

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of  
  
TAG MOBILITY, LLC d/b/a TAG  
MOBILE  
  
Seeking Designation as an Eligible  
Telecommunications Carrier on a Wireless  
(Lifeline Only) Basis

DOCKET UT-240749  
  
ORDER 01  
  
GRANTING PETITION FOR  
DESIGNATION AS ELIGIBLE  
TELECOMMUNICATIONS CARRIER  
DESIGNATION AND EXEMPTIONS  
FROM WAC 480-123-030(1)(d), (f),  
AND (g)

**BACKGROUND**

- 1 On October 8, 2024, TAG Mobility, LLC d/b/a TAG Mobile (TAG Mobile 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. TAG Mobile seeks ETC designation in Washington for the purpose of receiving federal Low Income (Lifeline) support that subsidizes monthly charges for telecommunications services 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. TAG Mobile 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 November 25, 2024, the Company filed a letter of financial guarantee from an affiliate, HTH Communications, LLC, committing to making its financial, technical, and managerial resources available to TAG Mobile, should the need arise. On February 5, 2025, the Company filed an income statement for the 2024 calendar year and a balance sheet as of December 30, 2024. On February 13, and March 12, 2025, TAG Mobile amended its petition to include: a) the list of exchanges for which the Company requests ETC designation; and b) the Tribal Lifeline package 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 Kit or eSIM.
- Free Shipping.
- Free Wi-Fi-Calling.
- Free Calls to 911.
- Free 411 Directory Assistance.
- Caller ID, Call Waiting, 3-Way Calling, and Voicemail.
- Nationwide Coverage.
- 27/7 Customer Support.

4 The details of TAG Mobile’s proposed 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>Unlimited International Calling</b>	<b>Net Cost to Qualifying Customers</b>
Basic Lifeline	Unlimited	Unlimited	5 GB	80+ Countries including Canada and Mexico	\$0.00
Tribal Lifeline	Unlimited	Unlimited	15 GB	80+ Countries including Canada and Mexico	\$0.00

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

<b>Current Data</b>	<b>Price</b>
512 MB	\$2.99
1 GB	\$4.99
2 GB	\$9.99
3 GB	\$15.99
4 GB	\$21.99
5 GB	\$26.99

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

6 TAG Mobile has been designated as an ETC in 22 states and offers commercial mobile  
radio service by reselling the network services of AT&T. The Company currently has  
applications pending for ETC designation in eight other states and the District of  
Columbia.

7 Commission Staff (Staff) agrees with TAG Mobility that it 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 TAG Mobility'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):

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<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.

- (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 TAG Mobility 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 reselling its underlying network carrier's services. The Company commits that it will advertise the availability of Lifeline services.

14 Staff recommends that TAG Mobility should qualify for ETC designation with the proposed conditions in Appendix B. Staff reviewed the Company's technical and financial capabilities to provide the supported Lifeline service and carefully considered relevant factors suggested in 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 TAG Mobility 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." TAG Mobile 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.

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<sup>4</sup> 47 U.S.C. § 214(e)(1).

- 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.” TAG Mobile 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” TAG Mobile 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 TAG Mobility as we have done when designating other similarly situated ETCs in Washington. Appendix

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<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, 2020), 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.

B 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 TAG Mobility'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) TAG Mobility is a telecommunications company seeking to do business in the state of Washington. TAG Mobility meets the requirements for designation as an ETC because the company provides services supported by federal universal support mechanisms and because TAG Mobility has committed to advertise the availability of its services and the charges therefore using media of general distribution. TAG Mobility's designation as an ETC will advance the purpose of universal service because TAG Mobility will offer voice telephony services and broadband services, which facilitate universal service. TAG Mobility 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. TAG Mobility 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) TAG Mobility, LLC d/b/a TAG Mobile's Petition is GRANTED such that TAG Mobility, LLC d/b/a TAG Mobile shall be designated as an Eligible Telecommunications Carrier for the purpose of receiving Lifeline support from

the Federal Universal Service Fund in the service areas specified in Appendix A;  
and, subject to the conditions specified in Appendix B.

- 25 (2) TAG Mobility, LLC d/b/a TAG Mobile's request for exemptions from WAC 480-  
123-030(1)(d), (f), and (g), as described in TAG Mobility, LLC d/b/a TAG  
Mobile'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