

PUBLIC DISCLOSURE DOCUMENT

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

Application of Sage Telecom
Communications, LLC d/b/a TruConnect
for Designation as an Eligible
Telecommunications Carrier in the State of
Georgia

Docket No. 38390

**SUPPLEMENT TO PETITION OF SAGE TELECOM
COMMUNICATIONS, LLC D/B/A TRUCONNECT TO EXPAND
ITS ELIGIBLE TELECOMMUNICATIONS CARRIER SERVICE AREA**

Sage Telecom Communications, LLC d/b/a TruConnect (Sage Telecom or the Company), by its undersigned counsel, files this supplement to its Petition to Expand its Eligible Telecommunications Carrier Service Area, filed in this docket on September 8, 2023. By this supplement, Sage Telecom does the following: (1) provides the consolidated financial statements of TSC Acquisition Corporation and its subsidiaries (Sage Telecom is one the TSC's subsidiaries) and (2) provides proof that Sage Telecom is authorized to resell Verizon Wireless service. These documents are being provided in response to a request from the Georgia Public Service Commission (Commission) Staff.

The consolidated financial statements are provided as Exhibit 1. Exhibit 1 contains confidential financial data that the Company considers to be a trade secret as defined in Section 10-1-761(4) of the Georgia Code.¹ Therefore, Sage Telecom is submitting Exhibit 1 under protective seal with the designation "TRADE SECRET" in accordance with Commission Rule 515-3-1-.11.² In accordance with the Commission's rules, Sage Telecom is filing a public version of this supplement with trade secret information redacted. Attached as Exhibit 2 is an

¹ Ga. Code Ann. § 10-1-761(4).

² Ga. Comp. R. & Regs. 515-3-1-.11.

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affidavit in support of Sage Telecom’s claim that the protected information is a trade secret.

Exhibit 3 is a letter from Verizon Wireless acknowledging that it has entered into a wholesale reseller agreement with TruConnect Communications, Inc. (“TruConnect”) that does not restrict TruConnect from authorizing third-party entities, including affiliates, from serving as sub-resellers. TruConnect has authorized Sage Telecom (its affiliate) to serve as a Verizon Wireless sub-reseller.

Based on the foregoing and for the reasons stated in its Petition, Sage Telecom respectfully requests that the Commission promptly grant its Petition and expand Sage Telecom’s Lifeline-only ETC service area.

Respectfully submitted,



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Nelson Mullins Riley & Scarborough LLP
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Suite 900
Washington, DC 20001
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debra.mercer@nelsonmullins.com

Counsel for Sage Telecom Communications, LLC

February 16, 2024

Exhibit 1

Exhibit 2

AFFIDAVIT

STATE OF CALIFORNIA

COUNTY OF SUSSEX

I, Nathan Johnson, on behalf of Sage Telecom Communications, LLC d/b/a TruConnect (Sage Telecom or the Company), after first being duly sworn, do hereby state the following:

1. My name is Nathan Johnson and I am the Co-Chief Executive Officer of Sage Telecom. My business address is 1149 South Hill Street, Suite H-400, Los Angeles, California 90015. In my position as Co-Chief Executive Officer, I am authorized to provide this statement on behalf of the Company.

2. I am providing this affidavit in support of the Supplement to Petition of Sage Telecom Communications, LLC d/b/a TruConnect to Expand Its Eligible Telecommunications Carrier Service Area (Supplement) and the Company's assertion that the information in Exhibit 1 to the Supplement is a trade secret that should not be disclosed to the public.

3. Exhibit 1 provides the consolidated financial statements of TSC Acquisition Corporation and its subsidiaries in response to a request from the Georgia Public Service Commission Staff. Sage Telecom is one of the TSC's subsidiaries.

4. The confidential financial information contained in Exhibit 1 derives economic value from not being generally known to others, and in particular, to competitors. The provision of wireless telecommunications services is a competitive business in which Sage Telecom is one of several competitors. Public disclosure of the Company's confidential financial information would enable competitors to learn details about Sage Telecom's financial situation and to

unfairly take advantage of this confidential information to develop their own strategies for providing wireless telecommunications services. As such, Sage Telecom's competitors can obtain economic value from disclosure of the information in Exhibit 1.

5. Sage Telecom treats the information in Exhibit 1 as confidential and does not authorize its employees to disclose this information to third parties. The information in Exhibit 1 is only available to those employees requiring the information to perform their duties to the Company. Sage Telecom has not disclosed the information to any unauthorized third party nor to the public.

6. Based on the foregoing, the information in Exhibit 1 is a trade secret as defined in Section 10-1-761(4) of the Georgia Code (Ga. Code Ann. § 10-1-761(4)) and should not be disclosed to the public.

7. The undersigned hereby certifies that the information contained herein is true and accurate to the best of my information and belief.

By: 
Nathan Johnson
Co-Chief Executive Officer
Sage Telecom Communications,
LLC d/b/a TruConnect

Sworn to and subscribed before me this ___ day of February, 2024.

see attached certificate

Notary Public

My commission expires:



A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

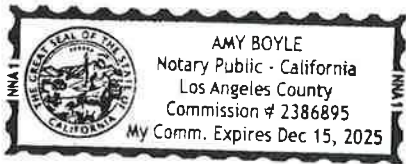
County of Los Angeles

Subscribed and sworn to (or affirmed) before me on this 15th day of February, 2024, by
Date Month Year

(1) Nathan Johnson

(and (2) N/A),
Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.



Signature [Signature]
Signature of Notary Public

Place Notary Seal and/or Stamp Above

OPTIONAL

Completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: _____

Document Date: _____ Number of Pages: _____

Signer(s) Other Than Named Above: _____



Exhibit 3



5055 North Point Pkwy
Alpharetta, GA 30022

Jen Avery
Associate Director – VCG Chl Mgt
Verizon Wholesale

February 15, 2024

via email dperry@truconnect.com

Danielle Perry
Chief Compliance Officer
1149 S Hill Street
Suite 240
Los Angeles, CA 90015

Re: TruConnect ETC in Georgia

Dear Ms. Perry:

Pursuant to your request, and only for the purposes of your pending application for Eligible Telecommunications Carrier status before the State of Georgia, you may disclose this letter to the applicable Georgia authorities for purposes of the foregoing application.

By this letter, Verizon hereby acknowledges that Cellco Partnership d/b/a Verizon Wireless ("Verizon") entered into a three-year Wholesale Reseller Agreement with TruConnect Communications, Inc. d/b/a TruConnect ("TruConnect") on July 21, 2022 ("Agreement"). The Agreement does not restrict TruConnect from entering into reseller agreements with third-party entities (affiliated or otherwise) to serve as sub-resellers, including, for example, Sage Telecom.

Yours sincerely,

A handwritten signature in black ink that reads "Jen Avery". The signature is written in a cursive, flowing style.

Jen Avery
Associate Director

cc: Leslie Ives
Joseph Faust