

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of

PREPAID WIRELESS GROUP, LLC  
d/b/a PWG

Seeking Designation as an Eligible  
Telecommunications Carrier on a Wireless  
(Lifeline Only) Basis

DOCKET UT-240828

ORDER 01

GRANTING PETITION FOR  
DESIGNATION AS ELIGIBLE  
TELECOMMUNICATIONS CARRIER  
DESIGNATION AND EXEMPTIONS  
FROM WAC 480-123-030(1)(d), (f), (g)

**BACKGROUND**

- 1 On October 31, 2024, Prepaid Wireless Group, LLC d/b/a PWG (PWG or Company) filed a petition with the Washington Utilities and Transportation Commission (Commission) requesting designation as an Eligible Telecommunications Carrier (ETC) pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the Act), and Washington Administrative Code (WAC) 480-123-030. PWG seeks ETC designation in Washington for the purpose of receiving federal Low Income (Lifeline) support that subsidizes monthly charges for telecommunications service for qualified low-income households. Lifeline support is part of the Federal Universal Service Fund (FUSF). The Company is a reseller of facility based wireless services. PWG also requests an exemption from Washington Administrative Code 480-123-030(1)(d), (f), and (g), which require ETC applicants to file a substantive investment plan, wireless network maps, and certification on backup power capabilities.
- 2 On March 4, 2025, the Company filed responses to Commission Staff’s (Staff) requests which helped to clarify and supplement the petition including providing the Tribal Lifeline details.
- 3 The proposed Lifeline rate plans comply with the Federal Communications Commission’s (FCC’s) minimum service standards.<sup>1</sup> Plan includes:
  - Free SIM Card.
  - Free calls to 611.
  - Free calls to 911.

---

<sup>1</sup> See <https://www.usac.org/lifeline/rules-and-requirements/minimum-service-standards/>.

- Free calls to 411 Directory Assistance.
- Free access to Caller ID, Call Waiting, 3-Way Calling, and Voicemail.
- Nationwide Coverage including ability to use minutes for Domestic LD.

4 The details of PWG’s proposed Lifeline and Tribal Lifeline rate plans are as follows:

<b>Plan Type</b>	<b>Monthly Minutes</b>	<b>Monthly Text Messages</b>	<b>Monthly Data Usage Allowances</b>	<b>Net Cost to Qualifying Customers</b>
Basic Lifeline	1,000	Unlimited	4.5 GB	\$0.00
Tribal Lifeline	Unlimited	Unlimited	6.5 GB	\$0.00

5 Customers can purchase additional airtime from the Company.  
The monthly “Top-Up” prices are as follows:

<b>Current Voice</b>	<b>Current Data</b>	<b>Price</b>
250	250 MB	\$5.00
None	1.5 GB	\$10.00
Unlimited	1.0 GB	\$10.00
Unlimited	3.0 GB	\$20.00
Unlimited	8.0 GB	\$30.00

6 PWG has been designated as an ETC in two states (New York and Wisconsin) and offers commercial mobile radio service by using its own facilities in conjunction with reselling the network services of T-Mobile. The Company currently has applications pending for ETC designation in two states including Florida and Washington.

7 Commission Staff agrees with Prepaid Wireless Group that the Company meets the requirements of the Washington rule on ETC designation, WAC 480-123-030, except subsections (1)(d), (f) and (g).

8 Staff also agrees with and recommends granting Prepaid Wireless Group’s request for exemptions from the filing requirements of WAC 480-123-030(1)(d), (f), and (g).

9 Staff recommends that the Commission set conditions consistent with its past Orders designating resold Lifeline Only ETCs.

10 This matter came before the Commission at its March 27, 2025, Open Meeting.

### DISCUSSION

11 Common carriers receiving designation as ETCs under 47 U.S.C. § 214 are eligible to receive funds from the federal USF for Lifeline services. State utility commissions are responsible for designating common carriers as ETCs for the purpose of receiving such funds, and may impose conditions on a common carrier so designated.<sup>2</sup> The Commission will approve petitions from carriers requesting ETC designation if the petition meets the requirements of WAC 480-123-030, the designation will advance some or all of the purposes of universal service found in 47 U.S.C. § 254, and the designation is in the public interest.<sup>3</sup>

12 Under 47 U.S.C. § 214(e)(2), state commissions may designate more than one carrier as an ETC in an area if such designation is “consistent with the public interest, convenience, and necessity” and the carrier seeking designation as an ETC meets the following two requirements of 47 U.S.C. § 214(e)(1):

- (A) Offer the services that are supported by federal universal service support mechanisms under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and
- (B) Advertise the availability of such services and the charges therefor using media of general distribution.<sup>4</sup>

13 Prepaid Wireless Group is a common carrier. The Company is capable of providing services supported by federal universal service mechanisms, as defined in 47 C.F.R. § 54.101(a) by using its own network elements in conjunction with reselling its underlying

---

<sup>2</sup> *In the Matter of the Petition of TracFone Wireless, Inc. for Exemption from WAC 480-123-030(1)(d),(f) and (g); and Designation as an Eligible Telecommunications Carrier for the Purpose of Receiving Lifeline Support from the Federal Universal Service Fund*, Order 03 (June 24, 2010), UT-093012, ¶ 78.

<sup>3</sup> WAC 480-123-040.

<sup>4</sup> 47 U.S.C. § 214(e)(1).

network carrier's services as well. The Company also commits that it will advertise the availability of Lifeline services.

- 14 Staff recommends that Prepaid Wireless Group should qualify for ETC designation with the proposed conditions in Appendix A. Staff reviewed the Company's technical and financial capabilities to provide the supported Lifeline service and carefully considered relevant factors suggested in the FCC's Lifeline and Link Up Reform Order. Based on the Company's operational history and Company financial statements Staff concludes that the Company is technically and financially capable of providing the supported Lifeline service in compliance with the low-income program rules.
- 15 We accept Staff's review and recommendation that Prepaid Wireless Group has the technical and financial capabilities to provide the supported Lifeline service.
- 16 The Company meets the requirements of the Washington rule on ETC designation, WAC 480-123-030; except subsections (1)(d), (f) and (g):
- WAC 480-123-030(1)(d) requires an ETC petitioner to provide a "substantive plan of the investments to be made with initial federal support during the first two years in which support is received and a substantive description of how those expenditures will benefit customers." PWG requests an exemption from the requirement because the company is seeking ETC designation for the limited purpose of providing Lifeline service and is not seeking high-cost support to construct its own facilities.
  - WAC 480-123-030(1)(f) requires a wireless ETC petitioner to provide "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." PWG requests an exemption from the requirement because it does not operate its own wireless cell sites or facilities, instead the company relies on the underlying wireless carriers to provide comprehensive coverage in the service area.
  - WAC 480-123-030(1)(g) requires a wireless ETC to have "a reasonable amount of backup power (fixed, portable or other backup power source) for its cell sites, and backup power for its switches as prescribed in WAC 480-120-411(3) for LEC central offices" PWG requests an exemption from the

requirement as it is a resale-only provider, and thus will rely on the emergency response capabilities, including backup power, of its underlying carriers.

17 We agree with Staff's recommendation to grant the Company's request for exemptions from the three requirements under WAC 480-123-030 listed above. Granting the request is consistent with the public interest, the purposes underlying regulation, and applicable statutes.<sup>5</sup>

18 The FCC's National Lifeline Accountability Database and the National Lifeline Eligibility Database (aka the National Verifier or NV) are fully functional. We accept Staff's recommendation that the Commission set conditions consistent with past Orders designating ETCs.<sup>6</sup>

19 Staff is correct that certain additional conditions should be imposed on Prepaid Wireless Group as we have done when designating other similarly situated ETCs in Washington. Attachment 2 to this order provides the Company specific guidance on our expectations for regulatory compliance, customer service, consumer protection, and various reporting requirements that will ensure Staff can monitor Prepaid Wireless Group's operations for strict adherence to all ETC requirements.

## FINDINGS AND CONCLUSIONS

20 (1) The Commission has jurisdiction over the subject matter of this order and is authorized to designate Eligible Telecommunications Carriers in Washington under 47 U.S.C. § 214(e)(2), 47 C.F.R. § 54.201(b)-(c), and WAC 480-123.

21 (2) Prepaid Wireless Group is a telecommunications company seeking to do business in the state of Washington. Prepaid Wireless Group meets the requirements for designation as an ETC because the company provides services supported by

---

<sup>5</sup> The Commission granted these exemptions in other orders designating Lifeline-only ETC's. *See supra* fn. 6.

<sup>6</sup> *In the Matter of the Petition of SAGE TELECOM COMMUNICATIONS, LLC, d/b/a TRUCONNECT, Petitioner, Seeking Designation as an Eligible Telecommunications Carrier in the state of Washington pursuant to 47 U.S.C. § 214(e)(2) (Low Income Only)*, Order 01 (May 7, 202), Docket UT-190744 at 8; *Granting Eligible Telecommunications Carrier Designation With Conditions and Exemption From Rule Order 01* at 8 (May 7, 2020); *In the Matter of the Petition of AIR VOICE WIRELESS, LLC, d/b/a AIRTALK WIRELESS, Seeking Designation as an Eligible Telecommunications Carrier in the state of Washington pursuant to 47 U.S.C. § 214(e)(2) (Low Income Only)*, Order 01 (September 29, 2022), Docket UT-220276 at 7.

federal universal support mechanisms and because Prepaid Wireless Group has committed to advertise the availability of its services and the charges therefore using media of general distribution. Prepaid Wireless Group's designation as an ETC will advance the purpose of universal service because Prepaid Wireless Group will offer voice telephony services and broadband services, which facilitate universal service. Prepaid Wireless Group has also demonstrated that its designation as an ETC is in the public interest.

- 22 (3) The Commission may grant an exemption from any of its rules if consistent with the public interest, the purposes underlying regulation, and applicable statutes. Prepaid Wireless Group has demonstrated that the requirements of WAC 480-123-030(1)(d), (f), and (g) should not apply to the Company and that granting the requested exemption is in the public interest and consistent with applicable laws, rules, and orders.
- 23 (4) This matter came before the Commission at its regularly scheduled meeting on March 27, 2025.

## ORDER

### THE COMMISSION ORDERS:

- 24 (1) Prepaid Wireless Group, LLC d/b/a PWG's Petition is GRANTED such that Prepaid Wireless Group, LLC d/b/a PWG shall be designated as an Eligible Telecommunications Carrier ETC for the purpose of receiving Lifeline support from the Federal Universal Service Fund subject to the conditions specified in Appendix A in the service areas specified in Appendix B.
- 25 (2) Prepaid Wireless Group, LLC d/b/a PWG's request for exemptions from WAC 480-123-030(1)(d), (f), and (g), as described in Prepaid Wireless Group's Petition, is hereby GRANTED.
- 26 (3) The Commission retains jurisdiction over this matter for purposes of effectuating this order.

The Commissioners, having determined this Order to be consistent with the public interest, directed the Secretary to enter this Order.

DATED at Lacey, Washington, and effective March 27, 2025.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

JEFF KILLIP  
Executive Director and Secretary