
**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

SDTA Comments

The South Dakota Telecommunications Association (SDTA) respectfully requests the South Dakota Public Utilities Commission (Commission) consider the following comments and argument when ruling on the TruConnect Communications, Inc. (TruConnect or Applicant) filing and request for Eligible Telecommunications Carrier (ETC) designation for Lifeline purposes. On or about January 17, 2024, the Applicant requested the Commission designate it as an ETC in the State of South Dakota solely for the purpose of offering Lifeline services to qualifying customers. (Application). The designation sought is also known as a “Lifeline-only ETC designation.”

Introduction

The Lifeline program, and provider expectations evolved over the years as technology and consumer needs changed. Along with that evolution, the FCC issued various “forbearance orders”

that impact the scope of this Commission’s decision-making authority.¹ However, the FCC specifically preserved and reserved the public interest analysis for this Commission’s consideration.² The Commission remains obligated to review the TruConnect application for accuracy, to judge whether it meets the letter of the law in South Dakota and to make a finding on the public interest factors found at ARSD 20:10:32:43.07.

As a preliminary matter, SDTA does not agree with how TruConnect describes or characterizes the state of rural broadband or Lifeline availability in rural South Dakota. Likewise, SDTA disagrees with how TruConnect claims it will impact the availability of Lifeline in South Dakota. SDTA argues TruConnect’s efforts to advocate for its *version* of a Lifeline product ignore basic South Dakota Lifeline and broadband availability facts.

For example, TruConnect claims there are “lower income communities, especially in rural areas,” that are “predominately unserved by other ETCs designated in the state.”³ TruConnect does not, however, provide any specificity regarding the location of the alleged unserved rural customers. TruConnect terms these rural customers a “neglected consumer segment” without providing any detail regarding their location.⁴ SDTA disputes any allegation that un- or underserved customers exist within SDTA member company service areas.

Customers in SDTA service areas are not “neglected.” SDTA’s members serve large portions of

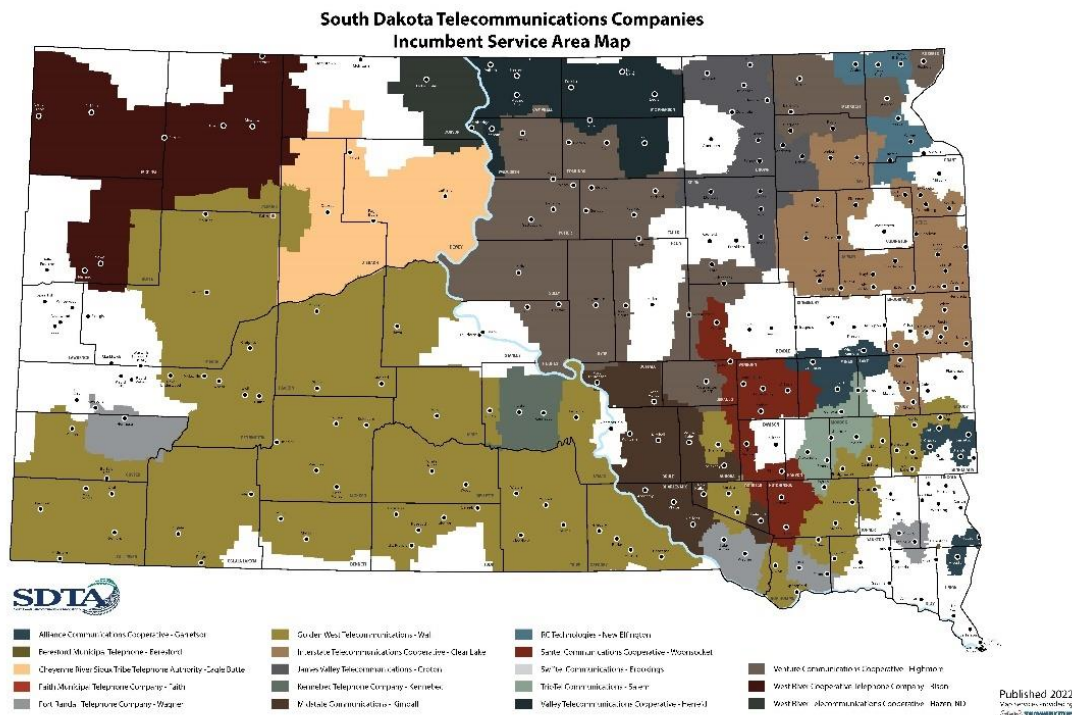
¹ *In the Matter of Lifeline and Link Up Reform and Modernization*, WC Docket 11-42, February 6, 2012, Para 379, and *In the Matter of Telecommunications Carriers Eligible or Support*, WC Docket 09-197, April 15, 2013, Para 13.

² “State commissions are still required to consider the public interest, convenience, and necessity of designating carriers as competitive ETCs in rural areas already served by a rural telephone company. Our decision here to grant forbearance for Lifeline only designations does not disturb the roles of State commissions and this Commission in the ETC designation process...” *In the Matter of Telecommunications Carriers Eligible or Support*, WC Docket 09-197, April 15, 2013, Para 14.

³ TruConnect Application, page 4.

⁴ TruConnect Application, page 12.

the rural areas in South Dakota.⁵ All SDTA member companies have received ETC designations and offer Lifeline services to their qualifying low-income customers. Currently, to SDTA's knowledge there are no areas of un- or underserved Lifeline eligible customers within any of the established SDTA member company service or study areas. TruConnect's blanket statement suggesting that "rural areas" in South Dakota lack access to Lifeline services is untrue. SDTA member company incumbent service areas are shown on the map below. All customers in the colored areas of the map have access to high quality, reliable Lifeline services.



While SDTA disputes any general allegation or statement that rural places in South Dakota lack access to Lifeline, SDTA acknowledges that SDTA member companies are generally

⁵ SDTA companies are rural telephone companies as defined by 47 CFR §51.5.

terrestrial based and focused on the deployment and operation of fiber to the premises infrastructure. There may be a place in the low-cost communications ecosystem for wireless prepaid Lifeline services of the type offered by TruConnect. However, it is misleading for TruConnect to portray its wireless Lifeline service plans, which are clearly structured to meet only the minimum federal Lifeline obligations for broadband data services, as being either comparable or equal to the fixed fiber broadband services made available by the SDTA members. For example, SDTA takes issues with TruConnect's unqualified statement that:

“Mobile service allows children to reach their parents, wherever they may be, allows a person seeking employment greater ability to be contacted by potential employers, and provides end users the ability to contact emergency service providers regardless of the location.”⁶

TruConnect also stretched the truth when it asserted that:

“Mobile service often also serves as a key bridge in closing the homework gap for students who live in rural areas with limited access to broadband.”⁷

In reality, the following limitations exist for all wireless Lifeline consumers everywhere:

- Each household is entitled to only one Lifeline subscription. A wireless Lifeline product cannot easily serve the needs of more than one person. When the Lifeline wireless phone is away from the home, other members of the household do not have access to Lifeline communications services. Alternatively, a wired Lifeline service can and does serve the whole household. Therefore, to maintain home access to emergency services (911) and communication with other family members, it is necessary to maintain land line services in addition to the Lifeline wireless service.
- The wireless plans that TruConnect offers are limited by available data and speed. If data expires, the consumer and his/her family will lose connectivity with the world and each other (including prospective employers). A wired connection, on the other hand, has far greater available minutes/data and is often limitless.
- The reliability of the wireless product TruConnect offers will be impacted by weather, network congestion, terrain, and tower location in proximity to the customer. It is not accurate to “sell” a customer on 100% reliability all of the time regardless of location.

⁶ TruConnect Application Page 22.

⁷ Id.

That is simply not the science of wireless communication. A wired connection, on the other hand, is consistently reliable.

- The data plans TruConnect offers are not robust enough to serve a family’s needs. Given the widespread highspeed broadband to the premises infrastructure that exists across South Dakota it is inaccurate for TruConnect to claim it is solving a broadband access problem. TruConnect’s Lifeline plan offers 4.5 GB of data, an amount it refers to as “generous.”⁸ It is hard to imagine how this amount of data, which is not generous, will solve the homework gap. According to Open Vault, as of 4th quarter 2023, the average household consumes 641 GB of broadband data per month.⁹ A wired Lifeline connection, like those that exist throughout all SDTA member service areas, better meet the data needs of most families.

SDTA argues that TruConnect’s statements regarding the impact its products will have on the digital divide and the “homework gap” are inflated and inaccurate. Generally, TruConnect overstates and overpromises how its Lifeline product can serve South Dakota consumers and how its Lifeline wireless broadband product will impact overall South Dakota connectivity.¹⁰ Unrealistic and exaggerated advocacy is not helpful. Rather, consumers are best served when empowered with adequate information to make the best decision regarding how to meet household communication needs within available household financial constraints.

The Commission must determine whether designation of the applicant as an ETC is in the public interest.

The Commission must evaluate whether the TruConnect ETC application is in the “public interest.” The evaluation, found in both federal and state law, is not optional.¹¹ Given the mandate, in SDTA’s view, consideration of actual rural telephone company service area circumstances is relevant to determine whether an additional Lifeline designation would have

⁸ TruConnect Application page 21.

⁹ OpenVault’s Broadband Insights Report for the fourth quarter of 2023, https://openvault.com/wp-content/uploads/2024/02/OVBI_4Q23_Report_v3.pdf

¹⁰ TruConnect Application, page 20.

¹¹ 47 CFR 54.201, ARSD 20:10:32:42 and ARSD 20:10:32:43.07

positive or negative impact on existing rural service providers and voice and/or broadband consumers. As general matters of fact, SDTA would ask the Commission in conducting its public interest review to incorporate the following:

- (1) All the “rural telephone company” members of SDTA provide high quality voice and high-speed broadband services throughout their existing established “service areas.” Nearly all SDTA member companies provide the services through fiber transport and last-mile network facilities.
- (2) Existing federal and state grant programs are prioritizing fiber broadband deployments by either encouraging or requiring grant awardees to participate in the Lifeline and/or (before the program ended) ACP Programs, and in some cases even requiring further steps by awardees to address service affordability. Consistent with these and other similar grant programs, SDTA urges the Commission give due consideration to the unmatched data speeds, usage capacity, and longer-term advantages of fiber broadband investments in meeting consumer broadband needs and to avoid additional ETC designations in rural service areas that would disadvantage rather than support these investments.
- (3) In evaluating and weighing public interest benefits of an ETC Lifeline designation for any rural service areas, the Commission should consider the substantial differences existing in federal law between the current “minimum service standards” imposed by the FCC rules and orders for “Mobile Broadband” services versus “Fixed Broadband” services.

Currently, mobile broadband carriers designated as Lifeline ETCs are required to only offer a non-specific mobile broadband speed of “3G or better,” and a monthly “usage allowance” of only “4.5 GB.” These lower reduced mobile service standards are the result of several FCC waiver decisions occurring since the Lifeline and Link Up Programs were reformed and modernized in 2016. A recent “Order” of the FCC released July 3, 2024, granted another waiver pausing an increase in the minimum monthly mobile broadband usage allowance for another year.¹² In contrast, the minimum service standards for Lifeline imposed by the FCC on fixed broadband carriers have been revised often and carry a much greater data service obligation. At present the minimum speed required to be offered by fixed broadband carriers is “25/3 Mbps” and the required minimum monthly broadband data/usage allowance is 1,280 GB. These substantial differences in the required broadband speed and data minimums give good reason to question the comparative value of the two different Lifeline benefits and in SDTA’s view offer further justification for not granting a statewide ETC designation that includes all rural services areas.

¹²*In the Matter of Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42, Order released July 3, 2024, DA 24-642.

More specifically, the Commission must make a public interest finding based upon the considerations listed in SDTA 20:10:32:43.07. The required considerations are: (i) the benefits of increased consumer choice, (ii) the impact of multiple designations on the universal service fund, (iii) the unique advantages and disadvantages of the applicant's service offering, (iii) commitments made regarding the quality of the telephone service provided by the applicant, (iv) the applicant's ability to provide the supported services throughout the designated service area within a reasonable time frame and (v) whether the designation of the applicant will have detrimental effects on the provisioning of universal service by the incumbent local exchange carrier. SDTA addresses each aspect of the public interest below.

1. The benefits of increased consumer choice

The Application only offers general statements referencing the importance of promoting competition and increasing customer choice.¹³ Given these statements, it appears TruConnect takes the view that additional Lifeline-only ETC designations are always in the public interest and that little evidentiary or factual review by this Commission is necessary. SDTA disagrees. Consumers only benefit from choice when they understand what they are choosing between. In the case of mobile Lifeline (if landline service is terminated), the consumer is choosing individual device mobility over data quantity, family usage, and in some cases reliability. So long as the consumer understands the benefits and limitations of his or her various options, consumer choice may benefit South Dakotans. It is not clear from the TruConnect Application or its Discovery Answers whether it intends to help consumers in making educated decisions.

¹³ TruConnect Application page 23.

Concerns as to whether consumers will be given sufficient information to reasonably determine the actual capabilities and value of the TruConnect prepaid wireless service prior to purchase are heightened given TruConnect's lack of fully developed "sales" plans in South Dakota. TruConnect indicates that it plans to promote its service through partnership with state and local social service agencies, nonprofit assistance organizations and through its network of retail partners.¹⁴ However, in discovery the company explained that none of the described relationships had been established.¹⁵ It is unclear how TruConnect will train these third party "partners" and assure Lifeline Program compliance. Given these circumstances, SDTA recommends the Commission seek information from TruConnect on an annual basis to understand and learn of the South Dakota retail, nonprofit and local/state agency partnerships TruConnect utilizes to enroll consumers in the program.

2. The impact of multiple designations on the universal service fund and whether the designation of the applicant will have a detrimental effect on the provisioning of universal service by the incumbent local exchange carrier.

All the "rural telephone company" members of SDTA provide high quality voice and high-speed broadband services throughout their existing established "service areas." All these companies operate in areas considered "high cost" for FCC regulatory purposes and the FCC's Federal Universal Service Programs. The companies rely on federal "High-Cost Funds" for reimbursement of a portion of their network and operational costs and, as already designated ETCs, also participate in the FCC's "affordability" related programs, including Lifeline, Enhanced or Tribal Lifeline, and (when it existed) the Affordable Connectivity Program. In addition, SDTA members for many years have been eligible for and received long term financing

¹⁴ TruConnect Application starting at page 12.

¹⁵ TruConnect Discovery Response to SDTA 2-2, 2-3.

through the Rural Utility Service’s lower-interest, telecommunications lending programs. These referenced federal programs have been critical for SDTA member companies, assisting them in meeting their short-term and long-term cost recovery needs (associated with payment of loan obligations on existing network facilities, the maintenance and updating of existing network and related equipment, and at the same time preserving the affordability of the higher quality voice and broadband services offered).

As to the Lifeline program specifically, this program contributed to efforts by SDTA members to ensure their voice and/or broadband services of SDTA members are affordable for low-income users. This program assists with service affordability in two ways. First, the programs provide a direct discount to end users for their voice and/or broadband services. In addition, they increase consumer adoption of these services on a company-wide basis bring a second “affordability” benefit (in the form of a reduced per line or location costs, bringing a benefit to all users of the rural telephone company network). The value of this secondary benefit should not be ignored in the Commission’s public interest review process under the ETC designation provisions. It can be particularly helpful to rural telephone companies operating in the highest cost, lowest density areas.

3. The unique advantages and disadvantages of the applicant’s service offering

TruConnect does not provide services with its own infrastructure, and it has no plans to build or develop infrastructure in South Dakota.¹⁶ TruConnect will not improve, advance or develop how South Dakotans connect to the cellular network or the internet. Rather, TruConnect

¹⁶ TruConnect Application page 3.

simply resells services it obtains from its underlying carriers – T-Mobile and Verizon.¹⁷ SDTA argues the “reseller-only” aspect of TruConnect’s service plan serves as a distinct disadvantage to South Dakota consumers. While it appears from the record that TruConnect has the requisite FCC approval to operate as a reseller only¹⁸, SDTA takes issues with the policies that allow it.¹⁹ SDTA argues the FCC policy that eliminates the requirement that providers advance infrastructure build-out yet allows the provider to utilize the Lifeline program benefits fails rural consumers. The policy fails to advance development of infrastructure that increases connectivity in rural places.

Additionally, the fact that TruConnect’s service is nothing more than the “minimum service standards” imposed by the FCC rules and orders for “Mobile Broadband” is a disadvantage for South Dakota consumers. The minimum service required is: a non-specific mobile broadband speed and a monthly “usage allowance” of only “4.5 GB.”²⁰ In response to

¹⁷ Id.

¹⁸ TruConnect Application page 8 and Discovery Response to SDTA 2-26

¹⁹ Under certain circumstances the FCC chose to eliminate the requirement that providers use their “own facilities.” See 2012 Lifeline and Link Up Reform Order, WC Docket No 11.42.

Specifically, at paragraph 368 the FCC Ordered: “We forbear, on our own motion, from applying the Act’s facilities requirement of section 214(e)(1)(A) to all telecommunications carriers that seek limited ETC designation to participate in the Lifeline program, subject to certain conditions noted below... as a result, the Commission will forbear from the “own-facilities” requirement contained in section 214(e)(1)(A) for carriers that are, or seek to become, Lifeline-only ETCs, subject to the following conditions: (1) the carrier must comply with certain 911 requirements, as explained below; and (2) the carrier must file, and the Bureau must approve, a compliance plan providing specific information regarding the carrier’s service offerings and outlining the measures the carrier will take to implement the obligations contained in this Order as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary. The review and approval of all compliance plans is a critical element of our action today. These conditions will give the states and the Commission the ability to evaluate the Lifeline providers’ offerings to low-income consumers and adherence with program rules before such companies may receive any Lifeline funds.” (emphasis added)

²⁰ TruConnect Application starting on page 16.

SDTA discovery, TruConnect confirmed that it does not allow a roll over of unused monthly voice or data.²¹ Additional data is charged at the following rates²²:

“TOP-UPS”	Price
International Top Up (55 Countries)	\$5
500 MB High Speed Data	\$5
1 GB High Speed Data	\$10
3 GB	\$20
8 GB	\$30

In contrast, the minimum data usage for Lifeline imposed by the FCC on fixed broadband carriers is 1,280 GB and generally, SDTA member companies do not limit data usage. To get a comparable amount of data, a TruConnect user would spend thousands of dollars per month. As previously stated, research indicates the average household consumes 641 GB of broadband data per month.²³ Again, to purchase this level of data, a household will spend thousands of dollars per month. There is nothing affordable or “no cost” about these numbers and the data limitations imposed by TruConnect are a disadvantage of its product. Furthermore, data limits are reason to question TruConnect’s arguments that it will “afford low-income South Dakota residents a wider

²¹ TruConnect Discovery response to SDTA 1-15.

²² TruConnect Application Exhibit 6

²³ OpenVault’s Broadband Insights Report for the fourth quarter of 2023, https://openvault.com/wp-content/uploads/2024/02/OVBI_4Q23_Report_v3.pdf

choice of providers and available services...”²⁴ TruConnect does not offer sufficient data, at a reasonable price, such that it actually impacts consumer choice.

Certain aspects of TruConnect’s plans relating to customer service also present concerns and seem likely to operate as a disadvantage. Other than unspecified and uncertain product distribution/sales relationships with government agencies, retail, and nonprofit partners TruConnect will not have a physical location in South Dakota. As such, consumers cannot get help or support other than through call centers located in California, India, Guatemala and Honduras.²⁵ Furthermore, it appears the complaint process is handled through email.²⁶ The Commission should be concerned about and seek additional information on how TruConnect will overcome the above-named unique disadvantages that come with the TruConnect Lifeline product and TruConnect ETC designation.

4. Commitments made regarding the quality of the telephone service provided by the applicant.

TruConnect seems to lack an understanding of the South Dakota landscape and potential wireless coverage challenges that could lead to service quality issues. In response to SDTA discovery 1-10, TruConnect states that it does not expect any geographic areas within the requested service area (which is the whole state of SD) where consumers may experience service issues due to inadequate coverage by underlying service providers. As any South Dakota resident knows, TruConnect’s confidence is misplaced. In SDTA’s second discovery request 2-11, TruConnect slightly tempers its confidence and acknowledges its service is, “subject to network and transmission limitations, including cell site unavailability, particularly near cell site

²⁴ TruConnect Application page 23.

²⁵ TruConnect Discovery response to SDTA 1-5.

²⁶ Id.

boundaries and in remote areas.” Then, in response to the Commission Staff’s Second Data request, TruConnect writes that “geographic coverage is not synonymous with population coverage...although there are some limitations to the geographic coverage...that does not necessarily result in any households not being able to receive service.”²⁷ SDTA believes this to mean that TruConnect realizes and understands its product will not provide quality service or necessarily even provide coverage in the rural places that South Dakota citizens travel and work²⁸ – the vary places they may rely upon mobile service. Clear, transparent communication from TruConnect to the consumer regarding when and where the mobile device can be expected to work is essential. A statewide certification from this Commission does not help consumers understand what can be expected regarding the quality of TruConnect’s service.

Along with TruConnect’s answers to Staff’s Second Data Requests, the company filed a new map to identify where it will have limited and where it will have no coverage. TruConnect does not share how it defines “limited” coverage. It is therefore impossible to determine the accuracy of this map. Regardless, and what is more concerning, TruConnect does not plan to inform consumers of its limitations prior to enrolling the consumer to take service. Rather, the company has a “reactive” plan only after a consumer experiences problems.²⁹ Only then, will the call centers located in California, India, Guatemala and Honduras try to problem solve a rural South Dakota resident’s coverage issue. South Dakota citizens deserve more from a company seeking certification to provide lifeline services, a service designed to provide financially stressed individuals with access to potentially lifesaving connectivity.

²⁷ TruConnect response to Commission Staff Discovery 2-4.

²⁸ For some South Dakotan’s “work” occurs in a field or pasture, not in a population center.

²⁹ TruConnect response to Commission Staff Discovery 2-4.

SDTA asserts consumers must be made aware of the capacity and other possible quality-of-service limitations that are very likely to come with the TruConnect product. When consumers choose a wireless Lifeline product, they give up the opportunity for a wired Lifeline product that does not share the same quality-of-service problems. Consumers must be given the opportunity to cancel wireless service if the wireless service is not meeting his or her needs, without high pressure sales tactics and without penalties or fees.³⁰

Finally, it is in South Dakota consumers' best interest to have the Commission as a resource to resolve concerns and complaints if or when issues do arise. SDTA recommends that if the Commission grants Lifeline ETC designation to TruConnect, the Commission should require the company to provide a direct telephone contact as a resource for the Commission Consumer Affairs Staff in the event complaints or concerns are received by the Commission.

5. The Applicant's ability to provide the supported services throughout the designated service area.

TruConnect's application is deficient regarding its requested ETC service area and its commitment to serve within that service area. The company requests, "ETC designation that is statewide in scope..."³¹ However, at the same time, it acknowledges that it cannot provide services statewide.³² TruConnect fails to demonstrate it can provide services throughout the requested service area, which SDTA believes to be the entire state. As a result, the Application as it is written, should be denied. In support, SDTA asserts:

- The map filed in response to Commission Staff's Second Data Request identifies zip codes where "limited coverage" and "service not provided." It is contrary to law and

³⁰ TruConnect response to SDTA Discovery 1-10.

³¹ TruConnect Application page 10.

³² TruConnect responses to Commission Staff's Second Discovery Request.

- policy to grant TruConnect ETC designation for areas that it can't reliably serve. At a bare minimum, TruConnect should amend its application to remove the "limited coverage" and "service not provided" zip codes from its ETC Certification request.
- ARSD 20:10:32.43(3) is not met: TruConnect has not clearly identified the service area in which it desires ETC designation. Rather, it provides contradictory information requesting statewide designation yet excluding portions of the state from the map that accompanies Commission Staff's Second Data Request Answers. Throughout the application, TruConnect asserts its desire to serve only in areas "where underlying facilities are available."³³ If "underlying facilities" are not available statewide (which they are not), then certification should not be granted state-wide. As written, considering all supporting information in the docket, TruConnect has not clearly identified a service area. The Applicant has not met its burden and its application, as written, should be denied.
 - ARSD 20:10:32.43.01 and 20:10:32:43.07 are not met: Given the inadequate information, regarding the desired ETC designation/certification area, TruConnect cannot and did not prove a commitment and ability to fulfill all reasonable requests for service within the ETC designated area within a reasonable timeframe. The Commission must have a means by which to hold TruConnect accountable. TruConnect must have a means by which to determine where and who it must serve within the state of South Dakota. TruConnect's vague request for ETC designation statewide wherever "underlying facilities are available" is not sufficient and should be denied.

³³ TruConnect Application page 11.

- ARSD 20:10:32:43.01(2): TruConnect should not be granted ETC designation for known areas of “limited coverage,” then later escape from the obligation to provide service by declaring a consumers request to cause “excessive or unreasonable cost.”

It is fair, equitable and consistent with law and policy for this Commission to require TruConnect identify where in South Dakota (by zip codes or other means) that it can and will commit to serve “all customers making a reasonable request.” ARSD 20:10:32:43.01. It is not this Commission’s job to sleuth through the filing and attempt to guess where in South Dakota the company can reliably provide service. The Application, as submitted, should be denied.

Conclusion

The Commission should deny the request for ETC designation because of application deficiencies. Specifically: TruConnect failed to adequately identify the requested ETC service area and failed to demonstrate a commitment and ability to provide service throughout the requested ETC designation area.

If TruConnect cures the above application deficiencies, then the Commission should consider collection of the following information before it makes a final decision regarding ETC designation:

- 1) Details regarding how TruConnect Lifeline traffic is prioritized on underlying provider networks.
- 2) Details regarding when and how TruConnect Lifeline Consumers can expect the speed, reliability, or quality of their wireless service to be impacted by traffic prioritization on underlying networks.
- 3) Details regarding how consumers are informed regarding the limitations that come with the speed and data offered by TruConnect and the cost of additional data.

If TruConnect cures the above application deficiencies, and the Commission grants TruConnect's request for limited ETC designation for the purpose of Lifeline, SDTA requests the Commission's Order include the following conditions:

- 1) ETC designation should be conditioned upon the representations and commitments made by TruConnect both in writing and orally at any future Commission meeting. SDTA Discovery request and TruConnect Answers are attached as Exhibit A.
- 2) TruConnect must provide new customers with notice that they may cancel service at any time without penalties or fees.
- 3) The Commission should be a resource for consumers and TruConnect in cases of consumer complaints and TruConnect must provide the Commission with direct contact for a TruConnect representative that has authority to resolve consumer complaints or concerns.
- 4) ETC designation should be limited to specific service territories wherein all public interest requirements are met. TruConnect's vague request regarding the ETC designated service territory should be rejected. The ETC designation service territory should be shown on a detailed map, publicly available in the docket.
- 5) TruConnect should be restricted from modifying its service territory in any way without prior approval from the Commission, through a docket filing.
- 6) TruConnect should provide an annual report to the Commission that includes:
 - a. A record of all TruConnect South Dakota Lifeline customer internal complaints.
 - b. A record of all retail non-profit, local and/or state agency partners used by TruConnect to communicate with prospective South Dakota customers and/or enroll South Dakota customers.

Dated this 19th day of September, 2024.

/s/ Kara Semmler

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CERTIFICATE OF SERVICE

I hereby certify that an original of SDTA Comments dated September 19, 2024, filed in PUC Docket TC24-004 was served upon the PUC electronically, directed to the attention of:

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Dated this 19th day of September, 2024.

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