



UT-230144

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Jeff Killip  
Executive Director and Secretary  
Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA

Re: Third Amended Petition of DISH Wireless L.L.C. dba Gen Mobile; Docket No. UT-230144

Dear Mr. Church,

Attached please find for filing, this Third Amended Petition of DISH Wireless L.L.C. dba Gen Mobile for Designation as an Eligible Telecommunications Carrier, in addition to a waiver request for WAC 480-123-030(1)(d), (f), and (g). This Third Amended Petition is intended to replace in its entirety all previously filed Petition and Amendments filed under Docket No. UT-230144.

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

Sincerely,

Sola Lee  
Senior Corporate Counsel

Adrian Johnson  
Associate Corporate Counsel

Enclosures

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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

**THIRD 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**

Alison Minea  
Vice President and Associate General Counsel  
DISH Wireless L.L.C.  
1110 Vermont Ave NW Ste. 450  
Washington, DC 20005  
(202) 463-3709  
Alison.Minea@dish.com

January 9, 2025

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**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

DISH Wireless L.L.C.	)	
Third Amended Petition for Designation as an	)	
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Customers	)	

**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”),<sup>1</sup> Sections 54.101 through 54.207<sup>2</sup> of the Rules of the Federal Communications Commission (“FCC”),<sup>3</sup> and the rules and regulations of the Washington Utilities and Transportation Commission (the “Commission”), hereby submits this Third Amended 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 First Amended Petition filed on March 1, 2024, and the Second Amended Petition filed on July 19, 2024. The Company seeks ETC designation for the limited purpose of providing Lifeline service under the Gen Mobile brand to qualifying Washington consumers including those residing on federally recognized Tribal lands.

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<sup>1</sup> 47 U.S.C. § 214(e)(2).

<sup>2</sup> 47 C.F.R. §§ 54.101-54.207.

<sup>3</sup> 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 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:

Alison Minea  
Vice President and Associate General Counsel  
DISH Wireless L.L.C.  
1110 Vermont Ave NW Ste. 450  
Washington, DC 20005  
(202) 463-3709  
Alison.Minea@dish.com

## **II. COMPANY OVERVIEW**

DISH Wireless L.L.C. is a Colorado limited liability company with a principal address at 5701 S. Santa Fe Dr., Littleton, CO 80120. 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,<sup>4</sup> is a connectivity company headquartered in Colorado that has served as a disruptive

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<sup>4</sup> 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>.

force in the pay-TV market since 1980. In 2020, DISH Wireless entered the retail wireless business by acquiring the Boost 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 areas.

As DISH Wireless continues the construction of its 5G network, the Company has been competing in the retail wireless space and was an approved provider in the Federal Communications Commission's Affordable Connectivity Program ("ACP").<sup>5</sup> 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, including plans bundling voice, text messaging, and broadband services. Available Gen Mobile plans include talk, text, and data at various data speeds starting as low as \$10 per month. DISH Wireless has an application for ETC designation pending with the FCC for the states that rely upon the FCC to decide ETC designations (the "Non-Jurisdictional States"). DISH Wireless has an application for ETC designation pending with the FCC for the states of Connecticut, Delaware, Maine, New Hampshire, North Carolina, and the District of Columbia (the "Non-Jurisdictional States"). DISH Wireless is currently designated as a wireless ETC in Alabama, Alaska, Arizona, Arkansas, Colorado, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa,

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<sup>5</sup> On March 4, 2024 the FCC issued Public Notice DA 24-194 which details the final month of the Affordable Connectivity Program ("ACP") which was set for May 31, 2024, *available* at <https://docs.fcc.gov/public/attachments/DA-24-195A1.pdf>.

Kentucky, Louisiana, Maryland, Michigan, Minnesota, Mississippi, Missouri, Nebraska, Nevada, New York, North Dakota, Ohio, Oklahoma, Rhode 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 have filed or 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 including those residing on Tribal lands, and (ii) 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.<sup>6</sup> 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 21<sup>st</sup> 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.<sup>7</sup> Under the Act, a state public utility commission, like the Commission, with jurisdictional authority over ETC designations must designate a common

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<sup>6</sup> A complete description of the Gen Mobile terms, conditions and rates applicable for supported services can be found at <https://www.genmobile.com>.

<sup>7</sup> 47 U.S.C. § 214(e)(2).



carrier as an ETC if the carrier satisfies the requirements of Section 214(e)(1). Therefore, the Commission has the authority to designate the Company as an ETC. As demonstrated below, DISH Wireless fulfills the requirements to be designated as an ETC in Washington.

#### **IV. THE COMPANY MEETS THE REQUIREMENTS FOR ETC DESIGNATION**

An application 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 applicant 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 applicant 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 applicant 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 applicant requests to be designated as an ETC; and (5) a certification that neither the applicant, nor any party to the application, is subject to a denial of federal benefits pursuant to the Anti-Drug Abuse Act of 1988.<sup>8</sup>

In addition, an applicant 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

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<sup>8</sup> 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).

quality standards; and (4) demonstrate that it is financially and technically capable of providing Lifeline service.<sup>9</sup>

Finally, prior to designating a carrier as an ETC, the Commission must determine whether such designation is in the public interest.<sup>10</sup> When making a public interest determination, the Commission considers the benefits of increased consumer choice and the unique advantages and disadvantages of the applicant's service offerings.<sup>11</sup>

**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.<sup>12</sup> 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

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<sup>9</sup> 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 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.

<sup>10</sup> 47 U.S.C. § 214(e)(6); 47 C.F.R. § 54.202(b).

<sup>11</sup> 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).

<sup>12</sup> 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).

implemented 911 or enhanced 911 systems; and (4) toll limitation services to qualifying low-income consumers.<sup>13</sup> As defined in Section 8.1(b) of the FCC's rules, DISH Wireless also provides broadband internet access service to consumers.<sup>14</sup>

**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.<sup>15</sup> DISH Wireless is currently providing and will provide mobile voice, text messaging, and broadband services to low-income consumers. The various Lifeline service plans that will be available to qualifying low-income Washington residents 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. The Company has deployed, and continues to deploy, its advanced nationwide 5G broadband service in over 130 cities (including in Washington) and currently offers service to more than 70 percent of the U.S. population.<sup>16</sup> In areas of Washington where service on DISH Wireless' own network is available and the customer has a compatible device, Gen Mobile can provide the customer service on the DISH Wireless network. DISH Wireless, including under the Gen Mobile brand, will also provide service on a resale basis. This will allow DISH Wireless to immediately introduce new Lifeline options for Washington consumers as soon as the Commission approves this Petition. 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

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<sup>13</sup> 47 C.F.R. § 54.101(a); *see also* 47 U.S.C. § 214(e)(1)(A).

<sup>14</sup> *See* 47 C.F.R. § 8.1(b).

<sup>15</sup> *See* 47 C.F.R. § 54.101(a).

<sup>16</sup> *See* PR Newswire, The DISH 5G Network is Now Available to Over 70 Percent of the U.S. Population, June 15, 2023.

that are designated for federal universal support using a combination of its own facilities and/or resale of another carrier's services. Therefore, DISH Wireless satisfies the applicable facilities-based requirement for ETCs, including in the State of Washington. Because DISH Wireless meets the facilities-based requirement 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*.<sup>17</sup>

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

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 Wireless 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 coverage footprint by zip code is attached hereto as Exhibit 3.

**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. 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. The Company's marketing efforts will be consistent with and in compliance with the Commission's rules and the Company will make any necessary

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<sup>17</sup> See *2012 Lifeline Reform Order*, ¶ 368.

changes to its advertising materials in the event the Commission implements new requirements. 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 carriers' wireless service. Gen Mobile can also support customers on DISH Wireless's own 5G network facilities provided the customer has a compatible device. The partner carriers' networks 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 promptly 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 application for designation as an ETC. DISH Wireless is in a unique position, however, because it is constructing its own facilities-based 5G wireless network subject to FCC-approved buildout milestones, including having already deployed its 5G broadband service to more than 70% of the U.S. population by June 14, 2023 (including in Washington). 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 applicant'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.

**I. Ability to Remain Functional During Emergencies**

The Company's services are designed to remain operational during 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, which is not limited by traditional technologies, providing greater flexibility and resilience in the event of service outages. Additionally, DISH Wireless partners with mobile virtual network operators (MVNO) whose networks are built to function even without external power sources. These networks are capable of rerouting traffic around damaged facilities and managing traffic surges during emergencies. DISH Wireless also has back up batteries and the capability to deploy mobile generators to its cell for continued operation.

**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.<sup>18</sup> DISH Wireless satisfies these criteria.

DISH Wireless is financially capable of honoring its service obligations to customers, as shown in Exhibit 5, a link to the Form 10-K of EchoStar, as well as meeting its federal and state regulatory obligations. 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

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<sup>18</sup> See *2012 Lifeline Reform Order*, ¶ 387; see also 47 C.F.R. § 54.202(a)(4).

position the Company to expand its operations to serve currently unserved/underserved eligible low-income Washington consumers, including those residing 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. 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 or sells 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.

In 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 Tribal Lifeline 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 purchase a 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.

**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).<sup>19</sup>

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.

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.<sup>20</sup>

**M. DISH Wireless Will Comply With All Regulations Imposed or Adopted by the Commission**

By way of this Petition, DISH Wireless hereby declares its ability and goal to comply with all the rules and regulations that the Commission may lawfully impose or adopt 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.

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<sup>19</sup> *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>).

<sup>20</sup> 47 C.F.R. §§ 54.405(e), 54.410(f).

## **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 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.

DISH Wireless contracts with third party vendors to supplement USAC's own processes and procedures, and the Company will continue to use Emerios Enterprise Services Inc. ("Emerios") software to process Lifeline applications to assist with validating the Company's subsidy data to prevent duplicate subsidies. DISH Wireless will also continue to utilize its

established back office real time review process for in-person applications to be completed before a Lifeline application is passed to the National Verifier to qualify a customer. In addition, DISH Wireless will also continue to use experienced staff, including third party outsource companies, to provide review of the Company's in-person Lifeline enrollments.

**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) but only as it pertains to its underlying carriers. 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, AT&T and T-Mobile. 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 exchanges as the service area the Company seeks ETC designation for the purpose of providing Lifeline to qualified residents of Washington.<sup>21</sup>

Subsection (g) of WAC 480-123-030(1) requires that the petition include information demonstrating the ability to remain functional in emergency situations, including details about start generators and power capabilities. As stated in this Petition, DISH Wireless will be offering Lifeline services using a combination of its own facilities and resale of its underlying carriers' network. With regard to its own facilities, DISH Wireless has demonstrated the compliance of WAC 480-123-030(1)(g).<sup>22</sup> However, as it pertains to its underlying carriers' facilities, DISH Wireless does not own, control, or operate the cell sites of its underlying carriers. Therefore, DISH Wireless seeks a waiver from this requirement specifically for its underlying carriers cell sites, and does not need 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, including those residing on Tribal lands, in particular are suffering from the lack of affordable and available access. In addition, because DISH Wireless is deploying a new facilities-based wireless 5G network

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<sup>21</sup> Service area coverage is adjusted and expanded from time to time and DISH Wireless will provide updated service area as applicable.

<sup>22</sup> See *supra* Section III.I.

throughout the country over the next several years, 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.

**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.

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."<sup>23</sup> 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."<sup>24</sup> 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 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.

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<sup>23</sup> *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).

<sup>24</sup> *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).

## **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,


A handwritten signature in black ink, appearing to read "Alison Minea", is written over a horizontal line.

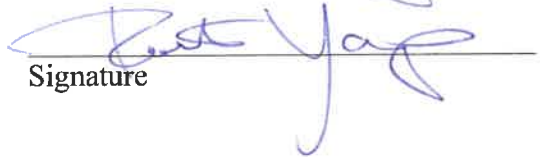
Alison Minea  
DISH Wireless L.L.C.

### EXHIBIT 1: DECLARATION

I, Robert Yap, Senior Vice President of Gen Mobile for DISH Wireless L.L.C., declare under penalty of perjury under the law of Washington that the foregoing is true and correct.

Signed on this 7<sup>th</sup> day of January, 2025.  
at El Segundo, CA

  
\_\_\_\_\_  
Print Name

  
\_\_\_\_\_  
Signature

Robert Yap



## EXHIBIT 2: PROPOSED LIFELINE PLANS

<u>Subsidy Amount</u> <u>(\$)</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

**EXHIBIT 3: WASHINGTON COVERAGE AREA ZIP CODES AND EXCHANGES**

98001	98058	98168	98256	98321
98002	98059	98174	98257	98323
98003	98065	98177	98258	98325
98004	98068	98178	98260	98326
98005	98070	98181	98261	98327
98006	98072	98188	98262	98328
98007	98074	98195	98263	98329
98008	98075	98198	98264	98330
98010	98077	98199	98266	98331
98011	98087	98201	98267	98332
98012	98092	98203	98270	98333
98014	98101	98204	98271	98335
98019	98102	98207	98272	98336
98020	98103	98208	98273	98337
98021	98104	98220	98274	98338
98022	98105	98221	98275	98339
98023	98106	98222	98276	98340
98024	98107	98223	98277	98342
98026	98108	98224	98278	98345
98027	98109	98225	98279	98346
98028	98110	98226	98280	98349
98029	98112	98229	98281	98350
98030	98115	98230	98282	98351
98031	98116	98232	98283	98354
98032	98117	98233	98284	98355
98033	98118	98235	98286	98356
98034	98119	98236	98287	98357
98036	98121	98237	98288	98358
98037	98122	98238	98290	98359
98038	98125	98239	98292	98360
98039	98126	98240	98294	98361
98040	98133	98241	98295	98362
98042	98134	98243	98296	98363
98043	98136	98244	98297	98364
98045	98144	98245	98303	98365
98047	98146	98247	98304	98366
98050	98148	98248	98305	98367
98051	98154	98249	98310	98368
98052	98155	98250	98311	98370
98053	98158	98251	98312	98371
98055	98161	98252	98314	98372
98056	98164	98253	98315	98373
98057	98166	98255	98320	98374
				98375

98376	98506	98583	98644	98837
98377	98512	98584	98645	98840
98380	98513	98585	98647	98841
98381	98516	98586	98648	98843
98382	98520	98587	98649	98844
98383	98524	98588	98650	98845
98385	98526	98589	98651	98846
98387	98527	98590	98660	98847
98388	98528	98591	98661	98848
98390	98530	98592	98662	98849
98391	98531	98593	98663	98850
98392	98532	98595	98664	98851
98394	98533	98596	98665	98853
98396	98535	98597	98670	98855
98402	98536	98601	98671	98856
98403	98537	98602	98672	98857
98404	98538	98603	98673	98858
98405	98539	98604	98674	98859
98406	98541	98605	98675	98860
98407	98542	98606	98682	98862
98408	98546	98607	98683	98901
98409	98547	98609	98684	98902
98413	98548	98610	98685	98903
98416	98550	98611	98686	98908
98418	98552	98612	98801	98921
98421	98555	98613	98802	98922
98422	98557	98614	98812	98923
98424	98558	98616	98813	98925
98430	98560	98617	98814	98926
98431	98562	98619	98815	98930
98433	98563	98620	98816	98932
98438	98564	98621	98817	98933
98439	98565	98624	98819	98934
98443	98566	98625	98821	98935
98444	98568	98626	98822	98936
98445	98569	98628	98823	98937
98446	98570	98629	98826	98938
98465	98571	98631	98827	98939
98466	98572	98632	98828	98940
98467	98575	98635	98829	98941
98498	98576	98638	98830	98942
98499	98577	98639	98831	98943
98501	98579	98640	98832	98944
98502	98580	98641	98833	98946
98503	98581	98642	98834	98947
98505	98582	98643	98836	98948

98950	99034	99134	99170	99326
98951	99036	99135	99171	99328
98952	99037	99136	99173	99329
98953	99039	99137	99176	99330
99001	99040	99138	99179	99333
99003	99101	99139	99180	99336
99004	99102	99140	99181	99337
99005	99103	99141	99185	99338
99006	99104	99143	99201	99341
99008	99105	99144	99202	99343
99009	99109	99146	99203	99344
99011	99110	99147	99204	99345
99012	99111	99148	99205	99346
99013	99113	99149	99206	99347
99014	99114	99150	99207	99348
99016	99115	99151	99208	99349
99017	99116	99152	99212	99350
99018	99117	99153	99216	99352
99019	99118	99154	99217	99353
99020	99119	99155	99218	99354
99021	99121	99156	99223	99356
99022	99122	99157	99224	99357
99023	99123	99158	99252	99360
99025	99124	99159	99258	99361
99026	99125	99160	99260	99362
99027	99126	99161	99301	99363
99029	99128	99163	99320	99371
99030	99129	99164	99321	99401
99031	99130	99166	99322	99402
99032	99131	99167	99323	99403
99033	99133	99169	99324	

<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 Quinalt
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”



# FREE MOBILE SERVICE

See if you qualify for Gen Mobile's  
**FREE Talk, Text & Data**

See below for more details.

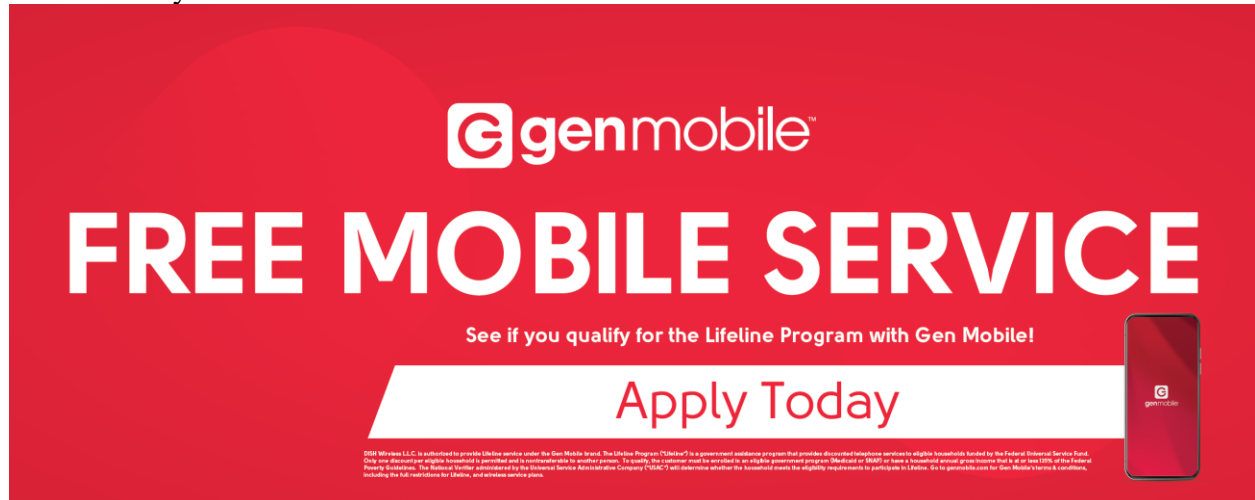


The Lifeline Program ("Lifeline") is a federal government assistance program by the Federal Communications Commission ("FCC") that provides discounted mobile services to eligible households. You may be eligible for Lifeline based on income or other qualifying criteria. All Lifeline plans will have at least 1,000 voice minutes, 1,000 text messages, and 4.5 GB of data. Qualified residents in some states may receive more data based on additional state funding. There is only one monthly discount for your Lifeline-supported service per household, and it is not transferable to another person. You must use your Lifeline service at least once per 30 days or you will be disenrolled from the program. Lifeline Gen Mobile plans do not include international/domestic roaming. To learn more about Lifeline, visit [www.lifelinesupport.org](http://www.lifelinesupport.org). Customers are subject to Gen Mobile's and Lifeline's terms & conditions. Visit [genmobile.com/terms](http://genmobile.com/terms) for Gen Mobile terms & conditions, which are subject to change at any time.

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IGMLFLY0624

## Banners 2' by 5'




**genmobile™**

# FREE MOBILE SERVICE

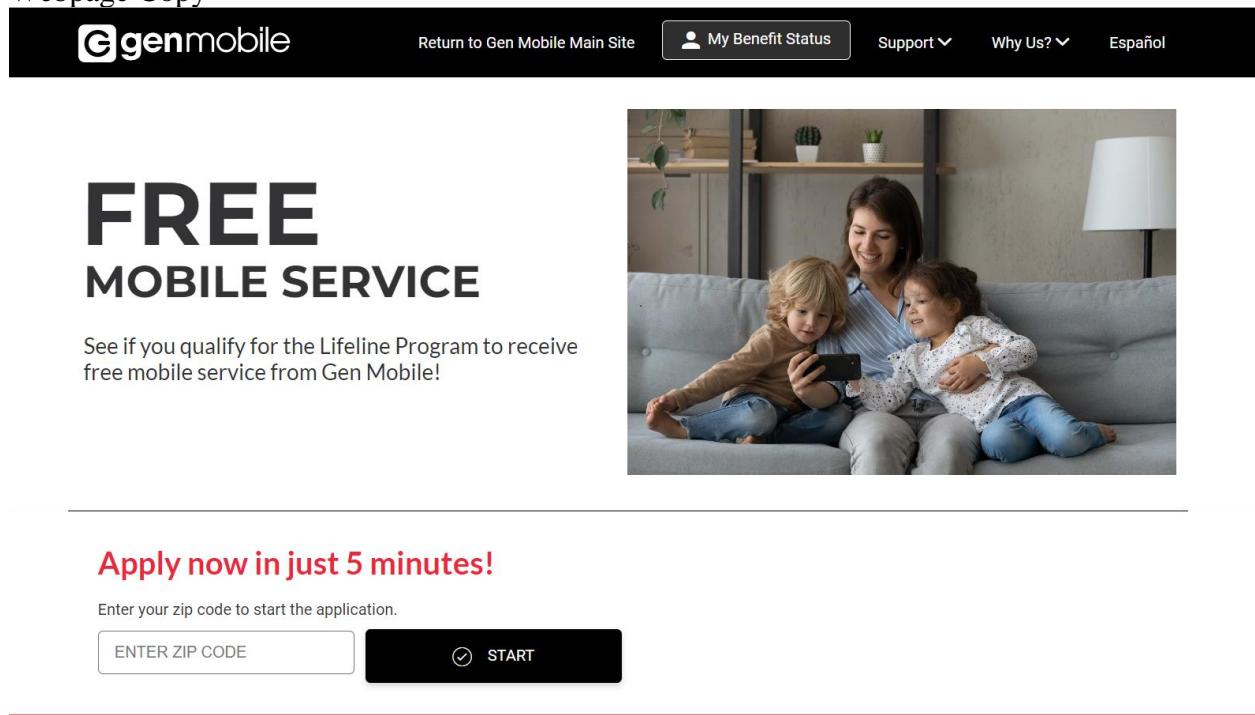
See if you qualify for the Lifeline Program with Gen Mobile!

**Apply Today**

DSB 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. Only one discounted single line(s) is permitted and is non-transferable to another person. 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 further administered by the National Service Administrative Company (NSAC) will determine whether the household meets the eligibility requirements to participate in Lifeline. Go to genmobile.com for Gen Mobile's Terms & Conditions, including the full restrictions for Lifeline, and wireless service plans.




## 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.

[START](#)

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

Form 10-K of EchoStar Corporation, which indirectly owns 100% of DISH Wireless L.L.C., <https://ir.echostar.com/static-files/c0c6367b-a6dc-455c-87c4-5d30a5127048>.

See attached Financial Capability Letter from DISH Network Corporation and Exhibit 21 from EchoStar Corporation's 2023 Form 10-K illustrating the current organizational chart of the company and its affiliates and subsidiaries.



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", is written over the word "Sincerely,".

Paul Orban  
EVP, Chief Financial Officer

Enclosures

9601 S Meridian Blvd, Englewood, CO 80112

## 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%	DDBS
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>.



**EHOSTAR CORPORATION AND SUBSIDIARIES**  
**LIST OF SUBSIDIARIES**  
As of December 31, 2023

<b>Subsidiary</b>	<b>State or Country of Incorporation</b>	<b>% of Ownership</b>	<b>Name Doing Business As</b>
DISH Network Corporation	Nevada	100%	DISH
DISH DBS Corporation	Colorado	100% (1)	DDBS
DISH Network L.L.C.	Colorado	100% (2)	DNLLC
DISH Wireless Holding L.L.C.	Colorado	100% (1)	DISH Wireless Holding
DISH Wireless L.L.C.	Colorado	100% (3)	DISH Wireless
Hughes Satellite Systems Corporation	Colorado	100%	HSSC
Hughes Communications, Inc.	Delaware	100% (4)	Hughes

- 
- (1) This is a subsidiary of DISH Network Corporation  
(2) This is a subsidiary of DISH DBS Corporation  
(3) This is a subsidiary of DISH Wireless Holding L.L.C.  
(4) This is a subsidiary of Hughes Satellite Systems Corporation

## EXHIBIT 6: KEY PERSONNEL BIOS

**Robert Yap, SVP 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 is a co-founder of Gen Mobile Inc. and served as its CFO 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, Director 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. She is a co-founder of Gen Mobile Inc. and leads the marketing department.

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

**Jose Andrade, Director 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.

**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, Director 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.