

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

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| <p>In the Matter of the Petition of</p> <p>GO MD USA LLC</p> <p>FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER</p> | <p>DOCKET NO. _____</p> |
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PETITION OF GO MD USA, LLC FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER IN THE STATE OF WASHINGTON FOR THE
LIMITED PURPOSE OF OFFERING LIFELINE SERVICE TO QUALIFIED HOUSEHOLDS

Michael A. Campbell, Counsel
GO MD USA LLC
3385 Airways Blvd STE 201
Memphis TN, 38116
HQ: (888) 818-9220
Personal line: (253) 590-6646
mcampbell@GoMDUSA.net

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I. INTRODUCTION

GO MD USA LLC dba GO MD USA (“GO MD USA” or the “Company”), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”)¹ and Sections 54.101 through 54.207² of the Rules of the Federal Communications Commission (“FCC”),³ and the rules of the Washington Utilities and Transportation Commission (the “Commission”), including the filing requirements for Lifeline service providers,⁴ hereby submits this Petition for Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of Washington. The Company seeks ETC designation for the limited purpose of providing Lifeline service under the brand name “GO MD USA Mobile” to qualifying Washington consumers subject to the service areas served by the Company’s underlying wireless carriers, AT&T and T-Mobile.

As demonstrated herein, and as certified in Exhibit 1 to this Petition, the Company meets all the

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R. §§ 54.101-54.207.

³ GO MD USA 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”).

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 Washington Commission expeditiously approve this Petition.

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

Michael A. Campbell, Counsel
Go MD USA LLC
3385 Airways Blvd., Ste 201
Memphis, TN 38116
campbell@fastmail.net

II. COMPANY OVERVIEW

GO MD USA LLC is a South Dakota limited liability company with a principal address at 3385 Airways BLVD STE 201, Memphis, TN 38116. GO MD USA provides, among other things, resold wireless telecommunications services operating in Washington and other states, using the GO MD USA Mobile brand name and other brand names.

GO MD USA's parent company, GO MD USA LLC ("GO MD USA"), is a connectivity company headquartered in Tennessee that has served as a disruptive force in mobile telehealth technologies. In 2023, GO MD USA entered the retail wireless business by creating GO MD USA Mobile brand and in 2023, acquiring the GO MD USA Mobile brand as well as other brands and customer assets. Now, using its subcontracted licensed wireless spectrum assets, GO MD USA is building the nation's first virtualized, cloud-native, Open Mobile Telehealth Mobile Network- based 5G broadband network. To facilitate the buildout, GO MD USA will be entering

⁴ 47 C.F.R. § 54.400 et seq.

into multi-year agreements with multiple partners. Because GO MD USA is actively sub-contracting wireless facilities around the country, it is well positioned to identify opportunities to target build-outs in under-served areas.

Even as the 5G network partner relationships are expanding, GO MD USA will be competing in the retail wireless space and is in the process of seeking to be an approved provider in the Federal Communications Commission's Affordable Connectivity Program ("ACP").⁵ Under the GO MD USA Mobile name, GO MD USA will use AT&T and T-Mobile wireless facilities to provide discounted mobile broadband service in all 50 states and the territories of Washington, D.C. and Puerto Rico, including plans bundling voice, text messaging, and mobile broadband services.⁶ Available GO MD USA Mobile branded plans include talk, text, and data at various data speeds under the ACP's monthly \$30 subsidy for eligible consumers. GO MD USA will submit an application for ETC designation with the FCC (for the states of Alabama, Connecticut, Delaware, Florida, New Hampshire, North Carolina, and the District of Columbia, the "Non-Jurisdictional States"). GO MD USA seeks designation as a wireless ETC in Washington, will seek authorization by the California Public Utilities Commission to provide California LifeLine service, and has filed or plans to file for ETC status in other states.

GO MD USA now seeks an ETC designation in Washington so that it can (i) serve low-income Washington customers, (ii) supplement the amount of support available to ACP customers and (iii) invite new, underserved customers to benefit from Lifeline and other federal support

⁵ The United States Congress has yet to re-authorize the Affordable Connectivity Program, which has expired. We expect that the program will be revived and we will be ready to participate if and when it is. The purpose of mentioning it in this petition is to demonstrate our familiarity with the program, our experience with it and our willingness and ability to participate in the future.

programs. GO MD USA’s Lifeline-supported plans will be offered to prepaid customers under the GO MD USA Mobile brand, a recognized and trusted provider in this market segment. GO MD USA 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 2023 and beyond society and opportunities. GO MD USA Mobile customers can choose from several affordable prepaid calling plans and handsets and have access to high-quality, responsive customer service. GO MD USA Mobile prepaid plans start as low as \$10 per month and can be refilled by contacting GO MD USA directly.

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.⁷ Under the Act, a state public utility commission, like the Commission, with jurisdictional authority over ETC designations must designate a common carrier as an ETC if the carrier satisfies the requirements of Section 214(e)(1). Therefore, the Commission has the authority to designate GO MD USA as an ETC. As demonstrated below, GO MD USA 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, GO MD USA 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

⁶ See 47 C.F.R. § 54.1602(b) (“a bundle of broadband internet access service along with fixed or mobile voice telephony service, text messaging service, or both” is an EBB-eligible plan).

⁷ 47 U.S.C. § 214(e)(2).

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 1988.⁸ 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 quality standards; and (4) demonstrate that it is financially and technically capable of providing Lifeline service.

Finally, prior to designating a carrier as an ETC,⁹ the Commission must determine whether such designation is in the public interest.¹⁰ When making a public interest determination, the Commission needs to consider the benefits of increased consumer choice and the unique advantages and disadvantages of the applicant's service offerings.¹¹

A. GO MD USA Is a Common Carrier

⁸ 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).

⁹ 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 GO MD USA is not seeking high cost support in this Petition, it is expanding its network through partner relationships and contracts 5G network in accordance with certain FCC-approved deadlines.

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

¹¹ See, e.g., *Virgin Mobile USA, L.P., Petitions for Designation as an Eligible Telecommunications Carrier in the State of Alabama, et al.*, WC Docket No. 09-197, Order, 25 FCC Rcd 17797 (2010).

GO MD USA provides, among other things, commercial mobile radio services (CMRS) that are regulated pursuant to the common carrier requirements of the Communications Act. 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.¹²

B. GO MD USA Will Offer the Services Supported by Federal Universal Service Support Mechanisms¹³

Pursuant to Section 54.101(a) of the FCC's rules, GO MD USA's voice service provides the following:

- (1) voice grade access to the public switched network or its functional equivalent;
- (2) minutes of use for local service at no additional charge to end users;
- (3) access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and (4) toll limitation services to qualifying low- income consumers.¹⁴ As defined in Section 8.1(b) of the FCC's rules, GO MD USA also provides mobile broadband internet access service to consumers.¹⁵

C. GO MD USA Will Offer the Services Designated for Support Using a Combination of Its Partners' Facilities and Resale¹⁶

GO MD USA, through the GO MD USA Mobile brand, offers the supported services--

¹² 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).

¹³ See WAC 480-123-030 (1)(b).

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

¹⁵ See 47 C.F.R. § 8.1(b).

¹⁶ WAC 480-123-030 (1)(c).

voice telephony service and broadband Internet access service, meeting the standards set in the FCC's rules.¹⁷ GO MD USA will be 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. GO MD USA is in a unique position to increase wireless competition and serve low-income consumers. GO MD USA Mobile service plans are supported by AT&T and T-Mobile's networks. This will allow GO MD USA to immediately introduce new Lifeline options for Washington consumers as soon as the Commission approves this Petition. At the same time, GO MD USA is building additional partner relationship in advanced nationwide 5G network services. In areas of Washington where service on GO MD USA's subcontracted network is not yet available or where the Company does not yet offer Lifeline products on its partner networks, GO MD USA will provide service on a resale basis on the networks of AT&T and/or T-Mobile. Accordingly, pursuant to 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.101(b), GO MD USA will offer GO MD USA Mobile-branded services that are designated for federal universal support using a combination of its own facilities and/or resale of another carrier's services.

D. GO MD USA Will Provide GO MD USA Mobile-Branded Service Throughout Its Designated Service Area

Because GO MD USA is deploying facilities-based wireless voice and broadband services in Washington and other states, there is no need for GO MD USA to obtain an approved FCC Compliance Plan in accordance with the *2012 Lifeline Reform Order*.¹⁸

Pursuant to 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d), as an ETC, GO MD USA

¹⁷ See 47 C.F.R. § 54.101(a).

¹⁸ See *2012 Lifeline Reform Order*, ¶ 368.

will provide service in the same 50-state footprint where it plans to offer ACP service – this includes the entire geographic boundary of the State of Washington, subject to coverage limits of underlying carriers and GO MD USA’s partner networks. Further, pursuant to 47 C.F.R. § 54.202(a)(1)(i), the Company commits to provide service throughout its proposed service area on a timely basis to all customers making a reasonable request for service where facilities are available. GO MD USA requests ETC designation that is statewide in scope, within the limits of the accompanying list of zip codes Go MD USA currently is prepared to serve, 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. GO MD USA hereby petitions for a waiver of the requirement of WAC 480-123-030(1)(f) to provide a map in .shp format on the ground that the accompanying zip code list adequately identifies the proposed coverage area, and as a reseller for AT&T and T-Mobile with current cellular towers of its own, GOMDUSA can only serve those areas that are already covered and identified by those carriers.

E. The Company Will Advertise the Availability of GO MD USA 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 GO MD USA 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.¹⁹ In addition, the availability of GO MD USA 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 Commission rules. Samples of

the Company's Lifeline advertising are attached hereto as Exhibit 4.

F. GO MD USA Will Comply with Service Requirements Applicable to the Support It Receives

Pursuant to 47 C.F.R. § 54.202(a)(1)(i), GO MD USA will comply with the service requirements applicable to the supported services it will be offering in the identified service areas. GO MD USA Mobile plans will be offered in Washington initially by reselling AT&T and/or T-Mobile service, and in the future will also be supported by GO MD USA's own 5G network facilities when feasible. These providers' 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 very soon after receiving approval from the Commission.

G. GO MD USA 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. GO MD USA is in a unique position, however, because it is working on building its own facilities-based 5G wireless network through partnerships we are in the process of deploying 5G broadband service to 40% of the U.S. population on September 1, 2023 and scheduled to deploy 70% of the U.S. population by December 15, 2023 and (using certain low-band spectrum) to 85% of the population of each Partial Economic Area by July 1, 2024. GO MD USA 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

¹⁹ WAC 480-123-030 (1)(e).

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. GO MD USA commits to fully complying with the CTIA Consumer Code.²⁰

I. Ability to Remain Functional During Emergencies

The Company's services are able to remain functional in emergency situations as required by 47 C.F.R. Section 54.202(a)(2) and WAC 480-123-030(g). GO MD USA's partner 5G network operates in a cloud-native environment that is not encumbered by traditional technology and will be more flexible and resilient in the event of service outages. In addition, GO MD USA relies on mobile virtual network operator (MVNO) partner networks that are designed to remain functional even without external power sources, are able to re-route traffic around damaged facilities, and can manage traffic spikes that may occur in emergency situations.

GO MD USA LLC adopts a cloud-native 5G network setup, distinguishing itself from legacy systems by leveraging cloud infrastructure instead of dedicated single servers. This shift enables virtualization, allowing server resources to expand in real-time and eliminating the vulnerability of a single point of failure. By distributing core software across multiple resources rather than being confined to a single server, GO MD USA LLC ensures enhanced scalability and reliability in telecommunications. This approach optimizes resource usage and supports seamless scaling to meet varying demands, ensuring robust and uninterrupted 5G service

²⁰ WAC 480-123-030(1)(h).

delivery across diverse operational requirements.

To the extent that GO MD USA, as a reseller of services for AT&T and T-Mobile, is dependent upon those networks capabilities to deal with power outages, GO MD USA requests a waiver from the Washington Utilities and Transportation Commission from its backup power requirements.²¹

J. GO MD USA 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.²² GO MD USA satisfies these criteria.

GO MD USA is financially stable and capable of honoring its service obligations to customers, as shown in Exhibit 5, 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 position the Company to expand its operations to serve currently unserved/underserved eligible low-income Washington consumers 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.

As a reseller of services for AT&T and T-Mobile and a provider of Lifeline services only, GO MD USA requests a waiver of the investment requirements of WAC 480-123-030(1)(d).

²¹ WAC 480-123-030(1)(g).

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. GO MD USA 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 GO MD USA provides devices for use with Lifeline-supported broadband service, such devices will meet the equipment requirements set forth in 47 C.F.R. § 54.408(f), and GO MD USA will not impose an additional or separate tethering charge for mobile data usage below the minimum standard.

Attached hereto as Exhibit 2 is a summary table of the Company's proposed Lifeline service offerings, showing that Lifeline customers can receive 1,000 voice minutes, 1,000 text messages, and 4.5 gigabytes (GB) of data per month at a net cost of \$0.00 after application of Lifeline support. Customers will also be able to purchase additional minutes or data as needed.

In addition to wholly-supported or discounted wireless services, prepaid Lifeline customers will be able to receive an upgraded handset at an additional charge or SIM card offer, as well as access to voice mail, caller I.D., call forwarding, 3-way calling, and call waiting features at no additional charge. Customers may use their minutes to place domestic long-distance calls at no additional charge, and calls to the Company's customer service are free with no deduction of available minutes. Calls to 911 emergency services are always free, regardless of service

²² See 2012 Lifeline Reform Order, ¶ 387; see also 47 C.F.R. § 54.202(a)(4).

activation or availability of minutes.

L. GO MD USA 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. GO MD USA 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 rules requires ETCs to certify and verify a Lifeline customer's initial and continued eligibility. GO MD USA 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 and ACP services. GO MD USA will require all GO MD USA Mobile's Lifeline applicants to complete the standard Lifeline and ACP application forms in the National Verifier environment. The standard Lifeline and ACP application complies with the disclosure, certification, and information collection requirements in 47 C.F.R. § 54.410(d).²³ For applicants verified as being eligible by USAC's National Verifier and NLAD, GO MD USA will complete enrollment by transmitting the required information into NLAD as required by Section 54.404(b)(6) of the FCC's rules. In addition, at the time of enrollment, the Company will notify the applicant that the prepaid service must be personally activated by the subscriber and the subscriber must use their service every thirty (30) days in order to maintain their Lifeline benefit

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

and ACP benefits.

GO MD USA 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.

M. Prevention of Waste, Fraud and Abuse²⁴

The Company recognizes the importance of safeguarding the Universal Service Fund ("USF") and has implemented measures and procedures to prevent duplicate Lifeline and ACP benefits being awarded to the same household. GO MD USA 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 or ACP Service from GO MD USA or any other ETC, and whether anyone else living at the prospective subscriber's residential address is currently receiving Lifeline service or ACP services.

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 or ACP services 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

²⁴ 47 C.F.R. §§ 54.405(e), 54.410(f).

47 C.F.R. § 54.405(e)(3), GO MD USA will provide the subscriber advance notice when a subscriber's failure to use the Lifeline service or ACP services 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 or ACP services in the future by reapplying and re-establishing eligibility.

To further protect the integrity of the USF, GO MD USA contracts with third party vendors to backstop USAC's own processes and procedures. First, the Company will use telgoo5.com software to process Lifeline applications and ACP applications. Among other things, Emerios uses third-party verification sources (currently the LexisNexis LEXID service) to validate a prospective customer's identity. Emerios also validates the Company's subsidy data to prevent duplicate subsidies. In addition, the Company has established a back-office real time review ("RTR") process to be completed before a Lifeline application is passed to the National Verifier to qualify a customer. This process involves specially trained operations analysts (who have no financial stake in whether an application is successful) individually confirming the information entered into the application and supporting documentation to, among other things, confirm the identities of the sales agent and the customer by reviewing pictures of them in real time during the application process and review the customer's identification and address for anomalies. GO MD USA has hired experienced staff and a third-party company to provide RTR for our Lifeline enrollments. This third-party company has substantial experience running RTR for other Lifeline providers.

N. Commission's Lifeline Requirements

GO MD USA will comply with the Commission's rules and orders that are applicable to wireless ETCs. Specifically, GO MD USA will meet the reporting requirements and consumer

safeguards set forth in the Commission Lifeline Requirements. As such, within 30 days of designation as an ETC and prior to offering Lifeline service in Washington, GO MD USA will submit the following information to the UTC: (1) Lifeline application form; (2) advertising and marketing materials that GO MD USA plans to use in Washington; (3) rates, terms, and conditions of its Lifeline service offerings in Washington; (4) contact information for the Company's customer service designee; and (5) the Company's proposed method and timing of annual recertifications and a sample recertification notice.²⁵ GO MD USA will comply with the Commission Lifeline Requirements regarding consumer safeguards, including working with the Commission staff to resolve Lifeline subscriber disputes, providing 60 days' notice to subscribers and the Commission of a planned discontinuance of Lifeline service, and working with the Commission to facilitate a smooth transition of subscribers to an alternative ETC in the event of a discontinuance of service. The Commission Lifeline Requirements direct wireless ETCs to include the Commission's Consumer Division contact information on the ETC's website, marketing materials, applications, and terms and conditions and to advise that the Consumer Division is available to handle Lifeline complaints on the ETC's website and in the terms and conditions. GO MD USA will comply with these requirements to the extent that they are in effect and not waived by the Commission.

GO MD USA also will submit the reports identified in the Commission Lifeline Requirements that are due annually by January 31 (FCC Form 555, report on marketing and promotional activities, public safety answering point self-certification, and certification that all 911 fees have been paid) and by July 1 (FCC Form 481, Lifeline terms and conditions, and

²⁵ The annual recertification process is administered by the National Verifier. GO MD USA will advise customers that they may need to recertify their eligibility annually if the National Verifier does not automatically do so, in accordance with 47 C.F.R. § 54.410(f).

complaints per 1,000 subscribers). The Company will submit 30-day notices of the events specified in the Commission Lifeline Requirements, will provide copies of final USAC audit reports, and provide 5-business day prior notice of material changes to rates, terms of conditions of Lifeline service.

O. Waivers requested herein

In this petition, GO MD USA has requested waivers for the following requirements of the Washington Administrative Code:

WAC 480-123-030(1)(d) regarding investments (this Petition, section IV.I).

WAC 489-123-030(1)(f) requiring map of coverage areas (this Petition, Exhibit 3).

WAC 480-123-030(1)(g) concerning backup capabilities (this Petition, section IV.J).

V. DESIGNATING GO MD USA 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 GO MD USA Mobile-branded Lifeline services. Americans increasingly need greater access to voice and broadband services, and low-income Washington consumers in particular, are suffering from the lack of affordable and available access. The Company is currently helping to close the gap by seeking approval to providing service under the ACP and stands ready to expand consumer choice and continue offering discounted services as a Lifeline ETC to customers who have come to rely on these benefits. In addition, because GO MD USA is planning to deploy a new facilities-based wireless 5G network throughout the country over the next several years, designating GO MD USA 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 GO MD USA Mobile Lifeline Plans and ACP Plans

Authorizing the Company as a Lifeline ETC in the State of Washington will enable the Company to provide eligible low-income consumers 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 can always 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.

GO MD USA Mobile Lifeline service plans provide meaningful options for low-income consumers because they offer low-cost, reliable alternatives to traditional rate plans. Among the GO MD USA 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 GO MD USA Mobile plans.

In addition, GO MD USA Mobile Lifeline plans alleviate customer concerns regarding deposits, hidden costs, varying monthly charges, and long-term contract issues. GO MD USA 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."²⁶ 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."²⁷ 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 GO MD USA 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 GO MD USA will promote competition for the benefit of consumers and will have desirable effects upon the Washington market for Lifeline services by making these services more available and accessible, thereby supporting the goals of universal service.

VI. ANTI-DRUG ABUSE CERTIFICATION

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

²⁶ *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).

²⁷ *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).

VII. CONCLUSION

Based on the foregoing, designation of GO MD USA 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, GO MD USA respectfully requests that the Commission designate GO MD USA as an ETC in the State of Washington for the purpose of participating in the Lifeline program.

Respectfully submitted,

Mark Schirmer, General Counsel, (901) 230-4697
Michael A. Campbell, Counsel. (253) 229-8359
Go MD USA LLC

EXHIBIT 1: VERIFICATION

I, Apollo Arcallana, Manager of GO MD USA Mobile for GO MD USA LLC, have reviewed and am familiar with the foregoing Petition for Designation as an Eligible Telecommunications Carrier in the State of Washington. I declare under penalty of perjury under the law of Washington that the foregoing is true and correct.

Signed on the 12th day of July, 2024 at Memphis, Tennessee.

Apollo Arcallana

Apollo Arcallana, President

GO MD USA LLC

EXHIBIT 2: PROPOSED LIFELINE PLANS

| <u>Subsidy Amount</u> <u>(\$)</u> | <u>Subsidy Type</u> | <u>GO MD USA 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 EXCHANGE
AREAS**

In lieu of providing a map that shows the company's coverage areas, GO MD USA respectfully requests a waiver of the requirement to file an exchange map and permission for the company to provide a list of exchanges to be covered, in consultation with Washington UTC staff.

EXHIBIT 4: SAMPLE ADVERTISEMENT

Are you or your family eligible for the

AFFORDABLE CONNECTIVITY PROGRAM?

This federal program helps ensure that households can afford the broadband they need for work, school, healthcare, and more!



GET UP TO...

\$100 ←
discount on a laptop,
computer, or tablet

\$30 ←
per month toward
your internet bill

To check your
eligibility or apply, visit 

WWW.FCC.GOV/ACP

AD

Sample

EXHIBIT 5: FINANCIAL STATEMENT

GO MD USA LLC has obtained funding commitments from various partners and believes that it will have sufficient funding to support its business plans.

Moreover, the company is not reliant on ACP or Life Line revenue, as these sources of income only pertain to a small segment of GO MD USA's operations.