

UT-230144

Second Informal Information Request

ETC Designation Request

Received
Records Management
Jul 19, 2023

TO: DISH Wireless, LLC
Sola Lee, Senior Corporate Counsel

RE: **UT-230144**
Dish Wireless, LLC – Petition for Designation as an Eligible Telecommunications Carrier
Requests for Information – Responses due July 20, 2023, or sooner (an extension was granted from the original due date of June 30, 2023).

Gen Mobile’s Response to the Second Informal Information Request

Pursuant to Jonathon Church’s email dated May 26, 2023 regarding the Petition for Designation as an Eligible Telecommunications Carrier in the State of Washington for the Limited Purpose of Providing Lifeline Service to Qualifying Customers, DISH Wireless L.L.C. dba Gen Mobile (“DISH Wireless” or “Gen Mobile”) hereby submits this response to the Second Informal Information Request (“Info Request”) from the Washington Utilities and Transportation Commission (“Commission”). DISH Wireless’ response is in italics for easier viewing.

General Objections

DISH Wireless objects to the Info Request to the extent it seeks production of materials or information protected from disclosure by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege, doctrine, or protection from disclosure. DISH Wireless further objects to the Info Request to the extent it seeks production of materials or information that DISH Wireless is not lawfully permitted to disclose to any third parties, including, but not limited to, materials that may not be disclosed to any third parties pursuant to terms of a contract, a federal or state law, or a directive from a federal or state government agency. Any inadvertent production of any document shall not be deemed or construed to constitute a waiver of any privilege or right, and DISH Wireless reserves the right to demand that the Commission and/or the Commission Staff return any such document and all copies thereof.

Response

11. Re: Info Request 2 – Yes, please register the trade name “Gen Mobile” with the Washington State Department of Revenue. More information on how to register can be found here. [Register trade names | Washington Department of Revenue](#).
 - a. *DISH Wireless Response: As of the filing of this Response, DISH Wireless is expeditiously working with the current name holder of “Gen Mobile” so that the Company is able to register the trade name “Gen Mobile.” DISH Wireless will*

provide a conformed copy to the Commission as soon as DISH Wireless receives it.

12. Re: Info Request 4 – Please provide details of what is included when customers bundle their Lifeline and ACP through DISH Wireless.
 - a. Are there different types of plans that the bundle can be applied to? Or is it simply a direct discount applied to the customer for the same amount that they receive in subsidies? (Please refer to Condition 4 in the attached “recent conditions for LLO-ETC designation”).
 - i. *DISH Wireless Response: A qualified Lifeline and ACP customer may apply the total amount of their Lifeline and ACP subsidies or discounts toward any Gen Mobile-branded plan. A Lifeline and ACP customer who wants to receive broadband service for no cost must apply both programs’ subsidies and discounts toward, and select, the Unlimited Talk and Text and 16 GB of Data Plan while a Tribal Lifeline and ACP customer will receive the Unlimited Talk, Text, and Data (55 GB of high speed and hotspotting).*
13. Re: Info Request 5a – Please provide any additional approvals for ETC designation that DISH Wireless has received since the last response.
 - a. *DISH Wireless Response: Since the Response to the Initial Informal Information, DISH Wireless received its ETC designation in Tennessee, Docket No. 23-00010, June 1, 2023; Missouri, Docket No. RA-2023-0381, June 22, 2023; Rhode Island, Docket, No. 23-13-TL, June 22, 2023; and Vermont, Docket No. 23-0918-PET, June 27, 2023.*
14. Re: Info Request 7 – You provided a Profit and Loss statement ending December 31, 2022, and a Balance Sheet as of December 31, 2022, for your parent company, DISH NETWORK CORPORATION.
 - a. Do you have the same financial information for DISH Wireless, LLC? If yes, please provide staff with copies of this information.
 - i. *DISH Wireless Response: The Balance Sheet provided is from the 10-K of DISH Network Corporation, DISH Wireless’ parent holding company, and consolidates the financial information of DISH Network Corporation’s’ subsidiaries, including DISH Wireless. See attached hereto as Schedule 14.a. the 2020-2022 financial summary of DISH Wireless from the same 10-K that contributed to the Consolidated Balance Sheet.*
 - b. If no, can you provide a supplemental exhibit with a written and signed guarantee that DISH NETWORK CORPORATION will insure financial responsibility for all obligations incurred by DISH Wireless, LLC?
 - i. *N/A*
15. Re: Info Request 9 – In accordance with the Petition, Staff understands that the Lifeline Plans will be offered at no cost to qualifying customers.

- a. Will Lifeline Customers be able to choose from other service plans and still apply their Lifeline Subsidy to the price?
- i. *DISH Wireless Response: Yes.*
- b. If yes, please provide staff a list of other plans with details on the plan offering, price for the service, and the price Lifeline Customers would pay.
- i. *DISH Wireless Response: As of this Response, the amount a Lifeline Customer would pay for the listed plans are as follows:*

<i>Plan Cost (\$)</i>	<i>Plan Type</i>	<i>Remaining Amount Due after Lifeline Subsidy of \$9.25 (\$)</i>
<i>10</i>	<i>Unlimited Talk and Text and 1GB Data</i>	<i>0.75</i>
<i>20</i>	<i>Unlimited Talk and Text and 3GB Data</i>	<i>10.75</i>
<i>30</i>	<i>Unlimited Talk and Text and 7GB Data</i>	<i>20.75</i>
<i>40</i>	<i>Unlimited Talk and Text and 16GB Data</i>	<i>30.75</i>
<i>50</i>	<i>Unlimited Talk, Text, and Data (10GB mobile hotspot)</i>	<i>40.75</i>
<i>60</i>	<i>Unlimited Talk, Text, and Data (20GB mobile hotspot)</i>	<i>50.75</i>

16. Re: Info Request 10 – Please resubmit Exhibit 3 with a list of **only** ILEC “Exchange areas” in Washington that correspond to the company’s proposed service area. (Please refer to the list that we provided in the previous request).

- a. *DISH Wireless Response: See Schedule 16 attached hereto.*

Schedule 14.a.
The 10-K Financial Summary of DISH Wireless

DISH NETWORK CORPORATION
NOTES TO CONSOLIDATED FINANCIAL STATEMENTS - Continued

	<u>Pay-TV</u>	<u>Wireless</u>	<u>All Other & Eliminations</u>	<u>Consolidated Total</u>
	(In thousands)			
Year Ended December 31, 2022				
Total revenue	\$ 12,505,392	\$ 4,180,018	\$ (6,003)	\$ 16,679,407
Depreciation and amortization	428,472	288,601	—	717,073
Operating income (loss)	2,933,898	(888,232)	—	2,045,666
Interest income	1,872,645	5	(1,829,874)	42,776
Interest expense, net of amounts capitalized	(1,036,829)	(815,826)	1,829,874	(22,781)
Other, net	1,264	1,037,718	—	1,038,982
Income tax (provision) benefit, net	(911,955)	180,219	—	(731,736)
Net income (loss)	2,859,023	(486,116)	—	2,372,907
Year Ended December 31, 2021				
Total revenue	\$ 12,928,707	\$ 4,957,272	\$ (4,873)	\$ 17,881,106
Depreciation and amortization	538,836	186,016	—	724,852
Operating income (loss)	3,075,580	127,455	—	3,203,035
Interest income	1,346,502	6	(1,335,170)	11,338
Interest expense, net of amounts capitalized	(819,510)	(531,834)	1,335,170	(16,174)
Other, net	(2,917)	23,474	—	20,557
Income tax (provision) benefit, net	(853,362)	90,552	—	(762,810)
Net income (loss)	2,746,293	(290,347)	—	2,455,946
Year Ended December 31, 2020				
Total revenue	\$ 12,897,413	\$ 2,599,842	\$ (3,820)	\$ 15,493,435
Depreciation and amortization	613,926	100,626	—	714,552
Operating income (loss) (1)	2,903,183	(320,568)	—	2,582,615
Interest income	1,676,953	4	(1,654,223)	22,734
Interest expense, net of amounts capitalized	(922,876)	(744,321)	1,654,223	(12,974)
Other, net	2,020	(22,184)	—	(20,164)
Income tax (provision) benefit, net	(836,296)	138,021	—	(698,275)
Net income (loss)	2,822,984	(949,048)	—	1,873,936

(1) The year ended December 31, 2020 was negatively impacted by an “Impairment of long-lived assets” of \$356 million. See Note 2 for further information.

Schedule 16

A List of ILEC Exchange Areas in Washington of Company's Proposed Service Area

<u>Company Name</u>	<u>Exchange</u>
Asotin Telephone Company	Anatone
Asotin Telephone Company	Asotin
CenturyTel of Cowiche, Inc.	Cowiche
CenturyTel of Cowiche, Inc.	Rimrock
CenturyTel of Cowiche, Inc.	Tieton
CenturyTel of Inter Island, Inc.	San Juan
CenturyTel of Washington	Almira
CenturyTel of Washington	Ames Lake
CenturyTel of Washington	Ashford
CenturyTel of Washington	Basin City
CenturyTel of Washington	Carnation
CenturyTel of Washington	Cathlamet/Puget Island
CenturyTel of Washington	Cheney
CenturyTel of Washington	Chewelah
CenturyTel of Washington	Connell
CenturyTel of Washington	Coulee City
CenturyTel of Washington	Creston
CenturyTel of Washington	Curtis
CenturyTel of Washington	Davenport
CenturyTel of Washington	Edwall-Tyler
CenturyTel of Washington	Elma
CenturyTel of Washington	Eltopia
CenturyTel of Washington	Eureka
CenturyTel of Washington	Fall City
CenturyTel of Washington	Forks
CenturyTel of Washington	Fox Island
CenturyTel of Washington	Gig Harbor
CenturyTel of Washington	Harrington
CenturyTel of Washington	Hunters
CenturyTel of Washington	Kettle Falls
CenturyTel of Washington	Kingston
CenturyTel of Washington	Lake Quinault
CenturyTel of Washington	Lind
CenturyTel of Washington	Long Beach
CenturyTel of Washington	Mathews Corner
CenturyTel of Washington	Medical Lake
CenturyTel of Washington	Mesa
CenturyTel of Washington	Montesano

<u>Company Name</u>	<u>Exchange</u>
CenturyTel of Washington	Morton
CenturyTel of Washington	Nespelem
CenturyTel of Washington	North Bend
CenturyTel of Washington	Ocosta
CenturyTel of Washington	Odessa
CenturyTel of Washington	Orting
CenturyTel of Washington	Othello
CenturyTel of Washington	Reardan
CenturyTel of Washington	Ritzville
CenturyTel of Washington	South Bend
CenturyTel of Washington	Spangle
CenturyTel of Washington	Sprague
CenturyTel of Washington	Twisp
CenturyTel of Washington	Vader
CenturyTel of Washington	Vashon
CenturyTel of Washington	Washtucna
CenturyTel of Washington	Wilbur
CenturyTel of Washington	Wilson Creek
CenturyTel of Washington	Winthrop
CenturyTel of Washington	Yacolt
DISH Wireless L.L.C.	Aberdeen
DISH Wireless L.L.C.	Auburn
DISH Wireless L.L.C.	Bellevue
DISH Wireless L.L.C.	Bothell
DISH Wireless L.L.C.	Bremerton
DISH Wireless L.L.C.	Chewelah
DISH Wireless L.L.C.	Clarkston
DISH Wireless L.L.C.	Eatonville
DISH Wireless L.L.C.	Elma
DISH Wireless L.L.C.	Enumclaw
DISH Wireless L.L.C.	Everett
DISH Wireless L.L.C.	Kennewick
DISH Wireless L.L.C.	Longview
DISH Wireless L.L.C.	Maple Valley
DISH Wireless L.L.C.	Marysville
DISH Wireless L.L.C.	Mt Vernon
DISH Wireless L.L.C.	Newport
DISH Wireless L.L.C.	Oak Harbor
DISH Wireless L.L.C.	Olympia
DISH Wireless L.L.C.	Poulsbo
DISH Wireless L.L.C.	Seattle

<u>Company Name</u>	<u>Exchange</u>
DISH Wireless L.L.C.	Snohomish
DISH Wireless L.L.C.	South Whidbey
DISH Wireless L.L.C.	Spokane
DISH Wireless L.L.C.	Tacoma
DISH Wireless L.L.C.	Walla Walla
DISH Wireless L.L.C.	Wenatchee
DISH Wireless L.L.C.	Whatcom County
DISH Wireless L.L.C.	Yakima
Consolidated Communications of WA Co., LLC	Ellensburg
Consolidated Communications of WA Co., LLC	Selah
Consolidated Communications of WA Co., LLC	Thorp
Frontier Communications Northwest, Inc.	Bellevue
Frontier Communications Northwest, Inc.	Benton City
Frontier Communications Northwest, Inc.	Bothell
Frontier Communications Northwest, Inc.	Brewster
Frontier Communications Northwest, Inc.	Bridgeport
Frontier Communications Northwest, Inc.	Camas
Frontier Communications Northwest, Inc.	Curlew
Frontier Communications Northwest, Inc.	Douglas County
Frontier Communications Northwest, Inc.	Everett
Frontier Communications Northwest, Inc.	Farmington
Frontier Communications Northwest, Inc.	Garfield
Frontier Communications Northwest, Inc.	George
Frontier Communications Northwest, Inc.	Gray Harbor County
Frontier Communications Northwest, Inc.	Halls Lake
Frontier Communications Northwest, Inc.	Kennewick
Frontier Communications Northwest, Inc.	Kirkland
Frontier Communications Northwest, Inc.	Loomis
Frontier Communications Northwest, Inc.	Marysville
Frontier Communications Northwest, Inc.	Molson
Frontier Communications Northwest, Inc.	Mt Vernon
Frontier Communications Northwest, Inc.	Naches
Frontier Communications Northwest, Inc.	Newport
Frontier Communications Northwest, Inc.	Nile
Frontier Communications Northwest, Inc.	Oak Harbor
Frontier Communications Northwest, Inc.	Oakesdale
Frontier Communications Northwest, Inc.	Palouse
Frontier Communications Northwest, Inc.	Pullman
Frontier Communications Northwest, Inc.	Quincy
Frontier Communications Northwest, Inc.	Republic
Frontier Communications Northwest, Inc.	Richland

<u>Company Name</u>	<u>Exchange</u>
Frontier Communications Northwest, Inc.	Richmndbch
Frontier Communications Northwest, Inc.	Rockford
Frontier Communications Northwest, Inc.	Rosalia
Frontier Communications Northwest, Inc.	Seattle
Frontier Communications Northwest, Inc.	Silverlake
Frontier Communications Northwest, Inc.	Snohomish
Frontier Communications Northwest, Inc.	Soap Lake
Frontier Communications Northwest, Inc.	Stevens Pass
Frontier Communications Northwest, Inc.	Tekoa
Frontier Communications Northwest, Inc.	Tonasket
Frontier Communications Northwest, Inc.	Wenatchee
Frontier Communications Northwest, Inc.	Whatcom County
Frontier Communications Northwest, Inc.	Woodland
Hat Island Telephone Company	Hat Island
Hood Canal Telephone Co., Inc.	Union
Inland Telephone Company	Cle Elum
Inland Telephone Company	Dewatto
Inland Telephone Company	Prescott
Inland Telephone Company	Uniontown
Kalama Telephone Company	Kalama
Lewis River Telephone Company, Inc.	Amboy
Lewis River Telephone Company, Inc.	Cougar
Lewis River Telephone Company, Inc.	La Center
Lewis River Telephone Company, Inc.	Yale
Mashell Telecom Inc.	Eatonville
McDaniel Telephone Company	Mossyrock
McDaniel Telephone Company	Salkum
Pend Oreille Telephone Company	Cusick
Pend Oreille Telephone Company	Ione
Pend Oreille Telephone Company	Metaline Falls
Pioneer Telephone Company	Endicott
Pioneer Telephone Company	La Crosse
Qwest Corporation	Aberdeen-Hoquiam
Qwest Corporation	Auburn
Qwest Corporation	Bainbridge Island
Qwest Corporation	Battleground
Qwest Corporation	Belfair
Qwest Corporation	Bellevue
Qwest Corporation	Black Diamond
Qwest Corporation	Bremerton
Qwest Corporation	Buckley

<u>Company Name</u>	<u>Exchange</u>
Qwest Corporation	Castle Rock
Qwest Corporation	Centralia
Qwest Corporation	Chehalis
Qwest Corporation	Clarkston
Qwest Corporation	Cle Elum
Qwest Corporation	Colfax
Qwest Corporation	Colville/Orient Laurier
Qwest Corporation	Copalis
Qwest Corporation	Coulee Dam
Qwest Corporation	Crystal Mountain
Qwest Corporation	Dayton
Qwest Corporation	Deer Park
Qwest Corporation	Des Moines
Qwest Corporation	Elk
Qwest Corporation	Enumclaw
Qwest Corporation	Ephrata
Qwest Corporation	Graham
Qwest Corporation	Hoodspport
Qwest Corporation	Issaquah
Qwest Corporation	Kent
Qwest Corporation	Liberty Lake
Qwest Corporation	Longview Kelso
Qwest Corporation	Loon Lake
Qwest Corporation	Maple Valley
Qwest Corporation	Moses Lake
Qwest Corporation	Newman Lake
Qwest Corporation	Northport
Qwest Corporation	Olympia
Qwest Corporation	Omak
Qwest Corporation	Oroville
Qwest Corporation	Othello
Qwest Corporation	Pasco
Qwest Corporation	Pateros
Qwest Corporation	Pomeroy
Qwest Corporation	Port Orchard
Qwest Corporation	Port Ludlow
Qwest Corporation	Port Angeles
Qwest Corporation	Port Townsend
Qwest Corporation	Puyallup
Qwest Corporation	Renton
Qwest Corporation	Ridgefield

<u>Company Name</u>	<u>Exchange</u>
Qwest Corporation	Rochester
Qwest Corporation	Roy
Qwest Corporation	Seattle
Qwest Corporation	Shelton
Qwest Corporation	Silverdale
Qwest Corporation	Spokane
Qwest Corporation	Springdale
Qwest Corporation	Sumner
Qwest Corporation	Tacoma
Qwest Corporation	Tacoma
Qwest Corporation	Touchet
Qwest Corporation	Vancouver
Qwest Corporation	Waitsburg
Qwest Corporation	Walla Walla
Qwest Corporation	Warden
Qwest Corporation	Whatcom County
Qwest Corporation	Winlock
Qwest Corporation	Yakima
Skyline Telecom, Inc.	Mt Hull
Skyline Telecom, Inc.	Snohomish
St John Co-Op Telephone & Telegraph Company	St John
Tenino Telephone Company	Tenino
The Toledo Telephone Company	Toledo
United Telephone Company of The Northwest	Chimacum
United Telephone Company of The Northwest	Columbia
United Telephone Company of The Northwest	Glenwood
United Telephone Company of The Northwest	Goldendale
United Telephone Company of The Northwest	Grandview
United Telephone Company of The Northwest	Granger
United Telephone Company of The Northwest	Harrah
United Telephone Company of The Northwest	Hood Canal
United Telephone Company of The Northwest	Klickitat
United Telephone Company of The Northwest	Lyle
United Telephone Company of The Northwest	Mabton
United Telephone Company of The Northwest	Mattawa
United Telephone Company of The Northwest	Poulsbo
United Telephone Company of The Northwest	Prosser
United Telephone Company of The Northwest	Port Angeles
United Telephone Company of The Northwest	Roosevelt
United Telephone Company of The Northwest	Stevenson
United Telephone Company of The Northwest	Sunnyside

<u>Company Name</u>	<u>Exchange</u>
United Telephone Company of The Northwest	Toppenish
United Telephone Company of The Northwest	Trout Lake
United Telephone Company of The Northwest	Wapato
United Telephone Company of The Northwest	White Salmon
United Telephone Company of The Northwest	White Swan
United Telephone Company of The Northwest	Whitstran
United Telephone Company of The Northwest	Willard
Western Wahkiakum County Telephone Company	Grays River
Western Wahkiakum County Telephone Company	Naselle
Westgate Communications LLC	Wenatchee
Whidbey Telephone Company	Point Roberts
Whidbey Telephone Company	South Whidbey
YCOM Networks, Inc.	Rainier
YCOM Networks, Inc.	Yelm