualifying consumers requesting service

throughout the Designated Service Area pursuant to the requirements of the universal service program and in accordance with 47 C.F.R. § 54.202(a)(1) and 4 CSR 240-3.570.

C. Sage Will Resell Sprint Spectrum's Wireless Service to Provide Wireless Service in the Designated Service Area [47 C.F.R. § 54.201(d)]

Sage will rely on resold wireless services, which it has obtained through an agreement with Sprint Spectrum, which holds commercial mobile wireless service licenses. Sage will provide the supported services listed in the FCC's new Lifeline rules, *i.e.*, 47 C.F.R. § 54.101, including voice grade access to the PSTN; 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 its proposed ETC service area has implemented 911 or enhanced 911 systems; providing minutes of use for local service provided at no charge to end users; and the provision of toll limitation services.

D. Financial and Technical Qualifications

As part of the *Lifeline Reform Order*, the FCC amended its rules to require a carrier seeking designation as a Lifeline-only ETC to demonstrate that it is financially and technically capable of providing the supported Lifeline service in compliance with all of the low-income program rules.¹¹ Sage satisfies these criteria. An Officer's Affidavit concerning Sage's financial and technical qualifications is attached as **Attachment E**.

Sage has been in business since 1998, employing approximately 80 people. Sage is a certificated provider of competitive local exchange services in Arkansas, California, Connecticut, Illinois, Indiana, Kansas, Michigan, Missouri, Ohio, Oklahoma,

¹¹ See *Lifeline Reform Order* at ¶ 387.

Texas, and Wisconsin.¹² Sage has been designated as an ETC for wireline service in Kansas, Oklahoma, Texas, and Wisconsin. Sage has been designated as a wireless ETC in Kansas, Texas and Wisconsin. Sage 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. 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 total wireline and wireless telephone customers receive a subsidy from a low income program.

Sage has not been subject to any enforcement action at the FCC or in any state utility regulatory commission. No ETC designations held by Sage have been rescinded, revoked or terminated by the FCC, nor has any state taken such action with respect to Sage's ETC designation or its designation as eligible for support from a state universal service fund.

E. Sage's Lifeline Service Offering

Sage's initial planned Lifeline offering is described in detail in its Compliance Plan (**Attachment B**). Additional plans may also be offered in the future; Sage has committed in its Compliance Plan that all of its plans will provide a minimum of 250 minutes of local and domestic long distance voice/text usage.

V. SAGE SATISFIES THE STATUTORY AND REGULATORY PREREQUISITES FOR DESIGNATION AS AN ETC

Sage satisfies each of the statutory and regulatory prerequisites set forth in the Act, and the prerequisites contained in the FCC's and the Commission's Rules:

¹² Sage is also an authorized provider of interexchange service in Colorado, and is certificated to provide local service as a CLEC in Florida, Kentucky, Montana, Nevada, New Mexico, North Carolina, North Dakota, Oregon, South Carolina, Washington and Wyoming.

A. Sage Is a Common Carrier

Section 3(10) of the Act, 47 U.S.C. § 153(10), defines a common carrier as “any person engaged as a common carrier for hire, in interstate or foreign communications by wire or radio....” Sage offers interstate communications by radio and is a common carrier for hire.

B. Sage Will Provide the Supported Services Through Resale

Sage operates as a reseller for the supported services, purchasing them on a wholesale basis from Sprint/Nextel which is a national wireless service provider.

C. Functionalities

In addition to those requirements set forth in § 54.201 of the FCC’s rules, Sage will satisfy the FCC’s additional ETC requirements, as applicable. In particular:

1. Satisfaction of Applicable Consumer Protection and Service Quality Standards [47 C.F.R. § 54.202(a)(3)].

Sage will comply with all applicable Missouri and federal consumer protection, consumer privacy and service quality standards. As an operating CLEC in Missouri and many other states, Sage already is subject to states’ consumer protection and service quality requirements. Sage’s wireless Lifeline customers will receive the same quality service and the benefit of the same consumer protections. Sage also will certify that it will comply with the CTIA’s Consumer Code for Wireless Service as required by 4 CSR 240-3.570(2)(B); a copy of the Code is attached as **Attachment F**.

2. Ability to Remain Functional in Emergency Situations [Section 54.202(a)(2)].

Sage has significant experience with emergency preparedness and will comply with federal and Missouri Commission requirements. Sage has detailed Emergency

Action and Disaster Recovery Plans in place to respond to emergencies. In addition, Sage's agreement with Sprint Spectrum 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 Spectrum also is subject to emergency preparedness and functionality requirements established by the FCC.¹³

3. Lifeline Certification and Verification [47 C.F.R. § 54.410].

Sage will certify and verify consumer eligibility to participate in the Lifeline program in accordance with its Compliance Plan and applicable FCC and/or Commission rules. Sage's procedures for customer verification and certification, and annual recertification, are set out in detail in Sage's Compliance Plan (Attachment B) at pages 8 through 18 and are summarized in **Attachment G** to this Application.

D. Sage Will Advertise the Availability of and Charges for Its Universal Service Qualifying Offerings [47 C.F.R. § 54.201(d)(2)]

Sage will advertise the availability of the supported services, and the corresponding rates and charges, in a manner designed to inform the general public within Missouri in compliance with federal requirements and Missouri Commission rules. This advertising will occur through a combination of media channels, such as print advertisements, direct marketing, and the Internet. The Company's advertising will be targeted to low-income consumers; marketing materials will plainly and visibly make consumers aware of both the availability and price for Lifeline. An example of the marketing material used in other states is provided in **Attachment H** to this Application; similar materials will be used in Missouri after ETC designation is granted.

¹³ See *e.g.*, Sprint Spectrum Corporation Verified Filing in Compliance with 47 C.F.R. 54.209, CC Docket No. 96-45, at 6 (filed Oct. 1, 2010).

E. Sage Commits that it Will Provide Service Throughout its Proposed Designated Service Area to all Customers Making a Reasonable Request for Service

In order to be designated as an ETC, a common carrier in its application must “[c]ommit to provide service in its designated service area to all customers making a reasonable request for service and to do so “on a timely basis.”¹⁴ The carrier whose wireless services are being resold by Sage currently provides service in all of the wire centers that make up the Designated Service Area. As a result, Sage will be able to commence offering Lifeline to all qualified consumers as soon as it receives approval of its Application. Sage commits that it will provide service to any eligible customer requesting Lifeline service throughout the Designated Service Area.

VI. SAGE WILL COMPLY WITH THE LIFELINE CERTIFICATION AND VERIFICATION REQUIREMENTS

Sections 54.410 and 54.416 of the FCC’s Rules require ETCs to comply with the requirements of initial certification of eligibility and the verification of continued eligibility for participation in the Lifeline program. Sage’s procedures for customer verification and certification, and annual recertification, are set out in detail in Sage’s Compliance Plan at pages 8 through 18 and are summarized in **Attachment G** to this Application.

VII. SAGE WILL COMPLY WITH THE COMMISSION’S ETC REQUIREMENTS AND CONDITIONS IMPOSED ON OTHER WIRELESS ETCS OFFERING SIMILAR PLANS

Upon designation as a wireless ETC, Sage will comply with the Commission’s requirements set out in its rules and regulations. Pursuant to 4 CSR 240-3.570(3)(D), Sage will submit its informational filing within thirty days of receiving its ETC designation.

¹⁴ See §§ 54.202(a)(1) and 54.202(a)(1)(A).

Pursuant to 4 CSR 240-3.570(3)(E), Sage will maintain a record of customer complaints that have been received by the company in a manner that, at a minimum includes: the end-user name; the account number; a description of the complaint; the date the complaint was filed; the resolution; and the amount of refund or credit, if any. Sage also will maintain a record of complaints from consumers in its Designated Service Area that have been submitted to the FCC and of which Sage has knowledge that, at a minimum includes: a description of the complaint; the date the complaint was filed; the date the complaint was resolved; the resolution of the complaint and the amount of refund or credit, if any.

Pursuant to 4 CSR 240-3.570(3)(B), Sage will provide customer service contact information online.

Sage's initial Lifeline offering will be a prepaid offering; therefore, Sage will not issue monthly bills/statements to its Lifeline customers. Sage requests a good cause waiver of 4 CSR 240-3.570(3)(A) requiring an ETC to develop a bill design that can be easily interpreted by its customers and sets forth charges in compliance with state and federal billing requirements.

VIII. SAGE WILL MEET ALL ADDITIONAL MISSOURI PSC REQUIREMENTS FOR ETCs

Sage will comply with all Missouri Public Service Commission rules and regulations governing Eligible Telecommunications Carriers (ETCs). In anticipation of new Commission rules, Sage states the following:

A. Sage certifies that all Universal Service Fund funding will flow through to the subscriber of the applicable program.

B. Sage will only offer Lifeline service under the name “Sage Telecom Communications, LLC.”

C. Sage will comply with all requirements associated with the Lifeline program contained in 47 CFR Part 54 Subpart E.

D. Sage will comply with all requirements of the Missouri Public Service Commission rules and regulations, whether funded solely through the Federal Universal Service Fund (FUSF) or through the FUSF and the MoUSF.

E. Sage does not intend to seek support from the MoUSF.

F. Sage will ensure that the full amount of Lifeline support will be passed through to the qualifying low-income consumer by reducing the standard retail charge for the service plan by the full \$9.25 credit provided by FUSF under the Lifeline program.

G. Sage will only use a Lifeline Application form approved by the Missouri Universal Service Board, and any supplemental form will be submitted to the Commission Staff at least one business day prior to its use in Missouri, as will any changes to the supplemental form.

H. An explanation of how Sage will initiate Lifeline service to a subscriber is included in **Attachment G**.

I. An explanation of how Sage intends to annually verify a customer’s continued eligibility for the Lifeline program is included in **Attachment G**.

J. Pursuant to Proposed 4 CSR 240-31.130 (1) (D) 11, Sage states that, at the present time, it intends to use its own employees to sign-up subscribers to the Lifeline program. If, in the future, Sage decides to use agents or independent contractors who are not employees of Sage to sign-up subscribers to the Lifeline

program, Sage will notify the Commission and will take responsibility for these agents and independent contractors, and for their activities, as if they were legally employees of the applicant.

K. Sage commits to notify the Commission of any changes to company contact information.

L. Sage is compliant with all reporting and assessment obligations of the Commission.

M. Sage is compliant with contribution obligations to the FUSF.

N. Pursuant to Proposed 4 CSR 240-31.130 (1) (C), Sage submits **Attachment I** regarding common ownership and management information, designated as Highly Confidential (“HC”) under 4 CSR 240-2.135.

IX. DESIGNATING SAGE AS A COMPETITIVE ETC FOR LIFELINE-ONLY SERVICES WILL SERVE THE PUBLIC INTEREST

The primary purpose of universal service is to ensure that consumers – especially low-income consumers – receive affordable and comparable telecommunications services. A goal embodied in 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.¹⁵ A 2008 study has found such services to be a vital economic resource for low-income consumers that leads to improved wage levels and personal safety.¹⁶ Given this

¹⁵ Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56.

¹⁶ See Nicholas P. Sullivan, “Cell Phones Provide Significant Economic Gains for Low-Income American Households: A Review of Literature and Data from Two New Surveys,” April 2008, accessed at http://www.newmillenniumresearch.org/archive/Sullivan_Report_032608.pdf.

context, designating Sage as an ETC would serve the public interest generally, and the needs of low-income customers in Missouri in particular.

Wireless services afford consumers nationwide calling areas (as compared to traditional wireline carriers' local calling areas), convenience and personal security. Wireless service greatly benefits consumers who routinely drive long distances to attend work or school, or to accomplish everyday tasks such as shopping or attending community and social events. These and other benefits of wireless services are all in the public interest.

Sage will offer a pre-paid option that is designed to provide consumers who, due to credit or deposit requirements, may not be able to obtain telephone service from traditional providers, and Sage pre-paid customers are never obligated to pay for a period of service that exceeds 30 days. Because Sage prepaid service is provided with no credit check, deposit requirement, minimum service periods, or early termination fees, the service will be an affordable alternative to qualified low-income consumers. All of Sage's Lifeline pre-paid service offerings will include a minimum of 250 minutes of voice. Sage's Lifeline offerings will include caller ID, call waiting, voicemail, and 3-way calling at no extra charge. Sage's Lifeline service will be made available without a credit check, deposit or contract requirement.

Designation of Sage as an ETC will promote competition by increasing consumer choice. Upon designation as an ETC by the Commission, the Company intends to continue to offer quality customer service in Missouri.

X. CONCLUSION

Sage Telecom Communications, LLC respectfully submits that it has met the requirements for designation as a Lifeline-only Eligible Telecommunications Carrier (ETC) and, therefore, respectfully requests that the Commission grant ETC designation, pursuant to this Application, to Sage Telecom Communications, LLC.

Respectfully submitted,

/s/ William D. Steinmeier

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COUNSEL FOR SAGE TELECOM
COMMUNICATIONS, LLC

Date: July 3, 2013

CERTIFICATE OF SERVICE

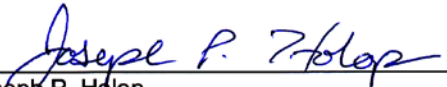
I do hereby certify that a true and correct copy of the foregoing document has been served electronically on the Commission's General Counsel's office at staffcounsel@psc.mo.gov and the Office of the Public Counsel at opc@ded.mo.gov on this 3rd day of July 2013.

/s/ William D. Steinmeier

William D. Steinmeier

VERIFICATION

I, Joseph P. Holop, first being duly sworn, hereby state that I am Chief Operations Officer of Sage Telecom Communications, LLC, that I am authorized to make this verification on behalf of Sage Telecom Communications, LLC, that I have read the foregoing Application for designation as an Eligible Telecommunications Carrier, that I have knowledge of the facts stated therein, and that the same are true and correct to the best of my knowledge, information and belief.



Joseph P. Holop
COO
Sage Telecom Communications, LLC

Subscribed and sworn before me this 1st day of July, 2013.



Notary Public

SEAL



SAGE TELECOM COMMUNICATIONS, LLC
MISSOURI LIFELINE ETC APPLICATION
LIST OF ATTACHMENTS
(Filed as separate pdf documents)

- A List of ILECs in whose service areas ETC authority is sought
- B Sage Approved FCC Compliance Plan
- C Notice of FCC Order Approving Sage Compliance Plan
- D Missouri Secretary of State Certificate
- E Officer's Affidavit Concerning Financial and Technical Qualifications -- **HC**
- F CTIA Code of Conduct
- G Sage Customer Verification and Certification, and Annual Recertification, Procedures
- H Sample Advertisement
- I Common Ownership/Management Information Per Proposed 4 CSR 240-31.130 (1) (C) -- **HC**