

BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

Application of Sage Telecom
Communications, LLC d/b/a TruConnect
to Expand Its Eligible Telecommunications
Carrier Service Area

Docket No. 23-SAGT-_____

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

I. INTRODUCTION

Sage Telecom Communications, LLC d/b/a TruConnect (Sage or the Company), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the Act),¹ Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (FCC)² and the Kansas Corporation Commission (Commission) rules and regulation, hereby files this application to expand Sage's Eligible Telecommunications Carrier (ETC) service area in the State of Kansas (Application). The Commission designated Sage as a wireless ETC by an Order dated June 14, 2013, in Docket No. 13-SAGT-407-ETC.³ On August 19, 2014, the Commission granted Sage's application to expand its ETC service area.⁴ Sage requests to further expand its ETC service area to provide Lifeline service to additional

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R. §§ 54.101-54.207.

³ *Application of Sage Telecom, Inc. for Designation as an Eligible Telecommunications Carrier for the Limited Purpose of Offering Wireless Lifeline Service to Qualified Households*, Order Granting in Part and Denying in Part Application Requesting Eligible Telecommunications Carrier Designation, Docket No. 13-SAGT-407-ETC (ETC Designation Order).

⁴ *Application of Sage Telecom Communications, LLC to Expand Its Eligible Telecommunications Carrier Service Area*, Order Granting in Part and Denying in Part Application to Expand Eligible Telecommunications Carrier Service Area. Docket No. 14-SAGT-463-ETC (August 19, 2014) (ETC Expansion Order).

qualifying Kansas households. Specifically, Sage seeks to expand its ETC designated service area to include additional wire centers within the wireless network coverage of its underlying carriers that were not included in its ETC designation. The Company does not seek access to Universal Service Fund support for the purpose of providing service to high-cost areas.

As demonstrated herein, and as certified in attached Exhibit 1, Sage continues to meet all applicable statutory and regulatory requirements for designation as an ETC.⁵ The Commission's grant of Sage's Application would advance the public interest by enabling the Company to expand the availability of Lifeline service to substantially more low-income consumers in Kansas. Accordingly, Sage respectfully requests that the Commission expeditiously approve this Application.

All correspondence, communications, pleadings, notices, orders, and decisions relating to this Application should be addressed to:

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⁵ See *Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket Nos. 11-42 and 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) (*2012 Lifeline Reform Order*); *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42 et al., Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016); *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, and 09-197, Order on Reconsideration, Memorandum Opinion and Order, FCC 17-155 (rel. Dec. 1, 2017); *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, and 09-197, Fifth Report and Order and Memorandum Opinion and Order and Order on Reconsideration, FCC 19-111 (rel. Nov. 14, 2019).

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II. DESIGNATED SERVICE AREA

In the ETC Designation Order, the Commission designated Sage as an ETC to provide wireless Lifeline service in two incumbent local exchange carrier (ILEC) wire centers: La Harpe (La Harpe Telephone Company, Inc.) and Garden Plain (Southwestern Bell Telephone Company).⁶ In the ETC Expansion Order, the Commission designated Sage as an ETC in the wire centers listed in Attachment A to the Commission Staff’s Report and Recommendation.⁷ At the time the Commission issued the ETC Expansion Order, Sage’s underlying carriers were Verizon Wireless (Verizon) and Sprint Spectrum L.P. (Sprint).⁸

Since the date of the ETC Expansion Order, the coverage area of Sage’s underlying carriers has expanded. In order to best serve its customers and provide quality service and coverage throughout Kansas, Sage seeks to expand its ETC service area to match its expanded service area within Kansas. Sage customers will continue to benefit from its underlying carriers’

⁶ See ETC Designation Order, at 13.

⁷ See ETC Expansion Order, at 13 (designating Sage as an ETC “in the service areas listed on Attachment A to Staff’s Report and Recommendation”). The service areas in Attachment A included ILEC and Regional Bell Operating Company (RBOC) wire centers.

⁸ In 2020, Sprint and T-Mobile merged to form T-Mobile US, Inc. By April 2022, Sage customers using the Sprint network were transitioned to T-Mobile. Service that had previously been provided on Sprint’s network is now provided on T-Mobile’s network.

ability to remain functional in emergency situations, including access to a reasonable amount of back-up power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations.

Sage seeks to revise its ETC designated service area to include additional wire centers within the wireless network coverage of its underlying carriers, including as that network coverage may change or expand going forward. For the Commission's reference, a list of the ILEC and RBOC wire centers associated with Sage's expanded ETC service area is attached as Exhibit 2. Exhibit 2 only includes wire centers within Verizon's service area that Sage seeks to add to its ETC service area.

III. SAGE MEETS APPLICABLE REQUIREMENTS

The FCC's rules set forth the information that must be contained in an application for ETC designation.⁹ In its initial ETC application and its application to expand its ETC service area, both incorporated herein by reference, Sage provided all the information required by the FCC's rules in effect at the time, including those set forth in the *2012 Lifeline Reform Order*. The Commission found in its ETC Designation Order and ETC Expansion Order, that Sage met the requirements for designation as an ETC. Sage has complied with the conditions in the ETC Designation Order and ETC Expansion Order and will continue to do so. In accordance with 47 C.F.R. § 54.202(a)(1)(i) and as certified to in the attached verification, Sage will comply with the service requirements applicable to the support that it receives. Sage provides the following additional information to address FCC rules governing the Lifeline program that were amended after the Company's ETC Designation Order and ETC Expansion Order were issued.

⁹ See 47 C.F.R. §§ 54.101 - 54.207.

A. Sage Will Continue to Provide All Supported Services

Sage will continue to provide all supported services required by Section 54.101(a) of the FCC's Rules¹⁰ throughout its requested service area in the State of Kansas, including voice telephone service and broadband Internet access service. Sage commits that its Lifeline-supported services will continue to meet or exceed the minimum service standards set forth in 47 C.F.R. § 54.408, including as they change going forward. The Company's current Lifeline offering is attached as Exhibit 3, and its Terms and Conditions are available on its website.¹¹ Sage currently offers these Lifeline wireless plans throughout its existing service area in Kansas.

B. Sage's Processes Comply with the Lifeline Verification and Enrollment Requirements, and the Company Remains Committed to Preventing Waste, Fraud and Abuse of the Lifeline Program

Section 54.410 of the FCC's rules requires ETCs to certify and verify a Lifeline customer's initial and continued eligibility. Sage has processes in place to facilitate compliance with federal customer enrollment requirements. Specifically, the Company relies on the National Verifier and the National Lifeline Accountability Database (NLAD), each of which is administered by the Universal Service Administrative Company (USAC), to determine an applicant's eligibility for Lifeline service (except in Texas, where the Company follows specific state requirements). Every applicant is required to complete the standardized Lifeline application in the National Verifier environment, which covers the necessary information collection, disclosures, and certifications required by Section 54.410(d) of the Lifeline rules.¹² For applicants verified as being eligible by USAC's National Verifier and NLAD, Sage

¹⁰ 47 C.F.R. § 54.101(a).

¹¹ See <https://www.truconnect.com/terms-and-conditions>.

¹² 47 C.F.R. § 54.410(d).

completes enrollment by transmitting the required information into NLAD as required by Section 54.404(b)(6) of the FCC's rules. Sage also: (1) informs customers of the need to use the service at least once every thirty (30) days as required by Section 54.407(c)(2); (2) provides notice to customers after 30 days of non-usage that they must use the service within 15 days or their service will be terminated as required by Section 54.405(e)(3); and (3) requires customers to activate their Lifeline service as required by Section 54.407(c)(1). Sage does not provide a customer with a handset (if the customer qualifies for a free handset) or otherwise activate Lifeline service until the applicant completes the application in the National Verifier and receives eligibility approval.¹³

Sage has additional processes in place to guard against waste, fraud, and abuse, and to ensure compliance with FCC rules designed to achieve that objective, including customer usage, cure period, and de-enrollment requirements set forth in Sections 54.407(c)(2) and 54.405(e)(3), general notice and de-enrollment requirements set forth in Section 54.405(e)(1), transmission of information to NLAD and recordkeeping requirements set forth in Sections 54.404(b)(6) and 54.417, annual certification and reporting requirements set forth in Sections 54.416 and 54.420, and reimbursement claims processes established by USAC consistent with Sections 54.403 and 54.407(a). Sage also complies with Sections 54.410(f) of the FCC's rules governing annual subscriber re-certification of eligibility and coordinates with USAC's National Verifier and NLAD systems to manage additional de-enrollments related to USAC-administered benefit transfers and failure to re-certify.¹⁴ If Sage receives a request for de-enrollment from a

¹³ 47 C.F.R. § 54.410(a).

¹⁴ 47 C.F.R. §§ 54.405(e), 54.410(f).

subscriber, it processes the request within two (2) business days in accordance with Section 54.405(e)(5).

Sage has direct contact with all applicants for its Lifeline service, either in person through its employees, agents, or representatives, or via SMS messaging, the telephone, mail, or online. In addition, in accordance with Section 54.406 of the FCC's rules, Sage's enrollment representatives are required to register in USAC's Representative Accountability Database.

Finally, Sage provides or requires Lifeline-specific training for all personnel, whether employees, direct contractors, or representatives, who interact with new or prospective customers regarding the FCC's Lifeline eligibility and certification rules and the Company's practices and policies designed to implement those rules. Sage has a zero-tolerance policy for waste, fraud, and abuse, and personnel are instructed to notify the Company's compliance team if they suspect that anyone might be providing false information or attempting to obtain a duplicate Lifeline benefit.

IV. EXPANSION OF SAGE'S ETC SERVICE AREA WOULD PROMOTE THE PUBLIC INTEREST

In its ETC Designation Order, the Commission found that designation of Sage as an ETC would serve the public interest. Similarly, expansion of Sage's ETC service area to include all areas where its underlying carriers have coverage will serve the public interest by increasing the number of low-income households that can benefit from the Company's high quality mobile voice, text, and data services. Sage's online and in-person, real-time distribution methods, which rely upon Internet-enabled compliance checks, will enable the Company to bring Lifeline service to eligible consumers throughout its expanded service area. Moreover, Sage's Lifeline rate plans allow feature-rich mobile connectivity for qualifying subscribers at low cost to subscribers without the burden of credit checks or contracts.

The Commission's grant of Sage's request to expand its designated service area also would promote competition and increase customer choice for low-income households residing in the expanded service area. Indeed, its presence as a competitor will lead to additional competition within the Lifeline market, especially throughout its expanded service area, that should help improve the rate of program participation by eligible subscribers. For the foregoing reasons, grant of this Application is in the public interest.

V. CONCLUSION

Based on the foregoing, Sage respectfully requests that the Commission promptly grant this Application and expand Sage's Lifeline-only ETC service area to include all wire centers within the wireless network coverage of its underlying carriers.

Respectfully submitted,



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*Counsel for Sage Telecom Communications, LLC
d/b/a TruConnect*

October 10, 2023

Exhibit 1

VERIFICATION

I, Nathan Johnson, Co-Chief Executive Officer of Sage Telecom Communications, LLC d/b/a TruConnect (Sage) am authorized to sign this verification on behalf of Sage. I have reviewed the facts set forth in the foregoing application and verify that facts relating to Sage are true and correct to the best of my knowledge, information, and belief and that I expect to be able to prove the same at any hearing held in this matter. I further certify that Sage will comply with the service requirements applicable to the low-income universal service support it receives.

Date: 9/27/2023

DocuSigned by:

3287E0CD9AF948E...
Nathan Johnson

Exhibit 2

Exhibit 2 - Expansion Coverage Area

Exchange	ILEC
ABBYVPLVN	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
AGENDA	J.B.N. TELEPHONE CO., INC.
AGRA	RURAL TELEPHONE SERVICE CO., INC.
ALDEN	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
ALEXANDER	GOLDEN BELT TELEPHONE ASSOCIATION, INC.
ALLEN	S & A TELEPHONE CO., INC.
ALMA	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
ALTA VISTA	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
ALTAMONT	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
ALTON	RURAL TELEPHONE SERVICE CO., INC.
ALTOONA	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
AMERICUS	BLUESTEM TELEPHONE COMPANY
ARCADIA	CRAW - KAN TELEPHONE COOPERATIVE, INC. - KANSAS
ARGONIA	HAVILAND TELEPHONE CO., INC.
ARLINGTON	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
ARMA	CRAW - KAN TELEPHONE COOPERATIVE, INC. - KANSAS
ASSARIA	HOME TELEPHONE CO., INC. KS
ATHOL	RURAL TELEPHONE SERVICE CO., INC.
ATLANTA	SOUTHERN KANSAS TELEPHONE CO., INC.
AURORA	TWIN VALLEY TELEPHONE, INC.
AXTELL	BLUE VALLEY TELE-COMMUNICAITONS, INC.
BALDWIN	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
BARNARD	TWIN VALLEY TELEPHONE, INC.
BARNES	J.B.N. TELEPHONE CO., INC.
BARTLETT	CRAW - KAN TELEPHONE COOPERATIVE, INC. - KANSAS
BAZINE	GOLDEN BELT TELEPHONE ASSOCIATION, INC.
BEATTIE	BLUE VALLEY TELE-COMMUNICAITONS, INC.
BEAUMONT	SOUTHERN KANSAS TELEPHONE CO., INC.
BEELER	GOLDEN BELT TELEPHONE ASSOCIATION, INC.
BELLEPLAIN	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
BELPRE	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
BENDENA	RAINBOW TELECOMMUNICATIONS ASSOCIATION, INC.
BENEDICT	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
BEVERLY	TWIN VALLEY TELEPHONE, INC.
BIG BOW	PIONEER TELEPHONE ASSOCIATION, INC.
BISON	GOLDEN BELT TELEPHONE ASSOCIATION, INC.
BLUE MOUND	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
BLUFF CITY	KANOKLA TELEPHONE ASSOCIATION
BRAZILTON	CRAW - KAN TELEPHONE COOPERATIVE, INC. - KANSAS
BRONSON	CRAW - KAN TELEPHONE COOPERATIVE, INC. - KANSAS
BROOKVILLE	WILSON TELEPHONE CO., INC.
BROWNELL	GOLDEN BELT TELEPHONE ASSOCIATION, INC.
BUCKEYE	TRI - COUNTY TELEPHONE ASSOCIATION, INC.
BUCYRUS	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
BUFFALO	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
BUHLER	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
BURDEN	SOUTHERN KANSAS TELEPHONE CO., INC.
BURDETT	GOLDEN BELT TELEPHONE ASSOCIATION, INC.
BURLINGAME	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
BURR OAK	RURAL TELEPHONE SERVICE CO., INC.
BURRTON	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
CAMBRIDGE	SOUTHERN KANSAS TELEPHONE CO., INC.
CARLTON	TRI - COUNTY TELEPHONE ASSOCIATION, INC.
CASSODAY	WHEAT STATE TELEPHONE, INC.
CAWKERCITY	CUNNINGHAM TELEPHONE CO., INC.
CEDARPOINT	BLUESTEM TELEPHONE COMPANY
CENTRALIA	BLUE VALLEY TELE-COMMUNICAITONS, INC.
CENTROPOLS	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK

Exchange	ILEC
CHEROKEE	CRAW - KAN TELEPHONE COOPERATIVE, INC. - KANSAS
CIMARRON	UNITED TELEPHONE ASSOCIATION, INC.
CIRCLEVL	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
CLAFLIN	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
CLEARWATER	SOUTHERN KANSAS TELEPHONE CO., INC.
CLIFTON	TWIN VALLEY TELEPHONE, INC.
CLYDE	TWIN VALLEY TELEPHONE, INC.
COATS	HAVILAND TELEPHONE CO., INC.
COLONY	CRAW - KAN TELEPHONE COOPERATIVE, INC. - KANSAS
COLUBSRURL	CRAW - KAN TELEPHONE COOPERATIVE, INC. - KANSAS
COLUMBUS	COLUMBUS TELEPHONE CO.
CONWAY	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
CONWAY SPG	HAVILAND TELEPHONE CO., INC.
COOLIDGE	PIONEER TELEPHONE ASSOCIATION, INC.
COPELAND	UNITED TELEPHONE ASSOCIATION, INC.
CORBIN	KANOKLA TELEPHONE ASSOCIATION
CORNING	J.B.N. TELEPHONE CO., INC.
COUNCILGRV	COUNCIL GROVE TELEPHONE CO.
COURTLAND	RURAL TELEPHONE SERVICE CO., INC.
COYVILLE	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
CRESTLINE	CRAW - KAN TELEPHONE COOPERATIVE, INC. - KANSAS
CUBA	J.B.N. TELEPHONE CO., INC.
CULLISON	HAVILAND TELEPHONE CO., INC.
CUNNINGHAM	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
DAMAR	RURAL TELEPHONE SERVICE CO., INC.
DEERFIELD	PIONEER TELEPHONE ASSOCIATION, INC.
DELIA	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
DELPHOS	TWIN VALLEY TELEPHONE, INC.
DENISON	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
DENMARK	WILSON TELEPHONE CO., INC.
DENTON	RAINBOW TELECOMMUNICATIONS ASSOCIATION, INC.
DEVON	CRAW - KAN TELEPHONE COOPERATIVE, INC. - KANSAS
DEXTER	SOUTHERN KANSAS TELEPHONE CO., INC.
DORRANCE	H & B COMMUNICATIONS, INC.
DOWNNS	RURAL TELEPHONE SERVICE CO., INC.
DUNLAP	TRI - COUNTY TELEPHONE ASSOCIATION, INC.
DURHAM	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
DWIGHT	TRI - COUNTY TELEPHONE ASSOCIATION, INC.
EASTON	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
EDGERTON	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
EDMOND	RURAL TELEPHONE SERVICE CO., INC.
EDNA	CRAW - KAN TELEPHONE COOPERATIVE, INC. - KANSAS
EFFINGHAM	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
ELGIN	TOTAH COMMUNICATIONS, INC.
ELK CITY	TOTAH COMMUNICATIONS, INC.
ELK FALLS	SOUTHERN KANSAS TELEPHONE CO., INC.
ELKHART	ELKHART TELEPHONE CO., INC.
ELLINWOOD	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
ELLIS	GOLDEN BELT TELEPHONE ASSOCIATION, INC.
EMMETT	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
ENGLEWOOD	UNITED TELEPHONE ASSOCIATION, INC.
ENSIGN	UNITED TELEPHONE ASSOCIATION, INC.
ESBON	RURAL TELEPHONE SERVICE CO., INC.
ESKRIDGE	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
EVEREST	RAINBOW TELECOMMUNICATIONS ASSOCIATION, INC.
FAIRVIEW	J.B.N. TELEPHONE CO., INC.
FALL RIVER	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
FARLINGTON	CRAW - KAN TELEPHONE COOPERATIVE, INC. - KANSAS
FONTANA	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
FORD	UNITED TELEPHONE ASSOCIATION, INC.

Exchange	ILEC
FORMOSO	CUNNINGHAM TELEPHONE CO., INC.
FREEPORT	KANOKLA TELEPHONE ASSOCIATION
FULTON	CRAW - KAN TELEPHONE COOPERATIVE, INC. - KANSAS
GALATIA	RURAL TELEPHONE SERVICE CO., INC.
GALENA	EMBARQ MISSOURI, INC. - KS DBA CENTURYLINK - KS
GALESBURG	CRAW - KAN TELEPHONE COOPERATIVE, INC. - KANSAS
GARDNER	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
GARFIELD	GOLDEN BELT TELEPHONE ASSOCIATION, INC.
GAYLORD	RURAL TELEPHONE SERVICE CO., INC.
GENESEO	HOME TELEPHONE CO., INC. KS
GEUDA SPG	KANOKLA TELEPHONE ASSOCIATION
GLASCO	TWIN VALLEY TELEPHONE, INC.
GOESSEL	MOUNDRIDGE TELEPHONE CO.
GOFF	J.B.N. TELEPHONE CO., INC.
GORHAM	GORHAM TELEPHONE CO., INC.
GOVE	RURAL TELEPHONE SERVICE CO., INC.
GREELEY	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
GREEN	TWIN VALLEY TELEPHONE, INC.
GRENOLA	SOUTHERN KANSAS TELEPHONE CO., INC.
GRIDLEY	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
GRINNELL	S & T TELEPHONE COOPERATIVE ASSOCIATION
HADDAM	J.B.N. TELEPHONE CO., INC.
HALLOWELL	CRAW - KAN TELEPHONE COOPERATIVE, INC. - KANSAS
HANSTON	UNITED TELEPHONE ASSOCIATION, INC.
HARDTNER	KANOKLA TELEPHONE ASSOCIATION
HARVEYVL	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
HAVANA	TOTAH COMMUNICATIONS, INC.
HAVEN	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
HAVENSVL	J.B.N. TELEPHONE CO., INC.
HAVILAND	HAVILAND TELEPHONE CO., INC.
HAZELTON	SOUTH CENTRAL TELEPHONE ASSOCIATION, INC.
HEALY	S & T TELEPHONE COOPERATIVE ASSOCIATION
HEPLER	CRAW - KAN TELEPHONE COOPERATIVE, INC. - KANSAS
HEWINS	TOTAH COMMUNICATIONS, INC.
HIATTVILLE	CRAW - KAN TELEPHONE COOPERATIVE, INC. - KANSAS
HIGHLAND	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
HILLSDALE	MO - KAN DIAL, INC.
HOISINGTON	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
HOPE	TRI - COUNTY TELEPHONE ASSOCIATION, INC.
HORTON	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
HOYT	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
HUDSON	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
HUNTER	WILSON TELEPHONE CO., INC.
HURON	RAINBOW TELECOMMUNICATIONS ASSOCIATION, INC.
INGALLS	UNITED TELEPHONE ASSOCIATION, INC.
INMAN	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
IONIA	RURAL TELEPHONE SERVICE CO., INC.
ISABEL	HAVILAND TELEPHONE CO., INC.
JAMESTOWN	CUNNINGHAM TELEPHONE CO., INC.
JOHNSON	PIONEER TELEPHONE ASSOCIATION, INC.
KANORADO	S & T TELEPHONE COOPERATIVE ASSOCIATION
KENDALL	PIONEER TELEPHONE ASSOCIATION, INC.
KINCAID	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
LA CYGNE	PEOPLES TELECOMMUNICATIONS, LLC - KS
LAFONTAINE	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
LAKE CITY	SOUTH CENTRAL TELEPHONE ASSOCIATION, INC.
LAKIN	PIONEER TELEPHONE ASSOCIATION, INC.
LANCASTER	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK

Exchange	ILEC
LANE	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
LANGDON	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
LATHAM	SOUTHERN KANSAS TELEPHONE CO., INC.
LAWTON	CRAW - KAN TELEPHONE COOPERATIVE, INC. - MISSOURI
LEBANON	RURAL TELEPHONE SERVICE CO., INC.
LEBO	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
LEHIGH	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
LEONARDVL	TWIN VALLEY TELEPHONE, INC.
LEOTI	SUNFLOWER TELEPHONE CO., INC.
LEROY	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
LEVANT	S & T TELEPHONE COOPERATIVE ASSOCIATION
LEWIS	GOLDEN BELT TELEPHONE ASSOCIATION, INC.
LIBERTY	TOTAH COMMUNICATIONS, INC.
LINN	BLUE VALLEY TELE-COMMUNICAITONS, INC.
LINWOOD	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
LITTLE RIV	MUTUAL TELEPHONE CO.
LOGAN	RURAL TELEPHONE SERVICE CO., INC.
LONGFORD	TWIN VALLEY TELEPHONE, INC.
LONGISLAND	RURAL TELEPHONE SERVICE CO., INC.
LONGTON	SOUTHERN KANSAS TELEPHONE CO., INC.
LOST SPG	TRI - COUNTY TELEPHONE ASSOCIATION, INC.
LUCAS	WILSON TELEPHONE CO., INC.
LURAY	GORHAM TELEPHONE CO., INC.
LYNDON	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
MACKSVILLE	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
MAHASKA	J.B.N. TELEPHONE CO., INC.
MANTER	PIONEER TELEPHONE ASSOCIATION, INC.
MAPLETON	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
MARIENTHAL	SUNFLOWER TELEPHONE CO., INC.
MATFLDGREN	WHEAT STATE TELEPHONE, INC.
MAYETTA	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
MAYFIELD	KANOKLA TELEPHONE ASSOCIATION
MCCRACKEN	GOLDEN BELT TELEPHONE ASSOCIATION, INC.
MCCUNE	CRAW - KAN TELEPHONE COOPERATIVE, INC. - KANSAS
MCLOUTH	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
MELVERN	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
MENLO	S & T TELEPHONE COOPERATIVE ASSOCIATION
MERIDEN	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
MICHIGNVLY	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
MILFORD	TWIN VALLEY TELEPHONE, INC.
MILTONVALE	TWIN VALLEY TELEPHONE, INC.
MONTEZUMA	UNITED TELEPHONE ASSOCIATION, INC.
MORAN	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
MORGANVL	TWIN VALLEY TELEPHONE, INC.
MORRILL	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
MORROWVL	J.B.N. TELEPHONE CO., INC.
MOSCOW	PIONEER TELEPHONE ASSOCIATION, INC.
MOUND CITY	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
MOUND VLY	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
MULBERRY	CRAW - KAN TELEPHONE COOPERATIVE, INC. - KANSAS
MULLINVL	HAVILAND TELEPHONE CO., INC.
MUNDEN	J.B.N. TELEPHONE CO., INC.
MURDOCK	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
MUSCOTAH	RAINBOW TELECOMMUNICATIONS ASSOCIATION, INC.
NARKA	J.B.N. TELEPHONE CO., INC.
NASHVILLE	HAVILAND TELEPHONE CO., INC.
NATOMA	RURAL TELEPHONE SERVICE CO., INC.
NAVARRE	TRI - COUNTY TELEPHONE ASSOCIATION, INC.
NEOSHO FLS	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK

Exchange	ILEC
NETAWAKA	J.B.N. TELEPHONE CO., INC.
NORTONVL	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
NORWICH	HAVILAND TELEPHONE CO., INC.
OKETO	BLUE VALLEY TELE-COMMUNICAITONS, INC.
OLMITZ	RURAL TELEPHONE SERVICE CO., INC.
OLPE	WHEAT STATE TELEPHONE, INC.
OLSBURG	TWIN VALLEY TELEPHONE, INC.
ONAGA	BLUE VALLEY TELE-COMMUNICAITONS, INC.
OSAGE CITY	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
OSKALOOSA	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
OSWEGO	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
OTIS	GOLDEN BELT TELEPHONE ASSOCIATION, INC.
OVERBROOK	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
OXFORD	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
OZAWKIE	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
PALMER	BLUE VALLEY TELE-COMMUNICAITONS, INC.
PARADISE	GORHAM TELEPHONE CO., INC.
PARKER	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
PARTRIDGE	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
PAXICO	WAMEGO TELEPHONE CO., INC.
PERRY	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
PIEDMONT	SOUTHERN KANSAS TELEPHONE CO., INC.
PIQUA	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
PLEASANTON	CRAW - KAN TELEPHONE COOPERATIVE, INC. - KANSAS
POMONA	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
POTWIN	WHEAT STATE TELEPHONE, INC.
POWHATTAN	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
PRAIRIE VW	RURAL TELEPHONE SERVICE CO., INC.
PRESCOTT	CRAW - KAN TELEPHONE COOPERATIVE, INC. - KANSAS
PRESTON	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
PRETTYPRRI	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
PRINCETON	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
QUENEMO	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
QUINCY	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
RAMONA	TRI - COUNTY TELEPHONE ASSOCIATION, INC.
RANDALL	CUNNINGHAM TELEPHONE CO., INC.
RANTOUL	MO - KAN DIAL, INC.
REECE	SOUTHERN KANSAS TELEPHONE CO., INC.
REPUBLIC	RURAL TELEPHONE SERVICE CO., INC.
REXFORD	RURAL TELEPHONE SERVICE CO., INC.
RICHFIELD	PIONEER TELEPHONE ASSOCIATION, INC.
RICHMOND	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
RILEY	TWIN VALLEY TELEPHONE, INC.
RIVERDALE	HAVILAND TELEPHONE CO., INC.
ROBINSON	RAINBOW TELECOMMUNICATIONS ASSOCIATION, INC.
ROCK	WHEAT STATE TELEPHONE, INC.
ROLLA	PIONEER TELEPHONE ASSOCIATION, INC.
ROSALIA	SOUTHERN KANSAS TELEPHONE CO., INC.
ROSSVILLE	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
ROXBURY	HOME TELEPHONE CO., INC. KS
ROZEL	GOLDEN BELT TELEPHONE ASSOCIATION, INC.
RUSHCENTER	GOLDEN BELT TELEPHONE ASSOCIATION, INC.
RUSSELLSPG	S & T TELEPHONE COOPERATIVE ASSOCIATION
RYUS	PIONEER TELEPHONE ASSOCIATION, INC.
SAFFORDVL	BLUESTEM TELEPHONE COMPANY
SALEMSBURG	HOME TELEPHONE CO., INC. KS
SATANTA	PIONEER TELEPHONE ASSOCIATION, INC.
SAVONBURG	CRAW - KAN TELEPHONE COOPERATIVE, INC. - KANSAS
SAWYER	HAVILAND TELEPHONE CO., INC.

Exchange	ILEC
SCAMMON	EMBARQ MISSOURI, INC. - KS DBA CENTURYLINK - KS
SCRANTON	S & A TELEPHONE CO., INC.
SELDEN	RURAL TELEPHONE SERVICE CO., INC.
SHARON	SOUTH CENTRAL TELEPHONE ASSOCIATION, INC.
SHARON SPG	SUNFLOWER TELEPHONE CO., INC.
SILVERLAKE	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
SIMPSON	CUNNINGHAM TELEPHONE CO., INC.
SOLDIER	J.B.N. TELEPHONE CO., INC.
SOUTH ALMA	CITIZENS TELECOM OF NE LLC DBA FRONTIER COM OF NE
SOUTHHAVEN	KANOKLA TELEPHONE ASSOCIATION
SPEARVILLE	UNITED TELEPHONE ASSOCIATION, INC.
SPRINGHILL	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
ST GEORGE	WAMEGO TELEPHONE CO., INC.
ST JOHN	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
ST MARYS	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
SUMMERFLD	BLUE VALLEY TELE-COMMUNICAITONS, INC.
SUN CITY	SOUTH CENTRAL TELEPHONE ASSOCIATION, INC.
SYLVAN GRV	WILSON TELEPHONE CO., INC.
SYLVIA	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
TESCOTT	TWIN VALLEY TELEPHONE, INC.
THAYER	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
TIMKEN	GOLDEN BELT TELEPHONE ASSOCIATION, INC.
TIPTON	WILSON TELEPHONE CO., INC.
TORONTO	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
TROY	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
TURON	SOUTH CENTRAL TELEPHONE ASSOCIATION, INC.
TYRO	TOTAH COMMUNICATIONS, INC.
UDALL	WHEAT STATE TELEPHONE, INC.
UNIONTOWN	CRAW - KAN TELEPHONE COOPERATIVE, INC. - KANSAS
UTICA	GOLDEN BELT TELEPHONE ASSOCIATION, INC.
VALLEY FLS	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
VERMILLION	BLUE VALLEY TELE-COMMUNICAITONS, INC.
W MINERAL	CRAW - KAN TELEPHONE COOPERATIVE, INC. - KANSAS
WAKEENEY	RURAL TELEPHONE SERVICE CO., INC.
WAKEFIELD	TWIN VALLEY TELEPHONE, INC.
WALDO	GORHAM TELEPHONE CO., INC.
WALDRON	KANOKLA TELEPHONE ASSOCIATION
WALLACE	SUNFLOWER TELEPHONE CO., INC.
WALNUT	CRAW - KAN TELEPHONE COOPERATIVE, INC. - KANSAS
WALTON	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
WATHENA	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
WAVERLY	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
WEBBER	RURAL TELEPHONE SERVICE CO., INC.
WEIR CITY	CRAW - KAN TELEPHONE COOPERATIVE, INC. - KANSAS
WELLSVILLE	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
WESKAN	SUNFLOWER TELEPHONE CO., INC.
WESTMORELD	BLUE VALLEY TELE-COMMUNICAITONS, INC.
WESTPHALIA	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
WETMORE	J.B.N. TELEPHONE CO., INC.
WHEATON	BLUE VALLEY TELE-COMMUNICAITONS, INC.
WHITE CITY	TRI - COUNTY TELEPHONE ASSOCIATION, INC.
WHITECLOUD	UNITED TEL CO. OF KANSAS DBA CENTURYLINK
WHITING	RAINBOW TELECOMMUNICATIONS ASSOCIATION, INC.
WILMORE	HAVILAND TELEPHONE CO., INC.
WILSEY	TRI - COUNTY TELEPHONE ASSOCIATION, INC.
WINCHESTER	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
WINDOM	UNITED TEL OF EASTERN KANSAS DBA CENTURYLINK
WINONA	S & T TELEPHONE COOPERATIVE ASSOCIATION
WOODBINE	TRI - COUNTY TELEPHONE ASSOCIATION, INC.
WOODRUFF	RURAL TELEPHONE SERVICE CO., INC.
WOODSTON	RURAL TELEPHONE SERVICE CO., INC.
ZURICH	RURAL TELEPHONE SERVICE CO., INC.

Exchange	ILEC
ABILENE	SOUTHWESTERN BELL
ALMENA	SOUTHWESTERN BELL
ANDALE	SOUTHWESTERN BELL
ANTHONY	SOUTHWESTERN BELL
ATCHISON	SOUTHWESTERN BELL
ATTICA	SOUTHWESTERN BELL
BASEHOR	SOUTHWESTERN BELL
BENTON	SOUTHWESTERN BELL
BIRD CITY	SOUTHWESTERN BELL
BLRP-WTVL	SOUTHWESTERN BELL
BONNER SPG	SOUTHWESTERN BELL
BUCKLIN	SOUTHWESTERN BELL
BURNS	SOUTHWESTERN BELL
CANEY	SOUTHWESTERN BELL
CANTON	SOUTHWESTERN BELL
CEDAR VALE	SOUTHWESTERN BELL
CHAPMAN	SOUTHWESTERN BELL
CHASE	SOUTHWESTERN BELL
CHENEY	SOUTHWESTERN BELL
CHERRYVALE	SOUTHWESTERN BELL
CHETOPA	SOUTHWESTERN BELL
CLINTON	SOUTHWESTERN BELL
COLDWATER	SOUTHWESTERN BELL
COTONWDFLS	SOUTHWESTERN BELL
DE SOTO	SOUTHWESTERN BELL
DOUGLASS	SOUTHWESTERN BELL
ELWOOD	SOUTHWESTERN BELL
ERIE	SOUTHWESTERN BELL
EUDORA	SOUTHWESTERN BELL
FLORENCE	SOUTHWESTERN BELL
FOWLER	SOUTHWESTERN BELL
FRANKFORT	SOUTHWESTERN BELL
GARDEN PL	SOUTHWESTERN BELL
GODDARD	SOUTHWESTERN BELL
GREENSBURG	SOUTHWESTERN BELL
GYPSUM	SOUTHWESTERN BELL
HALSTEAD	SOUTHWESTERN BELL
HAMILTON	SOUTHWESTERN BELL
HANOVHRNBG	SOUTHWESTERN BELL
HARPER	SOUTHWESTERN BELL
HARTFORD	SOUTHWESTERN BELL
HERINGTON	SOUTHWESTERN BELL
HERNDON	SOUTHWESTERN BELL
HOWARD	SOUTHWESTERN BELL
HUMBOLDT	SOUTHWESTERN BELL
JEWELL	SOUTHWESTERN BELL
KINSLEY	SOUTHWESTERN BELL
LA CROSSE	SOUTHWESTERN BELL
LECOMPTON	SOUTHWESTERN BELL
LEON	SOUTHWESTERN BELL
LINCOLN	SOUTHWESTERN BELL
MANKATO	SOUTHWESTERN BELL
MARQUETTE	SOUTHWESTERN BELL
MCDONALD	SOUTHWESTERN BELL
MEADE	SOUTHWESTERN BELL
MINNEOLA	SOUTHWESTERN BELL
MOLINE	SOUTHWESTERN BELL
MOUNT HOPE	SOUTHWESTERN BELL
NEWTON	SOUTHWESTERN BELL

Exchange	ILEC
NICKERSON	SOUTHWESTERN BELL
NORCATUR	SOUTHWESTERN BELL
OLATHE	SOUTHWESTERN BELL
PAWNEEROCK	SOUTHWESTERN BELL
PEABODY	SOUTHWESTERN BELL
PLAINS	SOUTHWESTERN BELL
PLAINVILLE	SOUTHWESTERN BELL
PROTECTION	SOUTHWESTERN BELL
READING	SOUTHWESTERN BELL
SCANDIA	SOUTHWESTERN BELL
SCOTT CITY	SOUTHWESTERN BELL
SEDAN	SOUTHWESTERN BELL
SEVERY	SOUTHWESTERN BELL
SMITH CTR	SOUTHWESTERN BELL
SOLOMON	SOUTHWESTERN BELL
ST PAUL	SOUTHWESTERN BELL
STAFFORD	SOUTHWESTERN BELL
STOCKTON	SOUTHWESTERN BELL
SUBLETTE	SOUTHWESTERN BELL
TOWANDA	SOUTHWESTERN BELL
TREECE	SOUTHWESTERN BELL
WASHINGTON	SOUTHWESTERN BELL
WILLIAMSBG	SOUTHWESTERN BELL
YATES CTR	SOUTHWESTERN BELL

Exhibit 3

KANSAS LIFELINE OFFERING

LIFELINE PLANS	VOICE	TEXT (SMS)	DATA High Speed	Free International Calling	Lifeline Price
Lifeline Only	Unlimited	Unlimited	4.5 GB	Canada, Mexico, China, Vietnam, South Korea	\$0.00

“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

All packages include:

- Free calls to TruConnect Customer Service
- Free calls to 611 services
- Free calls to 911 emergency services
- Free access to Voicemail, Caller-ID, and Call Waiting features
- Voice minutes may be used for Domestic Long Distance at no extra cost
- Free SIM Card