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April 10, 2023

Via ECFS

Jodie Griffin, Division Chief
Telecommunications Access Policy Division
Wireline Competition Bureau
Federal Communications Commission
45 L Street NE
Washington, DC 20554

RE: TruConnect Communications, Inc. Lifeline Compliance Plan;
Federal-State Joint Board on Universal Service, *et al.*, WC Docket Nos.
09-197, 11-42

Dear Ms. Griffin:

On December 26, 2012, Telscape Communications, Inc. (Telscape) received approval from the Wireline Competition Bureau (Bureau) of its Compliance Plan for its wireless Lifeline services.¹ The Company recently became aware that its approved Compliance Plan did not reflect its current name TruConnect Communications, Inc. (TruConnect or the Company). In addition, TruConnect has changed certain of its practices and procedures so that it does not needlessly duplicate tasks now handled by the National Verifier, National Lifeline Accountability Database (NLAD) or state administrators, and to reflect current Lifeline rules. As a courtesy, the Company hereby notifies the Bureau of the following changes.

First, Telscape advises the Bureau that it changed its name to TruConnect through an amendment to its Certificate of Incorporation. On September 28, 2015, the Secretary of State of the State of Delaware recognized the amended Certificate of Incorporation and the name change.

¹ See generally *Wireline Competition Bureau Approves the Compliance Plans of AirVoice Wireless, AmeriMex Communications, Blue Jay Wireless, Millennium 2000, Nexus Communications, PlatinumTel Communications, Sage Telecom, Telrite and Telscape Communications*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 12-2063 (rel. Dec. 26, 2012).



Since the Company formally changed its name in 2015, the Company's filings with the Commission have indicated that it does business as TruConnect. However, by this letter, the Company clarifies that its official corporate name for all purposes, including its provision of Lifelines services, is TruConnect Communications, Inc. The Company requests that the Bureau update its name in all relevant records.

Second, the Company notifies the Bureau that it has changed certain of its practices and procedures so that it does not needlessly duplicate tasks now handled by the National Verifier, NLAD or state administrators, and to reflect current Lifeline rules. Because performing a practice that is duplicative of those functions now performed by Universal Service Administrative Company (USAC) and its National Verifier and NLAD database, or state administrators, is not necessary to achieve compliance, the Company does not view any of these changes as being "material" changes warranting filing and approval of a revised compliance plan.² Processes must evolve to keep pace with changing rules and, when appropriate, to remove unnecessary burdens from service providers and Lifeline applicants and subscribers.

The Company uses this opportunity to notify the Bureau of changes to its processes so that compliance functions that were once done by TruConnect, but no longer are necessary, are no longer part of any perceived compliance plan obligations. The Company also advises that its processes have been updated to reflect the current regulatory landscape.

Specifically, the following process changes have been made to ensure the Company's continued compliance with the Commission's Lifeline rules:

- (a) The Company³ no longer undertakes functions that are performed or are rendered unnecessary by the National Verifier, NLAD or state administrators. Those functions include dipping of state databases and collection and review of proof of eligibility for purposes of (1) determining whether an applicant is currently receiving Lifeline benefits from another Lifeline service provider; (2) initially certifying Lifeline applicants' eligibility; or (3) annually recertifying Lifeline subscribers' continued eligibility.
- (b) The Company does not make any determinations regarding whether an applicant meets income-based or program-based eligibility criteria, nor does it make any determinations regarding whether a Lifeline subscriber has completed the annual re-certification of eligibility.

² See *Wireline Competition Bureau Reminds Carriers of Eligible Telecommunications Carrier Designation and Compliance Plan Approval Requirements for Receipt of Federal Lifeline Universal Service Support*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 14-1052 (rel. July 24, 2014).

³ Reference to the Company encompasses employees, customer service representatives, and agents.

- (c) To the extent that the Company offers a Lifeline service that does not require it to assess and collect a monthly fee from its subscribers, the Company will not seek Lifeline support for a subscriber until the subscriber activates the service by a means specified by the Company in its terms and conditions.⁴
- (d) The Company conducts the enrollment and de-enrollment process consistent with the requirements of NLAD.⁵ To the extent that the Company provides Lifeline service in California, an NLAD opt-out state, it conducts the enrollment and de-enrollment process consistent with the requirements of the California Third Party Administrator's requirements.
- (e) The Company provides de-enrollment notices to subscribers after 30 days of non-usage indicating that failure to use the service within the 15-day notice period will result in service termination for non-usage.⁶
- (f) The Company has updated its Lifeline service offerings and marketing materials to reflect current minimum service standards and market realities.⁷
- (g) The Company has replaced its application and certification form and its income eligibility worksheet with the universal forms as required by the Commission.⁸
- (h) The Company uses the Lifeline Claims System in the NLAD for reimbursement.⁹
- (i) The Company's underlying carrier has shifted from Sprint to T-Mobile, because of a merger between those two carriers. The Company's wireless coverage continues to

⁴ See 47 CFR § 54.407(c)(1). The Company no longer charges an activation fee to Lifeline subscribers in all states where it offers Lifeline service, except for California. In California, a one-time activation fee of \$39 is charged to all new or transferred accounts. If a California LifeLine household is not eligible to receive the \$39 activation fee from the California Lifeline Fund, TruConnect will use its own funds to credit the activation fee.

⁵ See 47 CFR § 54.404.

⁶ See 47 CFR § 54.405(e)(3).

⁷ See 47 CFR § 54.408. The Company's current Lifeline service offerings are available at <https://www.truconnect.com/lifeline>.

⁸ 47 CFR § 54.410(d); *Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline Program*, WC Docket No. 11-42, Public Notice, DA 18-161 (rel. Feb. 20, 2018).

⁹ See USAC, *Lifeline Claims System (LCS)*, <https://www.usac.org/lifeline/lifeline-claims-system-lcs/> (last visited June 8, 2022).

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include 911/E911 access and 911/E911 compliant handsets compatible with its underlying carrier's network.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically. Please feel free to contact me if you have any questions.

Respectfully submitted,

A handwritten signature in cursive script that reads "Joshua Guyan".

Joshua Guyan
John J. Heitmann
Debra McGuire Mercer

Counsel to TruConnect Communications, Inc.

cc: Nicholas Page