



UT-230144

March 1, 2024

Via E-Filing

Kathy Hunter
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

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**RE: DISH Wireless L.L.C. dba Gen Mobile – First Amended to
Petition for Designation as an Eligible Telecommunications
Carrier in the State of Washington; Docket No. 230144**

Dear Ms. Hunter:

Please find for filing DISH Wireless dba Gen Mobile's First Amended Petition for Designation as an Eligible Telecommunications Carrier in the State of Washington.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

Respectfully submitted,

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**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

DISH Wireless L.L.C.)
Petition for Designation as an Eligible)
Telecommunications Carrier in the State of)
Washington for the Limited Purpose of) **Docket No. UT-230144**
Providing Lifeline Service to Qualifying)
Customers)
)

**FIRST AMENDED PETITION OF DISH WIRELESS L.L.C. FOR
DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER IN
THE STATE OF WASHINGTON FOR THE LIMITED PURPOSE OF
OFFERING LIFELINE SERVICE TO QUALIFIED HOUSEHOLDS**

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I. INTRODUCTION

DISH Wireless L.L.C. dba Gen Mobile (“DISH Wireless” 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 and Sections 54.101 through 54.207² of the Rules of the Federal Communications Commission (“FCC”),³ and the rules and regulations of the Washington Utilities and Transportation Commission (the “Commission”), including Section 480-123-030 of the Washington Administrative Code (“WAC”), hereby submits this First Amended Petition (the “Petition”) for Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of Washington. This Petition replaces in its entirety the original petition filed on March 30, 2023. The Company seeks ETC designation for the limited purpose of providing Lifeline service under the brand name “Gen Mobile” to qualifying Washington consumers, including those on federally recognized Tribal lands.

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R. §§ 54.101-54.207.

³ DISH Wireless files this Petition in accordance with the rules adopted by the FCC in the *2012 Lifeline Reform Order*. 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*”).

As demonstrated herein, and as certified in Exhibit 1 to this Petition, the Company meets all the federal and state statutory and regulatory requirements for designation as an ETC in Washington. Grant of this Petition, moreover, would advance the public interest because it would enable the Company to commence much needed Lifeline services to low-income Washington residents, including those on Tribal lands, as soon as possible. Accordingly, the Company respectfully requests that the Commission expeditiously approve this Petition.

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

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II. COMPANY OVERVIEW

DISH Wireless L.L.C. is a Colorado limited liability company with a principal address at 9601 S. Meridian Blvd, Englewood, CO 80112. DISH Wireless provides, among other things, resold wireless telecommunications services operating in Washington and other states, using the Gen Mobile brand name and other brand names.

DISH Network Corporation (“DISH Network”), which indirectly owns 100% of DISH Wireless and recently combined with EchoStar Corporation (“EchoStar”) in a *pro forma* transaction,⁴ is a connectivity company headquartered in Colorado that has served as a disruptive force in the pay-TV market since 1980. In 2020, DISH Wireless entered the retail wireless

⁴ The merger with EchoStar was a *pro forma* transaction approved by the Federal Communications Commission; ultimate control of both companies remains the same. See FCC Public Notice, APPLICATIONS GRANTED FOR THE TRANSFER OF CONTROL OF DISH NETWORK CORP. AND ITS SUBSIDIARIES TO ECHOSTAR CORP., DA 23-1137, Dec. 6, 2023, available at <https://docs.fcc.gov/public/attachments/DA-23-1137A1.pdf>.

business by acquiring the Boost Mobile brand and in 2021, acquiring the Gen Mobile brand as well as other brands and customer assets. Now, using its own licensed wireless spectrum assets, DISH Wireless is building the nation's first virtualized, cloud-native, Open RAN-based 5G broadband network. To facilitate the buildout, DISH Wireless has entered into multi-year agreements with over 30 partners, including Mavenir, Amazon, Dell, CISCO, VM Ware, IBM, Oracle, Nokia, Fujitsu, MTI, Intel, Altiostar, Samsung, and Qualcomm. Because DISH Wireless is actively constructing wireless facilities around the country, it is well positioned to identify opportunities to target buildouts in underserved and unserved areas.

Even as the 5G network is under construction, DISH Wireless has already been competing in the retail wireless space and is an approved provider in the Federal Communications Commission's Affordable Connectivity Program ("ACP"). Under the Gen Mobile and other brand names, DISH Wireless currently uses its own network and partner carriers' wireless facilities to provide discounted mobile broadband service in all 50 states and the territories of Washington D.C. and Puerto Rico, including plans bundling voice, text messaging, and broadband services.⁵ Available Gen Mobile branded plans include talk, text, and data at various data speeds under the ACP's monthly \$30 subsidy for eligible consumers. DISH Wireless has an application for ETC designation pending with the FCC (for the states of Alabama, Connecticut, Delaware, Florida, Maine, New Hampshire, North Carolina, and the District of Columbia, the "Non-Jurisdictional States"). DISH Wireless is currently designated as a wireless ETC in Colorado, Hawaii, Idaho, Indiana, Iowa, Kentucky, Louisiana, Maryland, Michigan, Minnesota, Mississippi, Missouri, Nebraska, New York, Ohio, Oklahoma, Rhode

⁵ See 47 C.F.R. § 54.1802(b) ("a bundle of broadband internet access service along with fixed or mobile voice telephony service, text messaging service, or both" is an ACP-eligible plan).

Island, South Carolina, Tennessee, Texas, Utah, Vermont, Virginia, West Virginia, Wisconsin, and Wyoming and authorized by the California Public Utilities Commission to provide California LifeLine service and plans to file for ETC status in other states over time.

DISH Wireless now seeks an ETC designation in Washington so that it can (i) serve low-income Washington customers, (ii) supplement the amount of support available to its current ACP customers, and (iii) invite new, underserved customers to benefit from Lifeline and other federal support programs. DISH Wireless' Lifeline-supported plans will be offered to prepaid customers under the Gen Mobile brand, a recognized and trusted provider in this market segment. Gen Mobile prepaid wireless plans are affordable, easy to use, and attractive to low-income consumers, providing them with connectivity that has become indispensable to participating in 21st century society and opportunities. Gen Mobile customers can choose from several affordable prepaid calling plans and handsets and have access to high-quality, responsive customer service. Gen Mobile prepaid plans start as low as \$10 per month and can be refilled at an estimated 10,000 retail locations nationwide.

III. THE COMMISSION HAS JURISDICTION OVER DESIGNATION OF WIRELESS ETCS

Section 214(e)(2) of the Act provides state public utility commissions with the primary responsibility for the designation of ETCS.⁶ Under the Act, a state public utility commission, like the Commission, with jurisdictional authority over ETC designations must designate a common carrier as an ETC if the carrier satisfies the requirements of Section 214(e)(1). Therefore, the Commission has the authority to designate DISH Wireless as an ETC. As

⁶ 47 U.S.C. § 214(e)(2).

demonstrated below, DISH Wireless fulfills the requirements to be designated as an ETC in Washington.

IV. THE COMPANY MEETS THE REQUIREMENTS FOR ETC DESIGNATION

A petition for ETC designation in Washington must meet specific federal statutory and regulatory requirements. As demonstrated below, DISH Wireless meets the requirements for ETC designation by the FCC pursuant to Section 214(e)(2) of the Communications Act. These include: (1) a certification that the petitioner offers or intends to offer all services designated for support by the FCC pursuant to section 254(c) of the Communications Act; (2) a certification that the petitioner offers or intends to offer the supported services on a common carrier basis either using its own facilities or a combination of its own facilities and/or resale of another carrier's services; (3) a description of how the petitioner advertises the availability of the supported services and the charges therefor using media of general distribution; (4) a detailed description of the geographic service area for which the petitioner requests to be designated as an ETC; and (5) a certification that neither the petitioner, nor any party to the application, is subject to a denial of federal benefits pursuant to the Anti-Drug Abuse Act of 1988.⁷

In addition, a petitioner seeking designation as an ETC solely for the purpose of offering Lifeline service must: (1) certify that it will comply with the service requirements applicable to the support that it receives; (2) demonstrate its ability to remain functional in emergency situations; (3) demonstrate its ability to satisfy applicable consumer protection and service quality standards; and (4) demonstrate that it is financially and technically capable of providing Lifeline service.⁸

⁷ 47 U.S.C. § 214(e)(1) and (5); 47 C.F.R § 54.201(d)(1) and (2); 47 C.F.R § 54.207(a).

⁸ 47 CFR § 54.202(a). Section 54.202(a)(ii) requires carriers seeking ETC designation that is not limited to Lifeline service to submit a five-year plan that describes proposed improvements to the carrier's network throughout the

Finally, prior to designating a carrier as an ETC, the Commission must determine whether such designation is in the public interest.⁹ When making a public interest determination, the Commission considers the benefits of increased consumer choice and the unique advantages and disadvantages of the petitioner's service offerings.¹⁰

A. DISH Wireless Is a Common Carrier

DISH Wireless provides, among other things, commercial mobile radio services (CMRS) that are regulated pursuant to the common carrier requirements of the Communications Act.¹¹ Accordingly, the Company meets the common carrier requirement for ETC designation pursuant to Section 214(e)(1) of the Act and Section 54.201(d) of the FCC's rules.

B. DISH Wireless Will Offer the Services Supported by Federal Universal Service

Pursuant to Section 54.101(a) of the FCC's rules, DISH Wireless' voice service provides the following: (1) voice grade access to the public switched network or its functional equivalent; (2) minutes of use for local service at no additional charge to end users; (3) access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and (4) toll limitation services to qualifying low-

proposed service area. Although DISH Wireless is not seeking high cost support in this Petition, it is building out its 5G network in accordance with certain FCC-approved construction deadlines as described below.

⁹ 47 U.S.C. §214(e)(6); 47 C.F.R. § 54.202(b).

¹⁰ See, e.g., *Virgin Mobile ETC Designation Order in the States of Alabama, Connecticut, Delaware, New Hampshire and the District of Columbia*, WC Docket 09-197, Order, 25 FCC Rcd 17797, 17799, ¶ 6 (WCB 2010).

¹¹ See 47 U.S.C. § 153(11) (defining a common carrier as "any person engaged as a common carrier for hire, in interstate or foreign communications by wire or radio"); 47 U.S.C. §332 (c)(1)(A) (treating commercial mobile service providers as common carriers).

income consumers.¹² As defined in Section 8.1(b) of the FCC’s rules, DISH Wireless also provides broadband internet access service to consumers.¹³

C. DISH Wireless Will Offer the Services Designated for Support Using a Combination of Its Own Facilities and Resale

DISH Wireless, through the Gen Mobile brand, offers the supported services – voice telephony service and broadband Internet access service – meeting the standards set in the FCC’s rules.¹⁴ DISH Wireless is currently providing and will provide mobile voice, text messaging, and broadband services to low-income consumers. The various Lifeline service plans and features that will be available to qualifying low-income Washington residents, including those on Tribal lands, are described in Exhibit 2.

In general, Section 214 requires ETCs to provide services using their facilities, at least in part. DISH Wireless is in a unique position to increase wireless competition and serve low-income consumers. Gen Mobile service plans are currently supported by underlying carriers’ networks. This will allow DISH Wireless to immediately introduce new Lifeline options for Washington consumers as soon as the Commission approves this Petition. At the same time, DISH Wireless is building out an advanced nationwide 5G network of its own. The Company recently launched in over 130 cities (including in Washington) and currently offers 5G broadband service to more than 70 percent of the U.S. population.¹⁵ In areas of Washington where service on DISH Wireless’ own network is not yet available or where the Company does

¹² 47 C.F.R. § 54.101(a); *see also* 47 U.S.C. § 214(e)(1)(A).

¹³ *See* 47 C.F.R. § 8.1(b).

¹⁴ *See* 47 C.F.R. § 54.101(a); WAC 480-123-030(1)(b).

¹⁵ *See* DISH Press Release, The DISH 5G Network is Now Available to Over 70 Percent of the U.S. Population, June 15, 2023. *See also* Applications of American H Block Wireless L.L.C., DBSD Corporation, Gamma Acquisition L.L.C., and Manifest Wireless L.L.C. for Extension of Time, *Order of Modification and Extension of Time to Construct*, DA 20-1072 WT Docket 18-197 (rel. Sept. 11, 2020).

not yet offer Lifeline products on its own network, DISH Wireless will provide service on a resale basis on partner networks. Accordingly, pursuant to 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.101(b), DISH Wireless will offer Gen Mobile-branded services that are designated for federal universal support using a combination of its own facilities and/or resale of another carrier's services. A complete description of the Gen Mobile terms, conditions and rates applicable for supported services can be found at <https://www.genmobile.com>. Because DISH Wireless is deploying facilities-based wireless voice and broadband services in Washington and other states, there is no need for DISH Wireless to obtain an approved FCC Compliance Plan in accordance with the *2012 Lifeline Reform Order*.¹⁶

D. DISH Wireless Will Provide Gen Mobile-Branded Service Throughout Its Designated Service Area

Pursuant to 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d), as an ETC, DISH Wireless will provide service in the same 50-state footprint where it currently offers ACP service -- this includes the entire geographic boundary of the State of Washington subject to coverage limits of underlying carriers and DISH Wireless' own network. Further, pursuant to 47 C.F.R. § 54.202(a)(1)(i), the Company commits to provide service throughout its proposed service area on a timely basis to all customers making a reasonable request for service where facilities are available. DISH requests ETC designation that is statewide in scope to allow the Company to provide Lifeline service wherever its underlying, facilities-based providers have wireless coverage. The current Washington service area by current and proposed zip code and incumbent local exchange carrier (ILEC) exchanges is attached hereto as Exhibit 3.¹⁷

¹⁶ See *2012 Lifeline Reform Order*, ¶ 368.

¹⁷ See WAC 480-123-030(1)(a).

E. The Company Will Advertise the Availability of Gen Mobile Services and Charges Using Media of General Distribution

Pursuant to 47 U.S.C. § 214(e)(1)(B) and 47 C.F.R. § 54.201(d)(2), the Company will advertise the availability of Gen Mobile-branded voice, text messaging, and broadband services through various marketing channels that may include direct mail, email, local and community outreach events, and targeted online electronic advertising.¹⁸ In addition, the availability of Gen Mobile Lifeline service will be publicized in ways that are reasonably designed to reach those who will likely qualify for the service, including those residing on Tribal lands. The Company's marketing efforts will be consistent with and in compliance with the Commission's rules. Samples of the Company's Lifeline advertising are attached hereto as Exhibit 4.

F. DISH Wireless Will Comply with Service Requirements Applicable to the Support It Receives

Pursuant to 47 C.F.R. § 54.202(a)(1)(i), DISH Wireless will comply with the service requirements applicable to the supported services it will be offering in the identified service areas. Gen Mobile plans will be offered in Washington initially by reselling partner network services, and in the future will also be supported by DISH's own 5G network facilities when feasible. DISH Wireless' network partners are operational and largely built out. Thus, the Company will be able to commence offering its Lifeline service to all locations served by its underlying carriers very soon after receiving approval from the Commission.

G. DISH Wireless Will Comply with Any Applicable Two-Year and Five-Year Plan Requirements

Pursuant to 47 C.F.R. § 54.202(a)(1)(ii), a common carrier seeking designation as a Lifeline-only ETC is not required to submit a five-year network improvement plan as part of its Petition for designation as an ETC. DISH Wireless is in a unique position, however, because it

¹⁸ See WAC 480-123-030(1)(e).

is constructing its own facilities-based 5G wireless network subject to FCC-approved buildout milestones, including having already deployed its 5G broadband service to 70% of the U.S. population by June 14, 2023 and (using certain low-band spectrum) scheduled to deploy in 75% of the population of each Partial Economic Area by June 14, 2025. DISH Wireless commits to providing service consistent with the requirements of any other support mechanism pursuant to which it is authorized to receive support in the future.

H. Consumer Protection and Service Quality Standards

The Company commits to comply with all applicable consumer protection and service quality standards for universal service programs. As stated in 47 C.F.R. § 54.202(a)(3), a wireless petitioner's commitment to comply with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service ("CTIA Consumer Code") will satisfy this consumer protection and service quality requirement. DISH Wireless commits to fully complying with the CTIA Consumer Code.¹⁹

I. Ability to Remain Functional During Emergencies

The Company's services are able to remain functional in emergency situations as required by 47 C.F.R. Section 54.202(a)(2). DISH Wireless' greenfield 5G network operates in a cloud-native environment that is not encumbered by traditional technology and will be more flexible and resilient in the event of service outages. In addition, DISH Wireless relies on mobile virtual network operator (MVNO) partner networks that are designed to remain functional even without external power sources, are able to re-route traffic around damaged facilities, and can manage traffic spikes that may occur in emergency situations.

¹⁹ See WAC 480-123-030(1)(h).

J. DISH Wireless Is Financially and Technically Capable

As part of the *2012 Lifeline Reform Order*, the FCC amended its rules to require a carrier seeking designation as a Lifeline-only ETC to demonstrate that it is financially and technically capable of providing the supported Lifeline service in compliance with all of the low-income program rules.²⁰ DISH Wireless satisfies these criteria.

DISH Wireless is financially stable and capable of honoring its service obligations to customers as demonstrated by the Form 10-K (see Exhibit 5) of DISH Network Corporation.²¹ The Company will not rely exclusively on revenues from the provision of Lifeline services for its operating revenues. The Company also has access to additional capital resources from its parent and affiliate companies. The Company's financial resources position the Company to expand its operations to serve currently unserved/underserved eligible low-income Washington consumers, including those on Tribal lands, and increase competition.

In addition, the proposed Lifeline offerings will be overseen by a team of personnel with substantial industry experience with the requirements of the federal Lifeline program and marketing to the low-income consumer sector. Attached as Exhibit 6 is a current list of the Company's key personnel responsible for Gen Mobile-branded Lifeline offerings, with biographical information for each, showing that the Company has the expertise necessary to provide the services detailed herein.

K. Terms and Conditions of Proposed Lifeline Offering

The Company has the ability to provide all services supported by the universal service program, as detailed in 47 C.F.R. § 54.101(a), throughout Washington, including Tribal lands.

²⁰ See *2012 Lifeline Reform Order*, ¶ 387; see also 47 C.F.R. § 54.202(a)(4).

²¹ See also Financial Capability Letter by DISH Network.

The Company further affirms that its Lifeline-supported voice services will meet or exceed the minimum service standards set forth in 47 C.F.R. § 54.408, including as such standards are updated going forward. Gen Mobile-branded Lifeline-supported broadband services will also meet the minimum service standards set forth in 47 C.F.R. § 54.408 for mobile broadband internet access services, including for service speed and data usage allowance, as such standards are updated going forward. To the extent DISH Wireless provides devices for use with Lifeline-supported broadband service, such devices will meet the equipment requirements set forth in 47 C.F.R. § 54.408(f), and DISH Wireless will not impose an additional or separate tethering charge for mobile data usage below the minimum standard.²²

Attached hereto as Exhibit 2 is a summary table of the Company's proposed Lifeline service offerings, showing that Lifeline customers can receive 1,000 voice minutes, 1,000 text messages, and 4.5 gigabytes (GB) of data per month at a net cost of \$0.00 after application of Lifeline support or unlimited voice minutes and text messages and 11 GB of data per month at a net cost of \$0.00 after application of Lifeline Tribal support. Customers will also be able to purchase additional minutes or data as needed. In addition to wholly-supported or discounted wireless services, prepaid Lifeline customers will be able to receive an upgraded handset at an additional charge or SIM card offer, as well as access to voice mail, caller I.D., call forwarding, 3-way calling, and call waiting features at no additional charge. Customers may use their minutes to place domestic long-distance calls at no additional charge, and calls to the Company's customer service are free with no deduction of available minutes. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes.

²² See WAC 480-123-030(1)(c).

L. Gen Mobile’s Offerings Will Comply with Lifeline Certification and Annual Re-certification Requirements

Customers interested in obtaining information on the Lifeline program will be directed to a toll-free telephone number and to the Company’s website, which will contain information regarding the Company’s Lifeline service plans, including a description of the Lifeline program and eligibility criteria. DISH Wireless will use multiple outreach methods including but not limited to nonprofit partnerships, phone, online, and in person enrollments through Lifeline events. Section 54.410 of the FCC’s rules requires ETCs to certify and verify a Lifeline customer’s initial and continued eligibility. DISH Wireless will rely on the National Verifier and the National Lifeline Accountability Database (“NLAD”), both administered by the Universal Service Administrative Company (“USAC”), to determine an applicant’s eligibility for Lifeline service. DISH Wireless will require all Gen Mobile’s Lifeline applicants to complete the standard Lifeline application forms in the National Verifier environment. The standard Lifeline application complies with the disclosure, certification, and information collection requirements in 47 C.F.R. § 54.410(d).²³

For applicants verified as being eligible by USAC’s National Verifier and NLAD, DISH Wireless will complete enrollment by transmitting the required information into NLAD as required by Section 54.404(b)(6) of the FCC’s rules. In addition, at the time of enrollment, the Company will notify the applicant that the prepaid service must be personally activated by the subscriber and the subscriber must use their service every thirty (30) days in order to maintain their Lifeline benefit.

²³ *FCC Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline Program*, WC Docket No. 11-42, Public Notice, “Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline Program,” DA 18-161 (rel. Feb. 20, 2018). The standard application/certification forms are available on USAC’s website (*see* USAC, Lifeline Forms, <http://www.usac.org/li/tools/forms/default.aspx>).

DISH Wireless will also comply with Sections 54.410(f) of the FCC’s rules governing annual subscriber re-certification of eligibility and will coordinate with USAC’s National Verifier and NLAD systems to manage additional de-enrollments related to USAC-administered benefit transfers and failure to re-certify.²⁴

M. DISH Wireless Will Comply With All Regulations and Other Requirements Imposed by the Commission

By way of this Petition, DISH Wireless hereby declares its ability and goal to comply with all the rules, regulations, and requirements, including those outlined in Exhibit 7,²⁵ that the Commission may lawfully impose upon the Company’s provision of service contemplated by this Petition, including any reporting requirements set by the Commission. DISH Wireless will answer any questions or present additional testimony and other evidence about its services within the state upon the Commission’s request. In addition, DISH Wireless promises to pass on all support received from the federal Universal Service Fund (“USF”) to its qualified Lifeline customers.

N. Prevention of Waste, Fraud and Abuse

The Company recognizes the importance of safeguarding the USF, and has implemented measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. Gen Mobile Lifeline offerings will comply with the requirements of the NLAD and section 54.404 of the FCC’s rules. As part of the application process, the National Verifier queries the NLAD for every enrollment to determine whether a prospective subscriber is currently receiving a Lifeline service from DISH Wireless or any other ETC, and whether

²⁴ 47 C.F.R. §§ 54.405(e), 54.410(f).

²⁵ Exhibit 7 includes the publicly filed Buildout Status Report filed by DISH on July 14, 2023 and the publicly available coverage map of DISH’s 5G network in the State of Washington.

anyone else living at the prospective subscriber's residential address is currently receiving Lifeline service.

Consistent with federal regulations, the Company will not seek USF reimbursement for new subscribers until they have activated the service, either by initiation and/or actual use of the service, and will de-enroll any subscriber that has not used the Company's Lifeline service as set forth in 47 C.F.R. § 54.407(c)(2). An account will be considered active if the authorized subscriber establishes usage, as "usage" is defined by 47 C.F.R. § 54.407(c)(2), during the specified timeframe, currently a period of thirty (30) days, or during the notice period set forth in 47 C.F.R. § 54.405(e)(3), currently a period of fifteen (15) days. In accordance with 47 C.F.R. § 54.405(e)(3), DISH Wireless will provide the subscriber advance notice when a subscriber's failure to use the Lifeline service within the notice period will result in service termination for non-usage. Customers that have been deactivated may participate in the Company's Lifeline service in the future by reapplying and re-establishing eligibility.

To further protect the integrity of the USF, DISH Wireless contracts with third party vendors to backstop USAC's own processes and procedures. First, the Company will use Emerios Enterprise Services Inc. ("Emerios") software to process Lifeline applications. Among other things, Emerios uses third-party verification sources (including the Lexis Nexis LEXID service) to validate a prospective customer's identity. Emerios also validates the Company's subsidy data to prevent duplicate subsidies. In addition, the Company has established a back-office real time review ("RTR") process to be completed before a Lifeline application is passed to the National Verifier to qualify a customer. This process involves specially trained operations analysts (who have no financial stake in whether an application is successful) individually confirming the information entered into the application and supporting documentation to, among

other things, confirm the identities of the sales agent and the customer by reviewing pictures of them in real time during the application process and review the customer's identification and address for anomalies. DISH Wireless has hired experienced staff and a third party company to provide RTR for the Company's Lifeline enrollments. This third party company has substantial experience running RTR for other Lifeline providers.

O. Request for Exemption from Certain Lifeline Requirements of WAC 480-123-030

DISH Wireless requests that the Commission exempt it from the requirements set forth in WAC 480-123-030(1)(d), (f), and (g). Subsection (d) of WAC 480-123-030(1) requires ETCs to provide a substantive plan of the investments to be made with initial federal support and how the expenditures will benefit customers. This requirement does not apply to DISH Wireless as it is not a carrier that seeks high-cost support to fund investments to the networks but seeks ETC designation only for the purpose of receiving reimbursement for provision of subsidized low-income support services to qualified households. As stated in Section II of the Petition, DISH Wireless has made significant progress in building out the nation's first virtualized, cloud-native Open RAN-based 5G broadband network. In addition to this buildout, DISH Wireless is an approved provider in the ACP; as such, the Company is already providing investments to benefit customers. Therefore, DISH Wireless does not have any basis for filing a substantive investment plan and requests to be exempt from this requirement.

Subsection (f) of WAC 480-123-030(1) requires the petitioners to submit a map in .shp format of proposed service areas (exchanges) with existing and planned locations of cell sites and shading to indicate where the carrier provides and plans to provide commercial mobile radio service signals. The Company's service coverage area is defined by its underlying wireless carriers. As DISH Wireless has not completed its 5G buildout, the Company will continue to

utilize the underlying wireless carriers to provide comprehensive coverage in the service area. Therefore, DISH Wireless requests exemption from this requirement. Instead, DISH Wireless submits its current and proposed zip codes and ILEC exchanges as the service area the Company seeks ETC designation for the purpose of providing Lifeline to qualified residents of Washington.²⁶

Subsection (g) of WAC 480-123-030(1) state that the petition must contain information that demonstrates its ability to remain functional in emergency situation including information, including start generators and power capabilities. As stated above in Section VI, DISH Wireless has the ability to remain functional in emergency situations through the underlying wireless carriers. In addition, DISH Wireless does not own, control, or operate its underlying wireless carrier cell sites. Therefore, DISH Wireless requests to be exempt from this requirement to demonstrate reserve battery capacity or start generators.

V. DESIGNATING DISH WIRELESS AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST

The Commission will advance the public interest by designating the Company as an ETC so that it can offer the Gen Mobile-branded Lifeline services. Americans increasingly need greater access to voice and broadband services, and low-income Washington consumers in particular are suffering from the lack of affordable and available access, including those on Tribal lands. The Company is currently helping to close the gap by providing service under the ACP and stands ready to expand consumer choice and continue offering discounted services as a Lifeline ETC to customers who have come to rely on these benefits. Despite the successes of the

²⁶ Service area coverage is adjusted and expanded from time to time and DISH Wireless will provide updated service area as applicable.

ACP, the program is facing a wind-down due to lack of funding at the time of this filing and as directed by the FCC.²⁷ As such, granting ETC designation to DISH Wireless in Washington State is more imperative now to help keep those households most vulnerable in losing their connectivity should the ACP end. In addition, because DISH Wireless is deploying a new facilities-based wireless 5G network throughout the country, designating DISH Wireless as an ETC will improve its ability to apply for state broadband funding grants, should ETC designation be required, to increase service in underserved and unserved areas, including Tribal lands.

A. Advantages of Gen Mobile Lifeline Plans

Authorizing the Company as a Lifeline ETC in the State of Washington will enable the Company to provide eligible low-income consumers, including those residing on Tribal lands, with access to high quality mobile voice, text, and data services. This will increase those consumers' choices in service providers and service options and make essential communications services more affordable and accessible to these consumers. Mobile services are overwhelmingly preferred by Lifeline-eligible consumers who may be able to afford only a single connection, may frequently change residences or places of employment, and may need the ability to communicate with prospective employers. Some of these individuals may be experiencing homelessness and rely upon Lifeline service as their single reliable source of connectivity. Lifeline services also ensure that consumers always have the ability to contact 911 emergency services should the need arise. The availability of a no-charge Lifeline service that includes voice minutes, texts, and data is an invaluable resource for consumers in these circumstances.

²⁷ See *Affordable Connectivity Program to End Soon Barring Congressional Action*, WC Docket No. 21-450, Order, FCC DA 24-23 (rel. Jan. 11, 2024).

Gen Mobile Lifeline service plans provide meaningful options for low-income consumers because they offer low-cost, reliable alternatives to traditional rate plans. Among the Gen Mobile Lifeline offerings is a plan with 1,000 voice minutes, 1,000 texts, and 4.5 GB of data available to all qualifying low-income Washington consumers for no cost, and a plan with unlimited voice minutes, unlimited texts and 11 GB of data available to residents of Tribal lands for no cost. Qualified Washington consumers will have the choice to apply their Lifeline discount to existing Gen Mobile plans.

In addition, Gen Mobile Lifeline plans alleviate customer concerns regarding deposits, hidden costs, varying monthly charges, and long-term contract issues. Gen Mobile prepaid plans allow customers to subscribe to voice, text, and data services without the hurdle of a credit check or the commitment of a contract.

B. Benefits of Competitive Choice

Designating the Company as an ETC also meets the FCC's stated goals for promoting competition and increasing customer choice. The FCC has recognized that in non-rural areas, designation of multiple ETCs is "consistent per se with the public interest."²⁸ In rural and high-cost areas, the FCC determined that "designation of competitive ETCs promotes competition and benefits consumers . . . by increasing customer choice, innovative services, and new technologies."²⁹ In the Lifeline context, the entry of additional providers increases competitive choice for lower-income customers who may not be the focus of wireless carriers' marketing efforts. Launching Gen Mobile Lifeline options in Washington will add affordable, innovative

²⁸ *Federal-State Joint Board on Universal Service, Cellco Partnership d/b/a Bell Atlantic Mobile, Petition for Designation as an Eligible Telecommunications Carrier*, Memorandum, Opinion and Order, CC Docket No. 96-45, DA 00-2895, ¶ 14 (rel. Dec. 26, 2000).

²⁹ *See Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, Memorandum Opinion and Order, CC Docket No. 96-45, DA 00-2896, ¶ 17 (rel. Dec. 26, 2000).

mobile wireless choices to the marketplace, and could spur other ETCs to expand and improve their own Lifeline service offerings. Granting ETC designation to DISH Wireless will promote competition for the benefit of consumers and will have desirable effects upon the Washington market for Lifeline services by making these services more available and accessible, thereby supporting the goals of universal service.

VI. ANTI-DRUG ABUSE CERTIFICATION

In accordance with section 5301 of the Anti-Drug Abuse Act of 1988, DISH Wireless certifies that no party to the Petition is subject to denial of federal benefits, including FCC benefits.

VII. CONCLUSION

Based on the foregoing, designation of DISH Wireless as an ETC in the State of Washington accords with the requirements of Section 214(e)(2) of the Act and is in the public interest.

WHEREFORE, DISH Wireless respectfully requests that the Commission designate DISH Wireless as an ETC in the State of Washington for the purpose of participating in the Lifeline program.

Respectfully submitted,



Alison Minea
DISH Wireless L.L.C.

EXHIBIT 1: CERTIFICATION

I, Robert Yap, Vice President of Gen Mobile for DISH Wireless L.L.C., have reviewed and am familiar with the foregoing Petition for Designation as an Eligible Telecommunications Carrier in the State of Washington. The statements in the foregoing document are true of my own knowledge, except as to matters which are herein stated on information and belief, and as to those matters, I believe them to be true.

DISH Wireless L.L.C.

2/29/24
Date

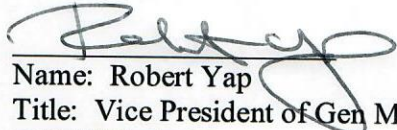

Name: Robert Yap
Title: Vice President of Gen Mobile
DISH Wireless L.L.C.

EXHIBIT 2: PROPOSED LIFELINE PLANS

<u>Subsidy Amount</u> (\$)	<u>Subsidy Type</u>	<u>Gen Mobile Lifeline Plan Offering</u>
9.25	Lifeline (Federal)	1,000 minutes of talk/voice, 1,000 text, and 4.5 GB of data
34.25	Lifeline (Federal and Tribal)	Unlimited talk & text, 11 GB of data

<u>Other Features Applicable to the Lifeline Plans</u>	<u>Cost (\$)</u>
Cost of excess minutes (Lifeline Basic)	\$5 for 500 minutes
Cost of excess minutes (Lifeline Tribal)	N/A as plan is unlimited
Cost of excess data	\$10 for 1 GB
Fee for calling 411	No added charges.
Fee for calling directory assistance	No added charges.
Restocking Fee	None
Deposit	None
Early Termination Fee	None
Nationwide Domestic Long Distance	No added charge.
Caller ID	No added charge.
Call Waiting	No added charge.
Call Forwarding	No added charge.
Voicemail	No added charge.
3-Way Calling	No added charge.
Rollover Unused Minutes/Text Option	N/A
Contract Needed ³⁰	No minimum term.
Credit Check Needed	No
Fee for calling 911	None

³⁰ Standard terms and conditions apply to service.

Fee for calling 611 (customer care)	None
Fee for calling N11 special service numbers (211, 311, 511, 711, and 811)	None

EXHIBIT 3: WASHINGTON SERVICE AREA

98001	98039	98107	98181	98245
98002	98040	98108	98188	98247
98003	98042	98109	98195	98248
98004	98043	98110	98198	98249
98005	98045	98112	98199	98250
98006	98047	98115	98201	98251
98007	98050	98116	98203	98252
98008	98051	98117	98204	98253
98010	98052	98118	98207	98255
98011	98053	98119	98208	98256
98012	98055	98121	98220	98257
98014	98056	98122	98221	98258
98019	98057	98125	98222	98260
98020	98058	98126	98223	98261
98021	98059	98133	98224	98262
98022	98065	98134	98225	98263
98023	98068	98136	98226	98264
98024	98070	98144	98229	98266
98026	98072	98146	98230	98267
98027	98074	98148	98232	98270
98028	98075	98154	98233	98271
98029	98077	98155	98235	98272
98030	98087	98158	98236	98273
98031	98092	98161	98237	98274
98032	98101	98164	98238	98275
98033	98102	98166	98239	98276
98034	98103	98168	98240	98277
98036	98104	98174	98241	98278
98037	98105	98177	98243	98279
98038	98106	98178	98244	98280

98281	98332	98372	98424	98533
98282	98333	98373	98430	98535
98283	98335	98374	98431	98536
98284	98336	98375	98433	98537
98286	98337	98376	98438	98538
98287	98338	98377	98439	98539
98288	98339	98380	98443	98541
98290	98340	98381	98444	98542
98292	98342	98382	98445	98546
98294	98345	98383	98446	98547
98295	98346	98385	98465	98548
98296	98349	98387	98466	98550
98297	98350	98388	98467	98552
98303	98351	98390	98498	98555
98304	98354	98391	98499	98557
98305	98355	98392	98501	98558
98310	98356	98394	98502	98560
98311	98357	98396	98503	98562
98312	98358	98402	98505	98563
98314	98359	98403	98506	98564
98315	98360	98404	98512	98565
98320	98361	98405	98513	98566
98321	98362	98406	98516	98568
98323	98363	98407	98520	98569
98325	98364	98408	98524	98570
98326	98365	98409	98526	98571
98327	98366	98413	98527	98572
98328	98367	98416	98528	98575
98329	98368	98418	98530	98576
98330	98370	98421	98531	98577
98331	98371	98422	98532	98579

98580	98617	98670	98834	98930
98581	98619	98671	98836	98932
98582	98620	98672	98837	98933
98583	98621	98673	98840	98934
98584	98624	98674	98841	98935
98585	98625	98675	98843	98936
98586	98626	98682	98844	98937
98587	98628	98683	98845	98938
98588	98629	98684	98846	98939
98589	98631	98685	98847	98940
98590	98632	98686	98848	98941
98591	98635	98801	98849	98942
98592	98638	98802	98850	98943
98593	98639	98812	98851	98944
98595	98640	98813	98853	98946
98596	98641	98814	98855	98947
98597	98642	98815	98856	98948
98601	98643	98816	98857	98950
98602	98644	98817	98858	98951
98603	98645	98819	98859	98952
98604	98647	98821	98860	98953
98605	98648	98822	98862	99001
98606	98649	98823	98901	99003
98607	98650	98826	98902	99004
98609	98651	98827	98903	99005
98610	98660	98828	98908	99006
98611	98661	98829	98921	99008
98612	98662	98830	98922	99009
98613	98663	98831	98923	99011
98614	98664	98832	98925	99012
98616	98665	98833	98926	99013

99014	99110	99143	99180	99329
99016	99111	99144	99181	99330
99017	99113	99146	99185	99333
99018	99114	99147	99201	99336
99019	99115	99148	99202	99337
99020	99116	99149	99203	99338
99021	99117	99150	99204	99341
99022	99118	99151	99205	99343
99023	99119	99152	99206	99344
99025	99121	99153	99207	99345
99026	99122	99154	99208	99346
99027	99123	99155	99212	99347
99029	99124	99156	99216	99348
99030	99125	99157	99217	99349
99031	99126	99158	99218	99350
99032	99128	99159	99223	99352
99033	99129	99160	99224	99353
99034	99130	99161	99252	99354
99036	99131	99163	99258	99356
99037	99133	99164	99260	99357
99039	99134	99166	99301	99360
99040	99135	99167	99320	99361
99101	99136	99169	99321	99362
99102	99137	99170	99322	99363
99103	99138	99171	99323	99371
99104	99139	99173	99324	99401
99105	99140	99176	99326	99402
99109	99141	99179	99328	99403

<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	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	Eureka
CenturyTel of Washington	Fall City
CenturyTel of Washington	Forks
CenturyTel of Washington	Gig Harbor
CenturyTel of Washington	Harrington
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	Montesano
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	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	Yacolt
CenturyTel of Washington	South Prairie
CenturyTel of Washington	Glenoma
CenturyTel of Washington	Mineral
CenturyTel of Washington	Packwood
CenturyTel of Washington	Randle
CenturyTel of Washington	McCleary
CenturyTel of Washington	Snoqualmie Pass
CenturyTel of Washington	ClearWater
CenturyTel of Washington	Lebam
CenturyTel of Washington	Pacific Beach
CenturyTel of Washington	Pe Ell
CenturyTel of Washington	Raymond
CenturyTel of Washington	Starbuck
CenturyTel of Washington	Royal City
Consolidated Communications of WA Co., LLC	Ellensburg
Consolidated Communications of WA Co., LLC	Selah
Consolidated Communications of WA Co., LLC	Yelm
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.	Curlew
Frontier Communications Northwest, Inc.	Everett
Frontier Communications Northwest, Inc.	Farmington
Frontier Communications Northwest, Inc.	Garfield
Frontier Communications Northwest, Inc.	George
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
Frontier Communications Northwest, Inc.	Richmond Beach
Frontier Communications Northwest, Inc.	Rockford
Frontier Communications Northwest, Inc.	Rosalia
Frontier Communications Northwest, Inc.	Silver lake
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.	Woodland
Frontier Communications Northwest, Inc.	Blaine
Frontier Communications Northwest, Inc.	Lynden
Frontier Communications Northwest, Inc.	Ferndale
Frontier Communications Northwest, Inc.	Sumas
Frontier Communications Northwest, Inc.	Everson
Frontier Communications Northwest, Inc.	Maple Falls
Frontier Communications Northwest, Inc.	Deming
Frontier Communications Northwest, Inc.	Acme
Frontier Communications Northwest, Inc.	Marblemount
Frontier Communications Northwest, Inc.	Concrete
Frontier Communications Northwest, Inc.	Arlington
Frontier Communications Northwest, Inc.	Burlington
Frontier Communications Northwest, Inc.	Cashmere
Frontier Communications Northwest, Inc.	Chelan
Frontier Communications Northwest, Inc.	Coupeville
Frontier Communications Northwest, Inc.	Darrington
Frontier Communications Northwest, Inc.	Entiat
Frontier Communications Northwest, Inc.	Fairfield
Frontier Communications Northwest, Inc.	Granite Falls
Frontier Communications Northwest, Inc.	Latah
Frontier Communications Northwest, Inc.	Leavenworth
Frontier Communications Northwest, Inc.	Mansfield
Frontier Communications Northwest, Inc.	Monroe

Frontier Communications Northwest, Inc.	Skykomish
Frontier Communications Northwest, Inc.	Stanwood
Frontier Communications Northwest, Inc.	Sultan
Frontier Communications Northwest, Inc.	Waterville
Frontier Communications Northwest, Inc.	Alger
Frontier Communications Northwest, Inc.	Big Lake
Frontier Communications Northwest, Inc.	Conway
Frontier Communications Northwest, Inc.	Custer
Frontier Communications Northwest, Inc.	Edison
Frontier Communications Northwest, Inc.	Grayland
Frontier Communications Northwest, Inc.	La Conner
Frontier Communications Northwest, Inc.	Laurel
Frontier Communications Northwest, Inc.	Lyman-Hamilton
Frontier Communications Northwest, Inc.	Sedro Woolley
Frontier Communications Northwest, Inc.	Westport
Frontier Communications Northwest, Inc.	Anacortes
Frontier Communications Northwest, Inc.	Camas-Washougal
Frontier Communications Northwest, Inc.	Camas-Washougal
Frontier Communications Northwest, Inc.	Camas-Washougal
Hat Island Telephone Company	Hat Island
Hood Canal Telephone Co., Inc.	Union
Inland Telephone Company	Dewatto
Inland Telephone Company	Prescott
Inland Telephone Company	Uniontown
Inland Telephone Company	Roslyn
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
Mashell Telecom Inc.	Kapowsin
McDaniel Telephone Company	Mossyrock
McDaniel Telephone Company	Salkum
McDaniel Telephone Company	Onalaska
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
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
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	Touchet
Qwest Corporation	Vancouver
Qwest Corporation	Waitsburg
Qwest Corporation	Walla Walla
Qwest Corporation	Warden
Qwest Corporation	Winlock
Qwest Corporation	Yakima
Qwest Corporation	Bellingham
Qwest Corporation	Easton
Qwest Corporation	Green Bluff
Qwest Corporation	Sequim
Skyline Telecom, Inc.	Mt Hull
Skyline Telecom, Inc.	Silverton
St John Co-Op Telephone & Telegraph Company	St John
Tenino Telephone Company	Tenino
Tenino Telephone Company	Bucoda
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
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
United Telephone Company of The Northwest	Paterson
United Telephone Company of The Northwest	Dallesport
Western Wahkiakum County Telephone Company	Grays River
Western Wahkiakum County Telephone Company	Naselle
Whidbey Telephone Company	Point Roberts
Whidbey Telephone Company	South Whidbey

EXHIBIT 4: SAMPLE ADVERTISEMENT

Buckslips 3.5" by 9.5"

genmobile™

FREE MOBILE SERVICE

See if you qualify for the Lifeline Program with Gen Mobile!

Apply Today

DISH Wireless LLC, is authorized to provide Lifeline service under the Gen Mobile brand. The Lifeline Program ("Lifeline") is a government assistance program that provides discounted telephone services to eligible households funded by the Federal Universal Service Fund. A household means adults and children who are living together at the same address as one economic unit. An economic unit includes all adults (persons of least 18 years old unless emancipated) contributing to and sharing the household's income and expenses. Only one discount per eligible household is permitted and is nontransferable to another person. The discount is tied to a single, primary residential address. Any household that violates the one discount per household rule or knowingly or willingly provides false information to obtain the Lifeline discount will lose its discount or will be banned from Lifeline and may be prosecuted by the government. There are two ways to qualify for the Lifeline discount: Program-Based or Income-Based. Program-Based qualification requires someone in the household to be enrolled in a public assistance program such as Medicaid, SNAP, Supplemental Security Income (SSI), or other qualifying government programs. Income-Based qualification requires the household's total annual gross income is at or less 135% of the Federal Poverty Guidelines. The National Verifier administered by the Universal Service Administrative Company (USAC) will determine whether the household meets the eligibility requirements to participate in Lifeline. Many factors beyond Gen Mobile's control (such as network problems or congestion, signal strength, structures, weather, geography, etc.) may affect the customer's ability to make and receive calls on the customer's wireless device, the quality of those calls, and the speed of the customer's service. As a result, the customer's service, including calls or attempted calls to emergency services like 911, may be interrupted, may fail, or result in dropped or blocked connections, become unavailable, service speeds are slow, or call quality at times may be poor. Go to genmobile.com for Gen Mobile's terms & conditions, including the full restrictions for Lifeline, and wireless service plans.

Banners 2' by 5'

genmobile™

FREE MOBILE SERVICE

See if you qualify for the Lifeline Program with Gen Mobile!

Apply Today

Gen Mobile LLC is authorized to provide Lifeline service under the Gen Mobile brand. The Lifeline Program ("Lifeline") is a government assistance program that provides discounted telephone service to eligible households funded by the Federal Universal Service Fund. This one discount program is provided to a household in a single program. To qualify, the customer must be enrolled in an eligible government program (Medicaid or SNAP) or have a household annual gross income that is at or less than 135% of the Federal Poverty Guidelines. The Bureau of Universal Service, administered by the Universal Service Administrative Company ("USAC") will determine whether the household meets the eligibility requirements to participate in Lifeline. Go to genmobile.com for Gen Mobile terms & conditions, including the full restrictions for Lifeline, and enrollment page.

Webpage Copy

genmobile [Return to Gen Mobile Main Site](#) [My Benefit Status](#) [Support](#) [Why Us?](#) [Español](#)

FREE MOBILE SERVICE

See if you qualify for the Lifeline Program to receive free mobile service from Gen Mobile!



Apply now in just 5 minutes!

Enter your zip code to start the application.

EXHIBIT 5: FINANCIAL STATEMENT (LINK TO 10-K)

Form 10-K of DISH Network Corporation, which wholly-owns DISH Wireless,
<https://ir.dish.com/sec-filings/sec-filing/10-k/0001558370-22-001816>.

See attached Financial Capability Letter from DISH Network Corporation.



Via Efiling Only

February 23, 2024

Ms. Kathy Hunter
Acting Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
PO Box 47250
Olympia, WA 98504-7250

Re: Petition of DISH Wireless L.L.C. for Designation as an ETC in the State of Washington for the Limited Purpose of Offering Lifeline Service to Qualified Households; Docket No. UT-230144

Dear Ms. Hunter,

As evidenced by Attachment A to this letter (Exhibit 21 and Exhibit 22 of DISH Network's 2022 Annual Report on Form 10-K filed with the Securities Exchange Commission), DISH Network Corporation is the indirect parent company of DISH Wireless, LLC. As a result of a recently completed merger, DISH Network Corporation is in turn owned by EchoStar Corporation. As a 100% owned subsidiary of DISH Network Corporation, DISH Wireless' financial reporting was consolidated into DISH Network Corporation's financial reporting and for future years will be consolidated into EchoStar Corporation. As a 100% owned subsidiary, EchoStar has an interest in the success of DISH Wireless LLC.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul Orban". The signature is fluid and cursive, written over a light blue horizontal line.

Paul Orban
EVP, Chief Financial Officer

Enclosures

ATTACHMENT A

Exhibit 21

**DISH NETWORK CORPORATION AND SUBSIDIARIES
LIST OF SUBSIDIARIES
As of December 31, 2022**

Subsidiary	State or Country of Incorporation	% of Ownership	Name Doing Business As
DISH Orbital Corporation	Colorado	100%	DOC
DISH DBS Corporation	Colorado	100%	DBS
DISH Network L.L.C.	Colorado	100% (1)	DNLLC
DISH Operating L.L.C.	Colorado	100% (1)	SATCO
Echosphere L.L.C.	Colorado	100% (1)	Echosphere
Dish Network Service L.L.C.	Colorado	100% (1)	DNSLLC
DISH Wireless Holding L.L.C.	Colorado	100%	DISH Wireless
DISH Wireless L.L.C.	Colorado	100% (2)	DISH Wireless
DISH Broadcasting Corporation	Colorado	100% (1)	DBC
DISH Technologies L.L.C.	Colorado	100% (1)	DTLLC
Sling TV Holding L.L.C.	Colorado	100% (1)	Sling TV

- (1) This is a subsidiary of DISH DBS Corporation
 (2) This is a subsidiary of DISH Wireless Holding L.L.C.

Exhibit 22

List of Guarantor Subsidiaries

The 11.75% Senior Secured Notes due 2027 issued by DISH Network Corporation (incorporated in Nevada) are jointly and severally guaranteed on a full and unconditional basis by the following 100% owned subsidiaries of DISH Network Corporation as of December 31, 2022:

Entity	Jurisdiction of Incorporation or Organization
ParkerB.com Wireless L.L.C. (1)	Colorado
DISH Wireless Holding L.L.C.	Colorado
DISH Orbital Corporation	Colorado
DBSD North America, Inc. (1)	Delaware
Blockbuster Holding L.L.C.	Colorado
dishNET Holding L.L.C.	Colorado
DISH Wireless L.L.C. (2)	Colorado
DISH Wireless Leasing L.L.C. (1)	Colorado
DISH Satellite Services Corporation	Delaware

- (1) This is a wholly-owned subsidiary of DISH Wireless Holding L.L.C.

The above Exhibits may be found at <https://ir.dish.com/node/34501/html#dish-20221231xex21.htm> and <https://ir.dish.com/node/34501/html#dish-20221231xex22.htm>.

EXHIBIT 6: KEY PERSONNEL BIOS

Robert Yap, VP of Gen Mobile, a DISH Wireless L.L.C. brand, has over 20 years of telecommunication experience. Mr. Yap was an executive at several telecommunications companies (wireless, CLEC, and calling cards), including at Gen Mobile, Inc. where he was a founder, and was a corporate attorney at McDermott, Will & Emory. From 2015 to 2017, he was the President of TruConnect Communications, Inc., a nationwide wireless Lifeline Provider with over 500,000 customers during his tenure. In 2018, Mr. Yap and his fellow executives founded Gen Mobile, Inc. (later acquired by DISH Wireless L.L.C.), to provide consumers affordable wireless service options and to help bridge the digital divide for the 30% of Americans that have limited access to the internet. He hopes to provide the same in the State of Washington with Gen Mobile as the head of the brand under DISH Wireless.

Mr. Yap also has served on several nonprofit boards including as chairman of the Asian Pacific Community Fund (“APCF”), a non-profit that has raised over \$5,000,000 for distribution to non-profits that serve communities in Los Angeles, and as a current board member of Center for Asian Americans United for Self-Empowerment (“CAUSE”), a non-profit dedicated to politically empowering the Asian Pacific American community. He also held leadership positions at Project by Project and the National Asian Pacific American Bar Association, and served in AmeriCorps at Public Allies Chicago.

Mr. Yap received his B.A. in Economics from Northwestern University and his J.D., with honors, from George Washington University School of Law.

Anthony Lombardo, Director and Head of Finance for Gen Mobile, is an experienced Finance and M&A professional. Prior to joining Gen Mobile, he worked with various early stage and venture backed start-ups as well as servicing private equity and strategic clients with buy-side and sell-side transaction support. He has experience supporting clients with needs in the CFO suite and finance operations and started his career at PricewaterhouseCoopers where he spent 13 years in both the audit and transaction support groups. Mr. Lombardo served as CFO at Gen Mobile, Inc. and is now the head of finance for the Gen Mobile brand.

Mr. Lombardo received his Bachelor of Science in Economics from The Wharton School at the University of Pennsylvania and his Master of Business Administration from the UCLA Anderson School of Management. Mr. Lombardo is also a licensed CPA (inactive) in the state of California.

Jennifer Lin, Head of Marketing, Gen Mobile, is a marketing and market research professional. She previously worked in market research at Farmers Insurance and was part of the team that launched online health insurance broker, HealthInsurance.com. Mr. Lombardo served as CFO at Gen Mobile, Inc. and is now the head of finance for the Gen Mobile brand.

Ms. Lin received her Bachelor’s degree from the University of California, Los Angeles and her M.P.H. from Boston University.

Jose Andrade, Head of Operations, Gen Mobile, has over 15 years of operational management experience at wireless telecommunications companies including from 2015-2018 as Director of Operations at TruConnect, a wireless Lifeline Provider with over 500,000 customers and from 2018-2021 as Director of Operations at Gen Mobile, Inc. His experience includes PMO leadership, customer service management, business optimization, data analysis, and leadership development. Mr. Andrade is responsible for day-to-day operations at Gen Mobile.

Mr. Andrade received his Business degree from the California State University-Los Angeles.

Sola Lee, Senior Corporate Counsel, Gen Mobile, has over 10 years of legal experience including as Counsel from 2015 to 2017 at TruConnect, a wireless Lifeline Provider with over 500,000 customers and from 2018-2021 at Gen Mobile, Inc. She was responsible for legal, regulatory, and compliance functions at TruConnect and Gen Mobile. Ms. Lee is the lead counsel for the Gen Mobile brand.

Ms. Lee graduated with a Bachelor's degree from the University of California, Davis and with a J.D. from the University of Oregon.

Vincent Buongiovanni, Head of Sales Operations – ACP/Lifeline, Gen Mobile, has over 10 years of experience in the wireless telecommunications industry, including managing the sales, operations, and compliance of Assurance Wireless' Affordable Connectivity Program and Lifeline Program nationwide, specifically managing the field agents used by the service provider. He also served as interim Director of Wireless at Assurance during the acquisition of Sprint by T-Mobile and is part-time police officer in Hi-Nella, New Jersey. Mr. Buongiovanni is in charge of the sales operations for ACP and Lifeline program for the Gen Mobile brand at DISH Wireless.

EXHIBIT 7: DISH'S BUILDOUT STATUS REPORT

See attached.



July 14, 2023

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Request for Confidential Treatment
WT Docket No. 22-212
Monitoring DISH's Compliance with Conditions Granting an Extension of Time to Complete Construction of Facilities and Buildout Commitments

Dear Ms. Dortch:

Pursuant to the provisions of Sections 0.457 and 0.459 of the Commission's rules governing submission of confidential materials,¹ and Freedom of Information Act ("FOIA") Exemption 4,² DISH Network Corporation ("DISH") respectfully requests that the Federal Communications Commission ("Commission") withhold from public inspection and give confidential treatment to the following materials submitted with this 5G Buildout Status Report³ (the "Confidential 5G Materials"):

- Polygon shapefiles showing DISH's 5G Coverage Area as of June 14, 2023;
- List of DISH 5G Sites (including information identifying individual sites, *e.g.*, latitude and longitude), spectrum deployed by band per sector, and antenna detail;
- Coverage maps illustrating DISH's 5G coverage as of June 14, 2023;
- Link budgets confirming DISH's 5G Coverage Area as of June 14, 2023;
- Table showing the location of DISH 5G Sites and the associated downlink bandwidth deployed at each site; and
- Radio specifications provided to DISH by its vendors.

FOIA Exemption 4 permits the Commission to withhold from public inspection "trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential."⁴ Commercial or financial information is confidential under FOIA if its disclosure is likely to cause substantial harm to the competitive position of the entity from which the

¹ 47 C.F.R. §§ 0.457, 0.459.

² 5 U.S.C. § 552(b)(4).

³ See Applications of American H Block Wireless L.L.C., DBSD Corporation, Gamma Acquisition L.L.C., and Manifest Wireless L.L.C. for Extension of Time, *Order of Modification and Extension of Time to Construct*, WT Docket No. 18-197, 35 FCC Rcd 9580 (WTB 2020).

⁴ See U.S.C. § 552(b)(4).

information was obtained.⁵ The D.C. Circuit has found parties do not have to “show actual competitive harm”⁶ to justify confidential treatment. Rather, “[a]ctual competition and the likelihood of substantial competitive injury” is sufficient to bring commercial information within the realm of confidentiality.⁷ Commission rules allow parties seeking to withhold materials from public inspection under FOIA Exemption 4 to request non-disclosure pursuant to the requirements of Section 0.459.⁸

DISH seeks confidential treatment of the Confidential 5G Materials because they contain the location and details of, among other things, DISH’s 5G wireless network base station deployments and performance throughout the United States. This information is commercial, proprietary, customarily guarded from competitors and not routinely available for public inspection. Further, this information is commercially sensitive and proprietary to our third-party Open RAN vendors. The confidential information contained in the Confidential 5G Materials could result in substantial competitive harm if disclosed. The information is not made available to the public, nor can it be readily obtained or deduced from other public sources.

Disclosure of the Confidential 5G Materials would be particularly harmful to DISH because of our status as a nascent competitor to the largest incumbent wireless carriers. DISH zealously guards information about its ongoing 5G deployment from incumbent competitors because its disclosure would give them an undue commercial advantage competing with DISH, which is a competitor in the consumer mobile wireless market. The Confidential 5G Materials thus qualify as “confidential commercial information” that “would customarily be guarded from competitors” and entitled to the automatic protection afforded by Section 0.457.⁹ DISH therefore requests that the Commission “not permit the inspection” of these materials.

DISH requests that these materials be withheld from public inspection under 47 C.F.R. § 0.459. In support of this request and pursuant to 47 C.F.R. § 0.459(b), DISH hereby states as follows:

1. The information for which confidential treatment is sought consists of the 5G Confidential Materials described above.¹⁰ Those materials are identified with the label “NOT FOR PUBLIC INSPECTION – CONFIDENTIAL TREATMENT REQUESTED” where appropriate. In the case of the polygon shapefiles transmitted via Box upload as Attachment B and the coverage maps transmitted via Box upload as Attachment C, we are unable to apply headers on such files, but

⁵ See *Nat’l Parks and Conservation Assoc. v. Morton*, 498 F.2d 765, 770 (D.C. Cir. 1974); *Critical Mass Energy Project v. NRC*, 975 F.2d 871, 879-90 (D.C. Cir. 1992).

⁶ *Public Citizen Health Research Group v. FDA*, 704 F.2d 1280, 1291 (D.C. Cir. 1983), quoting *Gulf & Western Industries v. U.S.*, 615 F.2d 527, 530 (D.C. Cir. 1979).

⁷ *Id.*

⁸ See 47 C.F.R. §§ 0.457(d)(2), 0.459.

⁹ 47 C.F.R. § 0.457(d)(2).

¹⁰ 47 C.F.R. § 0.451(b)(1).

the submissions and all corresponding data are designated as confidential in its entirety.

2. The information is commercial in character and confidential, closely guarded from competitors.¹¹
3. DISH guards this information from competitors because its disclosure would give them an undue commercial advantage in the competitive consumer mobile wireless market, in which DISH is a new entrant.¹²
4. Disclosure of this information would allow DISH's competitors to anticipate and respond to DISH's service offerings, thereby competitively disadvantaging DISH.¹³
5. DISH takes a number of measures to prevent unauthorized disclosure of this information. These measures include a prohibition on providing any of the information to any person outside DISH, its affiliates and advisors without adequate confidentiality protection, and the designation of all documents and emails containing any of this information as confidential.¹⁴
6. DISH requests that the confidential information be withheld from disclosure for an indefinite period. Because of the competitive nature of the consumer mobile wireless market and the granularity of the details about DISH's network in the Confidential 5G Materials, the future disclosure of this information could jeopardize the competitive position of DISH.¹⁵
7. Finally, DISH notes that a denial of its request would impair the Commission's ability to obtain this type of confidential information in the future, hampering its understanding of the consumer mobile wireless market. The ability of a government agency to obtain confidential information was at the heart of the legislative intent for developing exemptions from the Freedom of Information Act.¹⁶ The U.S. Court of Appeals for the D.C. Circuit has recognized a "private

¹¹ See 47 C.F.R § 0.459(b)(3).

¹² See 47 C.F.R § 0.459(b)(4).

¹³ See 47 C.F.R § 0.459(b)(5).

¹⁴ See 47 C.F.R § 0.459(b)(6).

¹⁵ See 47 C.F.R § 0.459(b)(8).

¹⁶ See *Critical Mass Energy Project v. NRC*, 975 F.2d 871, 878 (D.C. Cir. 1992) ("Where, however, the information is provided to the Government voluntarily, the presumption is that [the Government's] interest will be threatened by disclosure as the persons whose confidences have been betrayed will, in all likelihood, refuse further cooperation.").

interest in preserving the confidentiality of information that is provided to the Government on a voluntary basis.”¹⁷

DISH requests that the Commission return this submission if its request for confidentiality is denied.¹⁸ Please contact the undersigned at 202-463-3703 if you have any questions.

Sincerely,

/s/

Jeffrey H. Blum
Executive Vice President,
External and Legislative Affairs
DISH Network Corporation

¹⁷ *Id.* at 879.

¹⁸ *See* 47 C.F.R. § 0.459(e).

DISH NETWORK CORPORATION 5G BUILDOUT STATUS REPORT

American H Block Wireless L.L.C., DBSD Corporation, Gamma Acquisition L.L.C., ParkerB.com Wireless L.L.C., and Manifest Wireless L.L.C., each a wholly-owned subsidiary of DISH Network Corporation (collectively, “DISH”), provide this 5G Buildout Status Report. This report, submitted pursuant to the Wireless Telecommunications Bureau’s (“Bureau”) *Order of Modification and Extension of Time to Construct*, demonstrates that DISH has satisfied the June 14, 2023 AWS H Block, AWS-4, 600 MHz, and Lower 700 MHz E Block deployment obligations set forth in the *Order* and has satisfied the requirements for contingent extensions of the final buildout deadlines applicable to these bands.¹

DISH is pleased to certify that, as of June 14, 2023, we offer 5G Broadband Service² to **246,470,035** people in the United States. This coverage equals **73.56 percent** of the total U.S. population based on the 2020 U.S. Census with respect to DISH’s AWS-4, AWS H Block, and 600 MHz licenses; and DISH covers 72.64 percent of the population in those markets where DISH holds a Lower 700 MHz E Block license:

DISH Licenses	U.S. POPs (2020 Census)	DISH-Covered POPs	Percentage of POPs Covered
AWS-4	335,073,176	246,470,035	73.56
AWS H Block	335,073,176	246,470,035	73.56
600 MHz	335,073,176	246,470,035	73.56
Lower 700 MHz E Block	258,642,608	187,869,746	72.64

In addition, by offering 5G Broadband Service to more than 70 percent of the U.S. population, DISH has also met the criteria to receive an additional two years to meet the applicable final buildout deadlines for its AWS-4, AWS H Block and Lower 700 MHz E Block licenses. In particular, because, as of June 14, 2023, DISH was offering 5G Broadband Service with respect to the AWS-4 and AWS H Block licenses to greater than 50 percent of the U.S. population, and to greater than 50 percent of the total U.S. population covered by DISH’s Lower 700 MHz E Block licenses, the *Order* provides that the applicable final buildout deadlines for these licenses are automatically extended to June 14, 2025 (the

¹ See Applications of American H Block Wireless L.L.C., DBSD Corporation, Gamma Acquisition L.L.C., and Manifest Wireless L.L.C. for Extension of Time, *Order of Modification and Extension of Time to Construct*, WT Docket No. 18-197, 35 FCC Rcd 9580, 9586-9587 (WTB 2020) (the “*Order*”) (if DISH is offering 5G Broadband Service with respect to its AWS-4, AWS H Block, or Lower 700 MHz E Block licenses to greater than 50% of the U.S. population by 6/14/2023, then DISH’s final construction deadlines for the AWS-4, AWS H Block, and Lower 700 MHz E Block licenses shall be, respectively, automatically extended to 6/14/2025).

² “5G Broadband Service” is defined in the *Order* as a service that is “at least 3GPP Release 15 capable of providing Enhanced Mobile Broadband (eMBB) functionality.” *Order*, 35 FCC Rcd at 9581, 9586, 9594, 9604.

“Contingent Extensions”).³ DISH certifies that it has met all of the requirements to receive the Contingent Extensions.

DISH further certifies compliance with the Nationwide 5G Broadband Commitment to deploy a nationwide 5G network using DISH’s spectrum with (i) at least 70 percent of the U.S. population having access to download speeds equal to or greater than 35 Mbps (as will be verified by a drive test); (ii) at least 15,000 5G Sites deployed; and (iii) at least 30 MHz of DISH’s downlink 5G spectrum averaged over all DISH 5G Sites deployed nationwide.

DISH’s user equipment offering includes the Motorola Edge Plus 2023, an advanced 5G smartphone. It operates on, among other spectrum frequencies, DISH’s AWS-4, AWS H Block, 600 MHz, and Lower 700 MHz E Block spectrum licenses. The coverage calculations and link budgets in this 5G Buildout Status Report are based upon the technical specifications and performance of this device.

I. Background/Summary

In 2019, DISH asked the Federal Communications Commission to extend the construction deadlines associated with its AWS-4, AWS H Block and Lower 700 MHz E Block licenses and committed to an accelerated deployment of its 600 MHz licenses. DISH’s request was made, among other things, to facilitate and expedite its entry into the wireless market as a nationwide facilities-based competitor with a “first-of-its-kind 5G network built from the ground up with an architecture that can take full advantage of expected 5G functionality.”⁴ As part of the extension request, and consistent with those plans, the Bureau imposed, and DISH accepted, several conditions on those licenses.⁵

Among other things, DISH committed that, no later than June 14, 2023, it would offer 5G Broadband Service to at least 70 percent of the U.S. population that is covered by DISH’s 600 MHz licenses (Band-Specific Commitment #1), AWS-4 licenses (Band-Specific Commitment #4), 700 MHz E Block licenses (Band-Specific Commitment #6), and AWS H Block licenses (Band-Specific Commitment #8).⁶ Further, DISH committed to file a report within 30 days of the date of each commitment with information about the status of its efforts to meet the terms of that commitment.

With this 5G Buildout Status Report, DISH reports on Band-Specific Commitments #1, #4, #6, and #8, and certifies that it has satisfied all four commitments: as of June 14, 2023, DISH was offering 5G Broadband Service to at least 70 percent of the U.S. population covered by its AWS-4, AWS H Block, and 600 MHz licenses and the portion of the U.S. population covered by its Lower 700 MHz E Block licenses.

³ *Order*, 35 FCC Rcd at 9600-01.

⁴ *Id.* at 9594.

⁵ In granting the requested extensions, the Commission conditioned DISH’s AWS-4, AWS-H Block and 700 MHz E Block licenses on the satisfaction of those commitments. *See id.* at 9585.

⁶ *See Order*, 35 FCC Rcd at 9599.

DISH further certifies that it has satisfied the Nationwide 5G Broadband Commitment because, as of June 14, 2023, it has deployed a nationwide 5G network using DISH’s spectrum with:

- at least 70 percent of the U.S. population having access to download speeds equal to or greater than 35 Mbps, as will be verified by a drive test;
- at least 15,000 5G Sites deployed; and
- at least 30 MHz of DISH’s downlink 5G spectrum averaged over all DISH 5G sites deployed nationwide.⁷

DISH has achieved these milestones through deployment of a cloud-native, standalone 5G wireless network, consistent with Open Radio Access Network (“O-RAN”) specifications and 3rd Generation Partnership Project (“3GPP”) standards. This represents a significant industry first and DISH is the only operator anywhere in the world to deploy this type of wireless network. As DISH continues to deploy and increase coverage with this first-of-its-kind network, it will expand the availability of competitive services offered to both consumer and business customers, increasing competitive pressure on the incumbent carriers. This will benefit American consumers and promote U.S. technology leadership with the rest of the world.

II. Band-Specific and Nationwide 5G Commitments

A. Band-Specific Commitments

Band-Specific Commitments #1, #4, #6 and #8 require DISH to “offer 5G Broadband Service to at least 70% of the U.S. population ... no later than 6/14/2023”⁸ with respect to its 600 MHz, AWS-4, AWS H Block, and 700 MHz E Block licenses.⁹ Because DISH’s 700 MHz E Block licenses cover fewer people in the United States than its AWS-4 and H Block licenses, we report population coverage separately for each band:

DISH Licenses	U.S. POPs (2020 Census)	DISH-Covered POPs	Percentage of POPs Covered
AWS-4	335,073,176	246,470,035	73.56
AWS H Block	335,073,176	246,470,035	73.56
600 MHz	335,073,176	246,470,035	73.56
Lower 700 MHz E Block	258,642,608	187,869,746	72.64

⁷ Order, 35 FCC Rcd at 9598-99.

⁸ Order, 35 FCC Rcd at 9599.

⁹ In the case of the 700 MHz E Block licenses, where DISH lacks a nationwide footprint, DISH’s obligation is to cover 70% of the U.S. population “who are covered by DISH’s Lower 700 MHz E Block Licenses.” *Id.*

The service DISH is offering meets the definition of 5G Broadband Service included in the *Order*, which is “at least 3GPP Release 15 capable of providing Enhanced Mobile Broadband (eMBB) functionality.”¹⁰ DISH’s 5G network offers 5G Broadband Service throughout a “5G Coverage Area,” which the *Order* specifies is “that area included within the bounds of the polygon shapefile representing geographic coverage for 5G service with coverage based on DISH’s ordinary course coverage analysis.”¹¹

DISH’s 5G network coverage (as reflected in the polygon shapefiles submitted as Confidential Attachment B to this 5G Buildout Status Report) reflects the availability of DISH’s 5G Broadband Service using eMBB on DISH’s own core and using its own spectrum, as of June 14, 2023. DISH did not rely upon any third-party network coverage or spectrum for purposes of demonstrating coverage.

B. Nationwide 5G Deployment Commitment

DISH certifies compliance with the Nationwide 5G Deployment Commitment¹² to deploy a nationwide 5G network using DISH’s spectrum with:

- (i) at least 70 percent of the U.S. population having access to download speeds equal to or greater than 35 Mbps, as verified by a drive test;
- (ii) at least 15,000 5G Sites deployed; and
- (iii) at least 30 MHz of DISH’s downlink 5G spectrum averaged over all DISH 5G Sites deployed nationwide.

i. Verification of Average Download Speeds

DISH certifies that, as of June 14, 2023, it has deployed a nationwide 5G network using DISH’s spectrum with at least 70 percent of the U.S. population having access to download speeds equal to or greater than 35 Mbps. As provided in the *Order*, this element of the Nationwide 5G Deployment Commitment will be verified by a drive test. The drive test will utilize the Motorola Edge Plus 2023 and an industry-standard methodology mutually agreed to by DISH and the Bureau.¹³

ii. Verification of At Least 15,000 5G Sites

DISH certifies that, as of June 14, 2023, it has met this element of the Nationwide 5G Deployment Commitment, having deployed a total of 16,399 DISH 5G Sites. All of the DISH 5G Sites offer 5G Broadband Service as defined by the *Order* using the DISH AWS-4, AWS H Block, and 600 MHz licenses, as well as the Lower 700 MHz E Block in those markets where DISH holds a Lower 700

¹⁰ *Order*, 35 FCC Rcd at 9604.

¹¹ *Id.*

¹² *Id.* at 9598-99.

¹³ *Id.*

MHz E Block license.

iii. Verification of 30 MHz of Deployed DISH Spectrum

DISH certifies that, as of June 14, 2023, it has deployed a nationwide 5G network using DISH's spectrum with at least 30 MHz of DISH's downlink 5G spectrum averaged over all DISH 5G Sites deployed nationwide.

C. Supporting Data for Commitments

To demonstrate that DISH has met its 2023 5G commitments, this submission includes the following information:

- In **Attachment A**, a statement quantifying the U.S. Population covered by DISH's 5G Coverage Area as of June 14, 2023;¹⁴
- In **Confidential Attachment B**, polygon shapefiles showing DISH's 5G Coverage Area as of June 14, 2023, which are being provided confidentially to the Commission as part of a separate submission. The shapefiles meet the electronic formatting standards set forth in prior FCC guidance for construction notices for 700 MHz licenses and in the data specifications for the Broadband Data Collection ("BDC").¹⁵

For each band covered in this report (AWS-4, AWS H Block, 600 MHz, and Lower 700 MHz E Block), DISH is submitting shape files that show:

- (1) The location of DISH 5G Sites; and
- (2) DISH's 5G coverage within the licensed market.

DISH is also including shapefiles that show 600 MHz coverage at the PEA level, with individual polygon layers corresponding to the channel blocks in the 600 MHz band where DISH holds a license.

- In **Confidential Attachment C**, coverage maps illustrating DISH's 5G coverage as of June 14, 2023, which are being provided confidentially to the Commission as part of a separate submission.
- In **Confidential Attachment D**, a list of DISH 5G Sites (including information identifying individual sites, e.g., latitude and longitude), spectrum deployed by band per sector, and antenna

¹⁴ "U.S. Population" is defined in the *Order* as "the population of the United States (including the 50 states, Puerto Rico, and the U.S. territories) reported in either the 2010 U.S. Census (312,846,492) or the 2020 U.S. Census (which is expected to be reported in 2021). In its sole discretion, DISH may choose whether to utilize the 2010 or 2020 versions of the U.S. Census in calculating its compliance with its commitments, but DISH must apply the same population total and population distributions to all calculations uniformly." *Id.* at 9605.

¹⁵ See *Wireless Telecommunications Bureau Establishes Electronic Map Format for Covered 700 MHz Band Licensee Construction Notifications*, Public Notice, DA 15-1193 (Oct. 16, 2015).

details, which is being provided confidentially to the Commission as part of a separate submission.¹⁶ All of the DISH 5G Sites in Confidential Attachment D offer 5G Broadband Service as defined in the *Order* using DISH’s AWS-4, AWS H Block, and 600 MHz licenses, and the Lower 700 MHz E Block licenses in those markets where DISH holds a Lower 700 MHz E Block license.

- In **Attachment E**, an engineering statement and the link budgets used to confirm DISH’s 5G Coverage Area as of June 14, 2023. The link budgets are being provided confidentially to the Commission as part of a separate submission.
- In **Confidential Attachment F**, a table of DISH 5G Sites indicating the bandwidth of DISH downlink 5G spectrum deployed at each site, which shows that DISH has deployed at least 30 MHz of DISH’s downlink 5G spectrum averaged over all DISH 5G Sites deployed nationwide. This table is being provided confidentially to the Commission as part of a separate submission. Each DISH 5G Site has at least 50 MHz of DISH downlink 5G spectrum through the deployment of n66 (20 MHz at 2180-2200 MHz), n70 (25 MHz at 1995-2020 MHz), and at least 5 MHz of downlink spectrum in the 600 MHz band (n71). In the geographic areas where DISH holds the 700 MHz E Block, each DISH 5G Site has at least 55 MHz of DISH downlink 5G spectrum with the addition of n29 (5 MHz).
- In **Confidential Attachment G**, the radio specifications for the six radios currently deployed in DISH’s 5G network, which are being provided confidentially to the Commission as part of a separate submission.
- In **Attachment H**, a certification from Heather Campbell, Senior Vice President, National RF Engineering, that the representations in this DISH Network Corporation 5G Buildout Status Report, including the polygon shapefiles and Attachments A-G, are true and correct.

In the sections below, we describe our user equipment and offerings, the 5G spectrum bands we have deployed, and the radio access network installed at our 5G Sites.

III. Network Deployment

A. User Equipment and 5G Broadband Service

In May 2022, DISH commercially launched Project Genesis, which offers 5G data service using eMBB. Project Genesis initially offered service in Las Vegas before launching in cities across the U.S. As of June 14, 2023, the DISH 5G Sites in Attachment D were offering 5G Broadband Service using DISH’s AWS-4, AWS H Block, 600 MHz, and, where DISH has the license in the market, Lower 700 MHz E Block licenses.

Within DISH’s 5G Coverage Area, the Project Genesis user device is the Motorola Edge Plus 2023, an advanced 5G smartphone supporting, among other things, 3GPP Band n70 (which includes

¹⁶ “5G Sites” is defined in the *Order* as “macro sites on which 5G radios are deployed.” *Order*, 35 FCC Rcd at 9604.

DISH's AWS H Block downlink spectrum at 1995-2020 MHz and DISH's lower AWS-4 downlink spectrum at 2000-2020 MHz) and Band n29 (722-728 MHz downlink). This smartphone also supports 3GPP Band n66, which includes DISH's upper AWS-4 downlink spectrum (2180-2200 MHz), along with DISH's 600 MHz spectrum (3GPP Band n71), which is both uplink and downlink.

Project Genesis is available to anyone in a qualifying location, and offers unlimited 5G data and voice services for \$25/month. Consumers can visit <https://launch.genesis5g.com/> to learn about current service areas and sign up. Customers are prequalified based on the service address they provide, to make sure they are within DISH's 5G coverage footprint. The address is assigned a latitude and longitude point coordinate using a third-party geocoding service. This point is then compared to the current DISH 5G Coverage Area. If the coordinate point is within the DISH 5G Coverage Area, the customer may proceed with the enrollment process. The coverage information provided in this 2023 Buildout Status Report depicts the coverage footprint used to qualify a Project Genesis customer. As noted above, the Motorola Edge Plus 2023 supports 3GPP Bands n66, n70, n29, and n71, among other bands.

DISH continues to work with a number of other vendors to certify devices on our 5G network. In selected markets, the Motorola G 5G (2022), Motorola G Stylus 5G, Celero 5G+, and Samsung A23 may be used for DISH 5G voice and data. In addition, in September 2022, Apple released specifications for the iPhone 14, which included support for 3GPP Bands n29 and n70, although the device has not yet been certified for use on our 5G network.¹⁷

B. Spectrum and 3GPP Band Support

As of June 14, 2023, each DISH 5G Site offered service using, among other things, the DISH AWS-4, AWS H Block, 600 MHz, and 700 MHz E Block spectrum licenses. Every DISH 5G Site is capable of providing service over the following 3GPP bands, among others:

- Band n71 (600 MHz for downlink and uplink)
- Band n29 (722-728 MHz downlink)
- Band n70 (1995-2020 MHz downlink)
- Band n66 (2180-2200 MHz downlink)

For purposes of demonstrating compliance with the June 14, 2023 5G Commitments, DISH relied upon its national footprint of 600 MHz licenses (3GPP Band n71) as the network's primary serving cell to provide uplink network communications.

To provide enhanced quality of service beyond the 2023 DISH 5G commitments, DISH is deploying additional Carrier Aggregation ("CA") combinations using multiple downlink bands, and is also beginning to roll out support for Band n70's 1695-1710 MHz uplink resource (through a lease with the licensees). The possible CA combinations available for each of the DISH 5G Sites are shown in Confidential Attachment D. The CA combinations include two bands (such as 3GPP Band n71 600

¹⁷ See Apple, iPhone 14 and iPhone 14 Plus - Tech Specs (last visited July 12, 2023), available at <https://www.apple.com/iphone-14/specs/>. See also Apple, Apple introduces iPhone 14 and iPhone 14 Plus, <https://www.apple.com/newsroom/2022/09/apple-introduces-iphone-14-and-iphone-14-plus/> (last visited July 12, 2023).

MHz downlink + 3GPP Band n66 2180-2200 MHz downlink), as well as three-band CA combinations such as n70+n71+n66.

C. 5G Sites Radio Access Network Technology

The DISH O-RAN architecture consists of Radio Units (“RUs”), which are deployed on our 5G Sites, and Distributed Units (“DUs”), which control the RUs. Each DU is located at or near the base of the 5G Site. Currently, Fujitsu and Samsung provide the RUs for our network while Mavenir and Samsung provide the DUs for our network. The DUs interface with Centralized Units (“CUs”), which are hosted in a data center. These combined network elements provide a RAN solution that handles all radio level control and subscriber data traffic. This architecture is compliant with both 3GPP Release 15 and relevant O-RAN specifications.

i. Radio Units

DISH’s 5G Sites are deployed with either Fujitsu radios or Samsung radios. DISH deploys radio models from each of those two vendors, and all such radios are O-RAN compliant and support the O-RAN 7.2x split. DISH’s multi-vendor deployment exemplifies the flexibility that O-RAN offers – for example, DISH 5G Sites can have a Fujitsu radio paired with a Mavenir DU, and others can have a Fujitsu radio paired with a Samsung DU.

For purposes of determining coverage, we have validated that the performance of the deployed Fujitsu and Samsung radios are substantially similar. The link budgets and shapefiles provided are based upon the Fujitsu radios, but DISH has confirmed through lab and field testing that the Samsung radios perform as well as the Fujitsu radios. Approximately 85 percent of the deployed radios are Fujitsu and approximately 15 percent are Samsung.

Fujitsu radios:

- Dual Band RU (FCC ID CFD5GRUDB3)
- Dual Band RU (FCC ID CFD5G2RUDB)
- Tri Band RU (FCC ID CFD5GRUTB)
- Tri Band RU (FCC ID CFD5G2RUTB)

Samsung radios:

- Dual Band RU (FCC ID A3LRF4451D-70A)
- Tri Band RU (FCC ID A3LRF4450T-71A)

Specifications for the six RUs are included as Confidential Attachment G.

ii. Antennas

Approximately 86 percent of DISH’s 5G Sites utilize either the (i) JMA Wireless NWAVTM X-Pol 8-Port Antenna (model number MX08FRO665-21), or the (ii) CommScope 8-port sector antenna (model number FFVV-65B-R2) supporting all DISH component carriers in its different bands. The remaining 5G Sites utilize other antennas suitable for special cases, for example where there is less than normal usable vertical space on the tower.

iii. Compliance with 3GPP Release 15 Standards

DISH's 5G network complies with the following 3GPP Release 15 standards consistent with the commitments adopted in the *Order*.¹⁸

Standard	Description
3GPP TS 38.300	5G; NR; Overall Description; Stage 2
3GPP TS 38.104	5G; NR; Base Station (BS) Radio Transmission and Reception
3GPP TS 38.141-1	5G; NR; Base Station (BS) Conformance Testing Part 1
3GPP TS 38.321	5G; NR; Medium Access Control (MAC) Protocol Specification
3GPP TS 38.322	5G; NR; Radio Link Control (RLC) Protocol Specification
3GPP TS 38.323	5G; NR; Packet Data Convergence Protocol (PDCP) Specification
3GPP TS 37.324	Evolved Universal Terrestrial Radio Access (E-UTRA) and NR; Service Data Adaptation Protocol (SDAP) Specification
3GPP TS 38.331	5G; NR; Radio Resource Control (RRC) Protocol Specification
3GPP TS 38.401	5G; NG-RAN; Architecture Description
3GPP TS 38.420	5G; NG-RAN; Xn General Aspects and Principles
3GPP TS 38.421	5G; NG-RAN; Xn Layer 1
3GPP TS 38.422	5G; NG-RAN; Xn Signaling Transport
3GPP TS 38.423	5G; NG-RAN; Xn Application Protocol (XnAP)
3GPP TS 38.424	5G; NG-RAN; Xn Data Transport

V. CONCLUSION

As of June 14, 2023, DISH is offering 5G Broadband Service to more than 70 percent of the U.S. population using its AWS-4, AWS H Block, and 600 MHz licenses, and more than 70 percent of the U.S. population associated with its Lower 700 MHz E Block licenses; has satisfied each of the elements of the 2023 Nationwide 5G Broadband Commitment and Band-Specific Commitments #1, #4, #6 and #8; and has satisfied the requirements for Contingent Extensions of the final buildout deadlines applicable to these bands.

¹⁸ See *Order*, 35 FCC Rcd at 9581, 9586, 9594, 9604.

ATTACHMENT A: STATEMENT OF POPULATION COVERED

The calculations described herein, made consistent with the requirements of the *Order*, demonstrate that as of June 14, 2023, DISH's 5G network covered **73.56 percent** of the U.S. population.¹⁹ For purposes of this report, DISH is relying on 2020 U.S. Census data, which reports the total U.S. Population as 335,073,176. This is the population number used as the denominator to calculate coverage percentages for DISH's AWS-4, AWS H Block, and 600 MHz licenses. DISH holds Lower 700 MHz E Block licenses in all but eight license areas. Therefore, for the Lower 700 MHz E Block licenses, DISH used 258,642,608 as the population denominator. The basis for DISH's population calculations is set forth below in Table 1 (basis for total U.S. population) and Table 2 (basis for population coverage of DISH's Lower 700 MHz E Block licenses).

DISH's signal coverage analysis was calculated using network design elements within the Planet (by Infovista) tool, version 7.6. DISH used the Planet P3M propagation model, which is a 3D model that supports the spectrum bands deployed by DISH.

DISH utilized three sets of detailed geodata to develop the network design within the Planet tool:

- 1 meter resolution data with 3D building polygons for Core Dense Urban areas with a Digital Surface Model;
- 5 meter resolution with 2.5D clutter height per bin information for outer Dense Urban/Urban/Suburban areas; and
- 10 meter resolution data with average clutter height per market for remaining areas

To further improve the P3M propagation model's accuracy, DISH acquired Continuous Wave measurements (through drive testing) to fine-tune the propagation model parameters. This process included:

- Collecting required inputs (such as geodata and accurate transmitter locations) that were used to gather CW data;
- Configuring the model (matching the frequency used when collecting the drive test data with the frequency in the propagation model);
- Tuning the propagation model;
- Investigating discrepancies between the drive test data and the prediction layer (if any); and
- Validating the propagation model parameters using standard industry practices.

¹⁹ While the polygon shapefiles associated with this filing depict the lower-48 contiguous states, DISH used the entire U.S. population (including all 50 states, Puerto Rico, and the U.S. territories) in calculating the percentage of the U.S. population covered.

After the coverage analysis was completed, DISH utilized the FCC’s “centroid” methodology²⁰ to calculate the resulting covered population. Following this methodology, all geographic polygons with wireless coverage were overlaid onto the U.S. map of census blocks. Census blocks are the smallest unit of tabulation geography defined by the U.S Census Bureau. Each census block was marked as “covered” if the centroid of the census block (the calculated center point of the census block) was within the coverage polygon. If the centroid was covered by the polygon, then all of the population associated with that census block was counted as covered and included in DISH’s covered population calculation. If the centroid was not within the coverage polygon, then the population associated with that census block was not included in DISH’s covered population calculation.

Table 1: Total U.S. Population Calculation

U.S. State/Territory	2020 U.S. Census POPs
United States (50 states)	331,449,281
Puerto Rico	3,285,874
U.S. Virgin Islands	87,146
American Samoa	49,710
Guam	153,836
Northern Mariana Islands	47,329
Total	335,073,176

Table 2: Lower 700 MHz E Block Total Population

Market No.	Market Name	2020 U.S. POPs
<i>Total 2020 U.S. POPs</i>		335,073,176
BEA003	Boston-Worcester MA-NH-RI-VT	(8,815,492)
BEA010	NYC-Long Is. NY-NJ-CT-PA-MA-VT	(28,020,320)
BEA012	Phil.-Atl. City PA-NJ-DE-MD	(8,075,733)
BEA160	LA-Riverside-Orange County CA-AZ	(20,684,708)

²⁰ See, e.g., *FCC Releases Data on Mobile Broadband Deployment as of December 31, 2015 Collected Through FCC Form 477*, Public Notice, DA 16-1107, ¶ 12 (Sept. 30, 2016).

Market No.	Market Name	2020 U.S. POPs
BEA163	San Fran.-Oakland-San Jose CA	(10,583,440)
BEA173	Guam-Northern Mariana Islands	(201,165)
BEA175	American Samoa	(49,710)
BEA176	Gulf of Mexico	0
	TOTAL 700 MHz E Block POPs	258,642,608

ATTACHMENT B: SHAPEFILES
(confidential; submitted separately)

ATTACHMENT C: COVERAGE MAPS
(confidential; submitted separately)

ATTACHMENT D: LIST OF DISH 5G SITES
(confidential; submitted separately)

ATTACHMENT E:
ENGINEERING STATEMENT AND CONFIDENTIAL LINK BUDGETS

This exhibit shows the engineering methodology and assumptions used to confirm that DISH's 5G Coverage Area offers 5G Broadband Service to at least 70 percent of the U.S. population using its AWS-4, AWS H Block, and 600 MHz licenses, and at least 70 percent of the U.S. population associated with its Lower 700 MHz E Block licenses. DISH's predicted 5G coverage calculations are based on outdoor coverage and industry-standard practices. For purposes of the submitted link budgets, DISH modeled coverage calculations on the Motorola Edge Plus 2023.

In a separately submitted confidential Microsoft Excel spreadsheet, DISH provides four separate link budgets based on the following 3GPP bands: (i) Band n29 (for 722-728 MHz); (ii) Band n66 (for DISH's licensed 2180-2200 MHz); (iii) Band n70 (for DISH's licensed 1995-2020 MHz); and (iv) Band n71 (600 MHz). Each link budget calculates the minimum signal strength at the cell edge for each of DISH's owned channel bandwidths per 3GPP band.

ATTACHMENT F: TABLE OF DISH DOWNLINK SPECTRUM BY SITE
(confidential; submitted separately)

ATTACHMENT G: DISH 5G RADIO SPECIFICATIONS
(confidential; submitted separately)

ATTACHMENT H: ENGINEER CERTIFICATION

DECLARATION OF HEATHER CAMPBELL

I, Heather Campbell, am an engineering executive employed by DISH Network Corporation (“DISH”). I have reviewed and helped prepare the foregoing DISH NETWORK CORPORATION 5G BUILDOUT STATUS REPORT and certify as follows:

1. I am Senior Vice President of National Radio Frequency Engineering for DISH. In this role, I lead the national radio frequency (RF) engineering and planning, regulatory services, and spectrum coordination teams.
2. I have a Bachelor of Science, with honors, in Electrical Engineering and a Bachelor of Science in Computer Engineering from North Carolina State University. I also hold a Professional Engineer license and am licensed in seven states.
3. Before joining DISH, I had a 19-year career with Sprint-Nextel, where I led a variety of initiatives, including long-term network strategy planning, spectrum harvesting, radio access network (RAN) transition, and RF engineering. Most recently, I served as Vice President, Access Networks for Rogers Communications, where I helped launch Canada’s first and largest 5G network and led their national network engineering, planning and design efforts.
4. I hereby certify that the representations in the DISH NETWORK CORPORATION 5G BUILDOUT STATUS REPORT, including the polygon shapefiles and Attachments A-G, are true and correct to the best of my information, knowledge and belief. My certification is based upon my personal knowledge and information provided to me.



Heather Campbell

Senior Vice President of National Radio Frequency Engineering
DISH Network Corporation

Dated: July 14, 2023