

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter of the application of)	
TRUCONNECT COMMUNICATIONS, INC.,)	
for designation as an eligible telecommunications)	Case No. U-21544
carrier in the state of Michigan.)	
_____)	

At the June 6, 2024 meeting of the Michigan Public Service Commission in Lansing,
Michigan.

PRESENT: Hon. Daniel C. Scripps, Chair
Hon. Katherine L. Peretick, Commissioner
Hon. Alessandra R. Carreon, Commissioner

ORDER

On December 28, 2023, TruConnect Communications, Inc. (TruConnect) filed an application (December 28 application) pursuant to Section 214(e)(2) of the federal Communications Act of 1934, 47 USC 214(e)(2), for designation as an eligible telecommunications carrier (ETC) for access to Universal Service Fund (USF) support for the sole purpose of providing Lifeline service to qualifying Michigan consumers. On May 6, 2024, TruConnect filed an amended application (May 6 amended application). TruConnect requests that the Commission enter an order designating it as a Lifeline ETC throughout the entire state of Michigan, which includes the exchanges listed in Exhibit 4 of the May 6 amended application. The coverage area will also include the 12 federally recognized Tribal Lands located throughout the state of Michigan. TruConnect is not seeking a High Cost designation at this time. May 6 amended application, pp. 1-2, 10; *see also*, Exhibit 4 to the May 6 amended application.

TruConnect states that it provides resold prepaid wireless telecommunications services to consumers by using the underlying wireless networks of Verizon Wireless (Verizon) and T-Mobile. May 6 amended application, p. 12. TruConnect will offer the supported services through the exclusive use of another carrier's facilities. *Id.*, p. 3. Therefore, TruConnect has provided proof of a Federal Communications Commission (FCC) approved compliance plan that was approved on December 26, 2012. *Id.*, p. 7; *see also*, Exhibit 3 to May 6 amended application. TruConnect states that it is able to provide all required voice telephony supported services including: (1) voice grade access to the public switched network, (2) local usage at no additional charge, (3) access to emergency services, and (4) toll limitation. Additionally, TruConnect states that it provides broadband internet access services (BIAS) to ensure its Lifeline customers receive full Lifeline support. May 6 amended application, pp. 8-9.

TruConnect states that it is committed to compliance with all applicable consumer protection and service quality standards for universal service programs, including a commitment to comply with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service. *Id.*, p. 14. TruConnect also states that it will be managerially and legally responsible for handling and responding to any customer issues. *Id.* TruConnect further indicates that its services are able to remain functional in emergency situations. *Id.*, pp. 13-14. TruConnect states that it will utilize the extensive and well-established network and facilities of T-Mobile and Verizon to provide its Lifeline services. TruConnect explains that its underlying carriers, T-Mobile and Verizon, have certified to the FCC that their networks function in emergency situations and that they have access to a reasonable amount of back-up power to ensure functionality without an external power source, can reroute traffic around damaged facilities, and are capable of managing traffic spikes resulting from emergency situations. *Id.* As further attestation to T-Mobile's

emergency preparedness capabilities, TruConnect has provided a letter, Exhibit 6 to the May 6 amended application, that describes the emergency preparedness of its network. Finally, TruConnect informs the Commission that its underlying carrier, Verizon, has permanent generators for 78% of its microcell sites in the United States, while 100% of the microcell sites have battery backup. May 6 amended application, p. 14.

Further, TruConnect states that it will comply with the FCC's requirements of advertising its Lifeline service as required by 47 CFR 54.201(d)(2) as well as rule 47 CFR 54.405(c). 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. TruConnect has included an example of its Michigan-specific Lifeline advertisement as Exhibit 5 to the May 6 amended application. May 6 amended application, pp. 11-12.

Finally, TruConnect declares it is willing and able to comply with the rules and regulations that the Commission may lawfully impose. *Id.*, p. 13.

After reviewing TruConnect's application, the Commission finds that the ETC designation, limited to wireless Lifeline only throughout the exchanges listed in Exhibit 4 to the May 6 amended application, should be conditionally granted. The Commission is persuaded that ETC designation for TruConnect promotes the availability of universal service and is in the public interest. The Commission finds that the application demonstrates that TruConnect meets the requirements for designation as an ETC. *See*, 47 USC 214(e)(1). The December 28 application, as amended, for ETC designation is granted on condition that TruConnect shall: (1) comply with the service requirements contained in the *USF/ICC Transformation Order*¹ and subsequent related

¹ *See*, [FCC Releases Connect America Fund Order, Reforms USF/ICC for Broadband | Federal Communications Commission](#) (accessed June 5, 2024).

federal and state rulings, the *Lifeline Reform Order*,² and the December 20, 2012 and January 17, 2013 orders in Case Nos. U-14535 and U-16959; (2) advertise its Lifeline product in media of general distribution including newspaper, radio, its own website, and other direct advertising methods; (3) include the Commission's customer complaint telephone number on its public web page; (4) by June 24, 2024, submit a certification letter to each county 9-1-1 coordinator in Michigan explaining the Lifeline service, with information on TruConnect's product and service specifications, stating that it will be providing 9-1-1 service to TruConnect's customers and by July 8, 2024, file in this docket a proof of service reflecting timely service of each letter; (5) submit information, on a quarterly basis based on the calendar year, in this docket, on the number of Lifeline customers it is serving, and the amounts paid to individual counties and the State of Michigan for 9-1-1 surcharges; and (6) promptly notify the Commission of any future changes to its rates, terms, and conditions regarding its low-income offerings in this docket.

TruConnect shall be required to file all annual forms with the Commission in accordance with Commission and FCC requirements, to retain its ETC designation.

THEREFORE, IT IS ORDERED that the December 28, 2023 application, as amended, filed by TruConnect Communications Inc., for designation as an eligible telecommunications carrier for purposes of Universal Service Fund support for Lifeline only in the areas listed in Exhibit 4 to the May 6, 2024 amended application is conditionally approved as set forth in this order.

The Commission reserves jurisdiction and may issue further orders as necessary.

² *In the Matter of Lifeline and Link Up Reform and Modernization et al.*, WC Docket No.11-42 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, Order No. FCC 12-11, *rel'd* February 6, 2012 (*Lifeline Reform Order*). See, <https://www.fcc.gov/document/fcc-reforms-modernizes-lifeline-program-low-income-americans> (accessed May 28, 2024).

Any party desiring to appeal this order must do so by the filing of a claim of appeal in the Michigan Court of Appeals within 30 days of the issuance of this order, under MCL 484.2203(12). To comply with the Michigan Rules of Court's requirement to notify the Commission of an appeal, appellants shall send required notices to both the Commission's Executive Secretary and to the Commission's Legal Counsel. Electronic notifications should be sent to the Executive Secretary at LARA-MPSC-Edockets@michigan.gov and to the Michigan Department of Attorney General - Public Service Division at pungpl@michigan.gov. In lieu of electronic submissions, paper copies of such notifications may be sent to the Executive Secretary and the Attorney General - Public Service Division at 7109 W. Saginaw Hwy., Lansing, MI 48917.

MICHIGAN PUBLIC SERVICE COMMISSION

Daniel C. Scripps, Chair

Katherine L. Peretick, Commissioner

Alessandra R. Carreon, Commissioner

By its action of June 6, 2024.

Lisa Felice, Executive Secretary


PROOF OF SERVICE

STATE OF MICHIGAN)

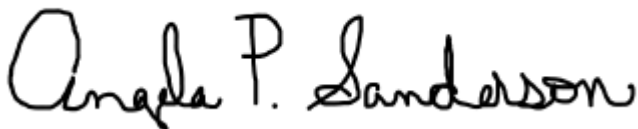
Case No. U-21544

County of Ingham)

Brianna Brown being duly sworn, deposes and says that on June 6, 2024 A.D. she electronically notified the attached list of this **Commission Order via e-mail transmission**, to the persons as shown on the attached service list (Listserv Distribution List).


Brianna Brown

Subscribed and sworn to before me
this 6th day of June 2024.



Angela P. Sanderson
Notary Public, Shiawassee County, Michigan
As acting in Eaton County
My Commission Expires: May 21, 2030

Service List for Case: U-21544

Name	On Behalf Of	Email Address
Debra McGuire Mercer	TruConnect Communications Inc.	debra.mercer@nelsonmullins.com
TruConnect Communications Inc.	TruConnect Communications Inc.	debra.mercer@nelsonmullins.com