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July 2, 2024

VIA ELECTRONIC FILING

Fiscal Division
Kansas Corporation Commission
1500 S.W. Arrowhead Road
Topeka, Kansas 66604-4027
(785) 271-3351

Re: Docket No. 24-GIMT-612-GIT; Annual Certification
Sage Telecom Communications, LLC

Dear Sir/Madam:

Attached please find for filing in the above referenced docket Sage Telecom Communications, LLC's Eligible Telecommunications Carrier Annual Certification. The 2024 deadline for the FCC Form 481 has been waived. Sage Telecom Communications, LLC will file a copy of the FCC Form 481 pursuant to 47 C.F.R. 54.422 when certification becomes available.

If you have any questions regarding this filing, please contact me at 770-232-9200 or etc@telecomcounsel.com.

Respectfully submitted,

s/Rachael Sears

Rachael Sears, Regulatory Specialist
Expert Telecom Compliance

Attachments

BEFORE THE KANSAS CORPORATION COMMISSION

| | | |
|----------------------------------------------|---|----------------------------|
| In the Matter of Certification of Compliance |) | |
| with Section 254(e) of the Federal |) | |
| Telecommunications Act of 1996 and |) | Docket No. 24-GIMT-612-GIT |
| Certification of Appropriate Use of Kansas |) | |
| Universal Service Fund Support |) | |

SAGE TELECOM COMMUNICATIONS, LLC’S ANNUAL CERTIFICATION

Sage Telecom, Inc. was designated as an eligible telecommunications carrier (“ETC”) by the Kansas Corporation Commission (“Commission”) for federal and KUSF support purposes in Docket No. 03-SAGT-867-ETC by order dated October 9, 2003. On July 9, 2013 in Docket No. 13-SAGT-619-CCN, Sage Telecom, Inc. was granted approval to revise its ETC designation to reflect the pro forma internal structural change and name change to Sage Telecom Communications, LLC (“Sage”). Sage submits the following in accordance with the Order issued on March 21, 2024 in this Docket (“Order”), and respectfully requests that the Commission certify the Company’s continued eligibility to receive federal low income and KUSF support. Attachments 1 and 5 of the Order, attached hereto as Exhibit A, are the only attachments applicable to Sage. The 2024 FCC Form 481 deadline has been waived; Sage will provide a copy to the Commission once available.

Respectfully submitted,



Lance J.M. Steinhart
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E-Mail: lsteinhart@telecomcounsel.com

Attorneys for Sage Telecom Communications, LLC

July 2, 2024

Exhibit A

Attachments 1 and 5

**THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

Before Commissioners: Andrew J. French, Chairperson
 Dwight D. Keen, Commissioner
 Annie Kuether, Commissioner

In the Matter of Certification of Compliance)
with Section 254(e) of the Federal)
Telecommunications Act of 1996 and) Docket No. 24-GIMT-612-GIT
Certification of Appropriate Use of Kansas)
Universal Service Fund Support.)

**SECTION 254(e) CERTIFICATION
FEDERAL HIGH-COST UNIVERSAL SERVICE SUPPORT
FCC Docket Reference: CC Docket No. 96-45
and KANSAS UNIVERSAL SERVICE FUND SUPPORT
(Please type or print legibly)
(Circle all Federal and Kansas Support Received)**

1. My title is Co-CEO of Sage Telecom Communications, LLC (Company/Cooperative). In this capacity, I am in a position of authority to direct how federal high-cost Universal Service Fund (USF), including Legacy or Frozen high-cost Loop support (HCL/FHCS), Safety Valve support (SVS), Connect America Cost Model (CACM) support, Connect America Fund (CAF I/CAF II) support, Alternative Connect America Cost Model (A-CAM/ACAM II) support, Rural Broadband Experiment support (RBE), Rural Digital Opportunity Fund (RDOF) support, and/or Kansas Universal Service Fund (KUSF) support received will be used and by this certification I am binding Sage Telecom Communications, LLC (Company/Cooperative) to the statements made in this certification.

2. Sage Telecom Communications, LLC (Company/Cooperative) was named as an Eligible Telecommunications Carrier (ETC) by the Kansas Corporation Commission (KCC) for federal support purposes in Docket No. 03-SAGT-867-ETC by order dated October 9, 2003, and KUSF support purposes in Docket No. 03-SAGT-867-ETC by order dated October 9, 2003.

3. By this affidavit, I certify that all federal high-cost USF, including HCL, FHCS, SVS, CAF I/CAF II, A-CAM/ACAM II, RBE, RDOF, and/or KUSF received by Sage Telecom Communications, LLC

**Docket No. 24-GIMT-612-GIT
Attachment 1**

(Company/Cooperative) was used in the proceeding calendar year 2023 and will be used in the new calendar year 2025 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with Section 254(e) of the Federal Telecommunications Act, and/or Kansas statutes and KCC requirements.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct.

(Pursuant to Kan. Stat. Ann. 53-601.)

DocuSigned by:


Signature 8087E0CD9AF948E...

Nathan R. Johnson
Printed/Typed Name

Executed on 6/11/2024 date.

Email address: njohnson@truconnect.com

**Annual ETC Certification of Requirements Imposed by the
Commission in Docket Number 06-GIMT-446-GIT**

1. Did your company experience any outage in the prior calendar year, as that term is defined in 47 C.F.R. § 4.5, of at least 30 minutes in duration for each service area in which an Eligible Telecommunications Carrier is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affect: (i) at least 10% of the end users served in a designated service area; or (ii) a 911 specialty facility as defined in 47 C.F.R. § 4.5(e)?

(Yes/No) No. IF YES, PLEASE COMPLETE THE FOLLOWING:

| Date and time of Onset of the Outage | Description of the Outage and its Resolution | Particular services affected | Geographic Areas Affected | Steps Taken to Prevent a Similar Situation in the Future | Number of Customers Affected |
|--------------------------------------|----------------------------------------------|------------------------------|---------------------------|----------------------------------------------------------|------------------------------|
| | | | | | |

(If necessary, please provide additional pages.)

2. Please provide the number of requests for service from potential customers within the recipient’s service areas that were unfulfilled during the prior calendar year. If applicable, please explain how your company attempted to provide service to those potential customers.

The Company is not aware of any unfulfilled requests for service from Lifeline eligible customers in the prior calendar year.

3. Please provide the number of complaints per 1,000 connections (fixed or mobile) in the prior calendar year.

0 _____

**24-GIMT-612-GIT
Attachment 5**

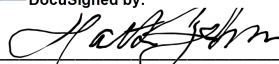
4. A wireline ETC must certify that it is in compliance with the Commission’s quality of service standards and a wireless ETC must certify that it is in compliance with the CTIA Code. Please complete the following, as applicable to your company:

**QUALITY OF SERVICE WIRELINE ANNUAL CERTIFICATION
KCC Docket Reference: 06-GIMT-446-GIT
(Please type or print legibly)**

1. My title is Co-CEO of the Sage Telecom Communications, LLC (Company/Cooperative). In this capacity, I am in a position of authority to certify whether the Company/Cooperative is complying with required quality of service standards. I am binding Sage Telecom Communications, LLC (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that Sage Telecom Communications, LLC (Company/Cooperative) is in compliance with the Commission’s quality of service standards as adopted in Docket No. 191,206-U.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on 06/11/2024 (date).

DocuSigned by:

Signature
3852B24E-1AC3-4665-8226-65E279F64A20

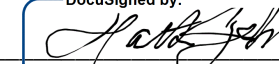
Nathan R. Johnson
Printed/Typed Name

**QUALITY OF SERVICE WIRELESS ANNUAL CERTIFICATION
KCC Docket Reference: 06-GIMT-446-GIT
(Please type or print legibly)**

1. My title is Co-CEO of the Sage Telecom Communications, LLC (Company/Cooperative). In this capacity, I am in a position of authority to certify whether the Company/Cooperative is complying with required quality of service standards. I am binding Sage Telecom Communications, LLC (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that Sage Telecom Communications, LLC (Company/Cooperative) is in compliance with the CTIA Code.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on 06/11/2024 (date).

DocuSigned by:

Signature
3852B24E-1AC3-4665-8226-65E279F64A20

Nathan R. Johnson
Print / Typed Name

**24-GIMT-612-GIT
Attachment 5**

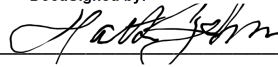
5. Each ETC must certify that it will be able to function in an emergency as set forth in 47 C.F.R § 54.202(a)(2).

**ABILITY TO FUNCTION IN AN EMERGENCY ANNUAL CERTIFICATION
KCC Docket Reference: 06-GIMT-446-GIT
(Please type or print legibly)**

1. My title is Co-CEO of the Sage Telecom Communications, LLC (Company/Cooperative). In this capacity, I am in a position of authority to certify whether the Company/Cooperative is able to function in an emergency. I am binding Sage Telecom Communications, LLC (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that Sage Telecom Communications, LLC (Company/Cooperative) is capable of functioning in an emergency.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on 06/11/2024 (date).

DocuSigned by:

3287E0CD9AF948E...
Signature

Nathan R. Johnson

Printed / Typed Name

6. 47 U.S.C. § 214(e)(1)(B) requires every ETC to advertise its services (including Lifeline services) throughout the service area for which it has been designated “using media of general distribution.” **Please complete the following:**

| Name of Media | Type of Media | Geographic Areas Reached | Dates Published |
|------------------------------------------------------------|---------------|--------------------------|-----------------|
| www.truconnect.com | Internet | Throughout service area | Ongoing |
| | | | |
| | | | |
| | | | |
| | | | |
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| | | | |
| | | | |

(If necessary, please attach additional pages.)

**24-GIMT-612-GIT
Attachment 5**

7. A competitive ETC must certify that it offers a local usage plan comparable to that of the incumbent LEC. Please provide a description of the local usage plan(s) that is comparable to that of the incumbent LEC and complete the certification.

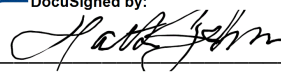
Similar to incumbent offerings, Sage offers a Lifeline discount off of its retail plan options and offers plans that allow for unlimited local usage. See attached Exhibit B for a summary of Sage’s Lifeline rate plants, which also exceed incumbent offerings in several respects. When you consider calling scope, usage that might otherwise be considered long distance, access to additional service features, and mobility, consumers may find that Sage’s wireless calling plans are comparable to the incumbent’s service offering.

**COMPARABLE LOCAL USAGE PLAN ANNUAL CERTIFICATION
KCC Docket Reference: 06-GIMT-446-GIT
(Please type or print legibly)**

1. My title is Co-CEO of the Sage Telecom Communications, LLC (Company/Cooperative). In this capacity, I am in a position of authority to certify whether the Company/Cooperative offers a local usage plan comparable to that of the incumbent. I am binding Sage Telecom Communications, LLC (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that Sage Telecom Communications, LLC (Company/Cooperative) offers a local usage plan comparable to that of the incumbent.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on 06/11/2024 (date).

DocuSigned by:

3287E0CD9AF948E...
Signature

Nathan R. Johnson
Printed/Typed Name

Exhibit B

Support for Attachment 5, Quality of Service Wireless Certification

Service Quality and Consumer Protection

The Company is committed to satisfying all applicable state and federal requirements related to consumer protection and service quality standards.

The Company complies with the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless Service.

1. Disclose Rates and Terms of Service – These are fully disclosed in advertising as well as on the Company's website.
2. Make Coverage Maps Available – Coverage maps are available on the Company's website.
3. Provide contract terms – The Company does not employ extended service contracts.
4. Allow a trial service – All wireless services, including Lifeline-supported services, are provided on a prepaid basis and therefore there is no extended commitment to the service on the part of the customer. If the service does not suit their needs, they can cancel service at any time without penalty.
5. Provide Specific Disclosure in advertising – All Company advertising, including its website, fully discloses charges and service parameters.
6. Separately Identify Carrier Charges from Tax on Billing Statements – The Company does not render billing statements to its prepaid customers, but for every transaction they make, service charges vs. taxes are fully described.
7. Provide Customers with the Right to Terminate Service Upon Changes to Their Contract – As mentioned, we don't employ contracts so this provision does not apply. Customers can, however, cancel service at any time without penalty.
8. Provide Ready Access to Customer Service – Customers can call customer service for free by dialing 611 or an 800 number, and/or using an Interactive voice response system. These numbers are disclosed on the Company's website and in advertising and customer welcome materials. Customers may also access Customer Service online through the Company's website.
9. Promptly Respond to Customer Inquiries and Complaints from Government Agencies – The Company promptly responds to all complaints. If a customer care representative cannot help a customer, there is an escalation process. The Company is committed to resolving customer questions, concerns and complaints in a swift and satisfactory manner.
10. Privacy Policy – The Company protects the privacy of customer information in accordance with applicable federal and state laws. Our privacy policy is available, via link, on every page of the Company's website.
11. Provide Consumers with Free Notifications for Voice, Data and Messaging Usage, and International Roaming – Due to the Company's service being provided on a prepaid basis, customers are not able to incur overage charges. However, the Company provides, at no charge, (a) a notification to consumers of domestic wireless plans that include limited data allowances when consumers approach their allowance for data usage; (b) a notification to consumers of domestic voice and messaging plans that include limited voice and messaging allowances when consumers approach their allowance for those services; and (c) a notification to consumers without an international roaming plan/package whose devices have registered abroad and who may incur charges for international usage. The Company

also clearly and conspicuously discloses tools or services that enable consumers to track, monitor and/or set limits on voice, messaging and data usage.

12. Abide by the following principles regarding the ability of customers, former customers, and individual owners of eligible devices to unlock phones and tablets, (“mobile wireless devices”) that are locked by or at the direction of the carrier –

- (1) Disclosure. The Company has posted on its website its clear, concise, and readily accessible policy on postpaid and/or prepaid mobile wireless device unlocking.
- (2) Postpaid Unlocking Policy. Not Applicable.
- (3) Prepaid Unlocking Policy. Upon request, the Company will unlock prepaid mobile wireless devices no later than one year after initial activation, consistent with reasonable time, payment or usage requirements.
- (4) Notice. The Company will clearly notify customers that their devices are eligible for unlocking at the time when their devices are eligible for unlocking or automatically unlock devices remotely when devices are eligible for unlocking, without additional fee. The Company reserves the right to charge non-customers/nonformer-customers with a reasonable fee for unlocking requests. Notice to prepaid customers may occur at point of sale, at the time of eligibility, or through a clear and concise statement of policy on the Company’s website.
- (5) Response Time. Within two business days after receiving a request, the Company will unlock eligible mobile wireless devices or initiate a request to the OEM to unlock the eligible device, or provide an explanation of why the device does not qualify for unlocking, or why the carrier reasonably needs additional time to process the request.
- (6) Deployed Personnel Unlocking Policy. The Company will unlock mobile wireless devices for deployed military personnel who are customers in good standing upon provision of deployment papers.

The Company reserves the right to decline an unlock request if it has a reasonable basis to believe the request is fraudulent or the device is stolen.

Exhibit C

Support for Attachment, 5 Emergency Functionality Certification

Functionality in Emergency Situations

As a reseller, the Company relies upon its underlying facilities-based carriers for functionality in emergency situations. The Company obtains from T-Mobile (and previously Sprint, before Sprint merged with T-Mobile) the network infrastructure and wireless transmission facilities to allow the Company to operate as a Mobile Virtual Network Operator (“MVNO”). Through these agreements, the Company provides to its customers the same ability to remain functional in emergency situations as currently provided by T-Mobile to their own customers. As a Tier I carrier, T-Mobile have redundancies, back-up generator power and an extensive disaster recovery program. The T-Mobile wireless network has reasonable amounts of back-up power and the ability to reroute traffic around damaged facilities and manage traffic spikes resulting from emergency situations. As a reseller of T-Mobile, these capabilities benefit the Company’s customers.