
**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE FILING OF
TRUCONNECT COMMUNICATIONS,
INC.'S PETITION FOR DESIGNATION
AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER
IN THE STATE OF SOUTH DAKOTA
FOR THE LIMITED PURPOSE OF
PROVIDING LIFELINE SERVICE TO
QUALIFYING CUSTOMERS**

Docket No. TC24-004

**TRUCONNECT COMMUNICATIONS, INC.'S RESPONSE TO SECOND DATA
REQUEST OF SOUTH DAKOTA PUBLIC UTILITIES COMMISSION STAFF**

TruConnect Communications, Inc. (TruConnect) provides the following response to the second data request of the South Dakota Public Utilities Commission Staff issued on August 29, 2024.

Dated: September 12, 2024

RESPONSE TO SECOND DATA REQUEST

- 2-1. In prior communications with Staff and SDTA, TruConnect provided a list of exchanges associated with TruConnect's coverage area and a map illustrating TruConnect's proposed service area by zip code.**

Response

TruConnect has filed the requested information in the docket. The map filed in the docket differs from the map previously provided to Staff and SDTA in that it was revised to shade zip codes with limited geographic coverage in a different color than other zip codes in accordance with Request 2-3.

- 2-2. Confirm whether or not TruConnect will be serving the zip codes that are shaded in white.**

Response

TruConnect will not be serving the zip codes that are shaded in white on the map.

- 2-3. Please list the zip codes in which TruConnect will have limited geographic coverage and shade these zip codes a different color on the map.**

Response

TruConnect will have limited geographic coverage in the following zip codes: 57645, 57724, 57732, 57730, 57634, 57661, 57759, 57620 and 57644. Although there is limited geographic coverage in the foregoing zip codes, geographic coverage is not synonymous with population coverage. The listed zip codes are shaded in a different color on the map filed in this docket.

- 2-4. In prior communications with SDTA and Staff, TruConnect certified (in accordance with ARSD 20:10:32:43.01) that it commits to provide service throughout its proposed designated service area to all customers making a reasonable request. If a customer is located in an area with limited geographic coverage and makes a request for service, describe in detail how TruConnect will comply with ARSD 20:10:32:43.01(2).**
- a. Does TruConnect anticipate that any such request will impose excessive or unreasonable cost, meaning that TruConnect would not be required to serve such a customer?**

Response

As noted in response to Request 2-4, geographic coverage is not synonymous with population coverage. Therefore, although there are some limitations to the geographic coverage in the zip codes listed in response to Request 2-4, that does not necessarily result in any households not being able to receive service. When a customer requests service, TruConnect determines which underlying carrier's network can provide the best service to the customer and then places that customer on that network. If a customer advises TruConnect that they have problems with their service, TruConnect will contact the underlying carrier to investigate and troubleshoot the issue. If the underlying carrier is unable to provide a solution then TruConnect will examine whether changing the customer's service to another network would improve the service. If a change to the customer's underlying network does not improve their service, then TruConnect will work with the customer to determine if they want to keep their service.

TruConnect, as a reseller, does not control or own any facilities used to provide service. Therefore, it is unable to take certain actions listed in ARSD 20:10:32:43.01(2), including extending facilities, adjusting cell towers, adjusting the network or facilities or otherwise adding facilities. *See* ARSD 20:10:32:43.01(2)(b), (c), (d) and (f). The foregoing actions also would impose an excessive and unreasonable cost. However, to

the extent that it is determined that there is a manufacturer's problem with a handset purchased from TruConnect that is causing a problem with service, TruConnect will replace the handset. *See* ARSD 20:10:32:43.01(2)(a). TruConnect relies on the networks of both Verizon and T-Mobile to provide service in South Dakota. These two carriers offer state-of-the-art service and provide superior coverage throughout the country, including in South Dakota. Requiring TruConnect to enter into an agreement with another carrier as a means to provide service to a potential customer would impose an excessive and unreasonable cost. *See* ARSD 20:10:32:43.01(2)(e).

- 2-5. Describe the process in place for TruConnect to determine whether they can provide service to a customer making a request.**
- a. Prior to signing a customer up for service, does TruConnect verify that the customer lives in a location which has good coverage?**
 - b. Will TruConnect inform a potential customer if they reside in an area with limited geographic coverage and may not have good coverage at their home?**

Response

TruConnect relies on coverage information from its underlying carriers to determine whether it can provide service to a customer. Its underlying carriers define their coverage areas by zip code. As noted above, when a particular zip code has limited geographic coverage it does not necessarily mean that populated areas within that zip code have limited coverage. If an individual resides in a zip code for which its underlying carriers provide service, TruConnect will accept that individual as a customer. TruConnect values its reputation for providing high quality service to its customers, and takes all possible actions to ensure that each customer receives high quality service.

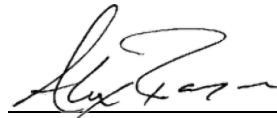
Instances in which a customer had advised TruConnect that they do not have satisfactory coverage at their residence is extremely rare.

DECLARATION

I, Alex Rasor, state that I am Vice President, Compliance of TruConnect Communications, Inc. ("TruConnect"); that I am authorized to make this Declaration on behalf of TruConnect; that I have read the foregoing document; and that the statements in the foregoing document with respect to TruConnect are true and accurate to the best of my knowledge, information and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 09/09/2024



Alex Rasor
Vice President, Compliance
TruConnect Communications, Inc.