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August 31, 2018

VIA ELECTRONIC DELIVERY

Office of Administration
Public Utilities Commission of Ohio
180 E. Broad St.
Columbus, OH 43215-3793
(614) 466-3016

Re: **In the Matter of Petition of AT&T Ohio Seeking to Relinquish its Eligible Telecommunications Carrier Designation in a Portion of its Service Area; Case No. 17-1948-TP-UNC**

Dear Madam/Sir:

Enclosed for filing in the above-referenced docket, please find the Comments of Sage Telecom Communications, LLC d/b/a TruConnect in Response to the Commission's June 28, 2018 Notice for Comments concerning The Ohio Bell Telephone Company dba AT&T Ohio's Relinquishment of its eligible telecommunications carrier ("ETC") designation in portions of its service area in the State of Ohio.

If you have any questions, or if we may provide you with additional information, please do not hesitate to contact me. Thank you for your attention to this matter.

Respectfully submitted,



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Enclosures

cc: Nathan Johnson

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

**IN THE MATTER OF THE PETITION OF)
AT&T OHIO SEEKING TO RELINQUISH)
ITS ELIGIBLE TELECOMMUNICATIONS)
CARRIER DESIGNATION IN A PORTION)
OF ITS SERVICE TERRITORY)
)**

Case No. 17-1948-TP-UNC

**COMMENTS OF SAGE TELECOM COMMUNICATIONS, LLC
D/B/A TRUCONNECT IN RESPONSE
TO JUNE 28, 2018 NOTICE FOR COMMENT**

Sage Telecom Communications, LLC d/b/a TruConnect (“TruConnect” or the “Company”) files these Comments in response to the Public Utilities Commission of Ohio’s (“Commission”) June 28, 2018 Notice for Comment, directing TruConnect to submit comments on or before August 31, 2018, indicating whether it is willing and able to ensure that all customers served by The Ohio Bell Telephone Company dba AT&T Ohio (“AT&T Ohio”) in its respective service areas will continue to be served with the federal Lifeline discount if the customer is eligible, in the event that the Commission permits AT&T Ohio to relinquish its eligible telecommunications carrier (“ETC”) designation as requested. The Commission further seeks TruConnect to identify whether such Lifeline service will be provided on a wireline or wireless and facilities or resale basis.

TruConnect was originally granted ETC status by the Commission on June 11, 2014 throughout the service areas approved in Case No. 13-514-TP-UNC. As was disclosed in its original application, TruConnect offers Lifeline service primarily through the resale of facilities-based wireless carriers’ services and facilities.

It is TruConnect’s intent to continue to make available its wireless Lifeline service with the federal discount to its current subscribers and all qualifying applicants that it is able to serve.

However, as this Commission is aware, the Federal Communications Commission (“FCC”) is considering whether to disallow the participation of wireless resellers in the Lifeline program altogether.¹ TruConnect appreciates that this Commission filed comments with the FCC on February 21, 2018 in the pending NPRM opposing the elimination of support for non-facilities-based Lifeline providers.² TruConnect and other Lifeline providers have also actively opposed this and other proposals in the NPRM that would greatly harm TruConnect’s ability to continue to provide Lifeline service.³

With that in mind, TruConnect intends to continue to offer Lifeline service to qualifying subscribers throughout its service territory in Ohio unless prohibited directly from doing so by the FCC or unless the FCC imposes regulations that would result in less-direct but equally harmful requirements, such as its consideration of a requirement that wireless resellers pass 100% of federal support through to its underlying facilities-based provider. Should anything necessitate a prospective change in TruConnect’s approach to the Ohio Lifeline marketplace, TruConnect will inform the Commission.

Based on the foregoing, TruConnect does not object to AT&T Ohio’s application to relinquish its ETC designation for purposes of universal services fund support—and TruConnect stands ready to offer its wireless Lifeline service options to eligible Lifeline subscribers in

¹ See Bridging the Digital Divide for Low-Income Consumers, Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, WC Docket Nos. 17-287, 11-42, 09-197, *Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry*, FCC 17-155 (rel. Dec. 1, 2017) (“NPRM”), §§ 67–73.

² See Comments Submitted on Behalf of the Public Utilities Commission of Ohio, WC Docket No. 17-287 et al. (filed Feb. 21, 2018).

³ See, *i.e.* Comments of the National Lifeline Association, WC Docket No. 17-287 et al. (filed Feb. 21, 2018); Reply Comments of the National Lifeline Association, WC Docket No. 17-287 et al. (filed Mar. 23, 2018); *Ex Parte* Letter from John J. Heitmann, Counsel to the National Lifeline Association, to Marlene Dortch, Secretary, Federal Communications Commission, WC Docket No. 17-287 et al. (filed May 4, 2018).

Ohio—provided that the FCC permits the participation of wireless resellers in the Lifeline program.

Please feel free to contact me if you wish to discuss this matter further or have any questions.

Respectfully submitted,

Sage Telecom Communications, LLC d/b/a TruConnect

Lance J.M. Steinhart

By: _____

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in

Case No(s). 17-1948-TP-UNC

Summary: Comments of Sage Telecom Communications, LLC d/b/a TruConnect in Response to the Commission's June 28, 2018 Notice for Comments electronically filed by Lance Steinhart on behalf of Sage Telecom Communications, LLC