

**BEFORE THE STATE OF TENNESSEE
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

GO MD USA LLC)	
Petition for Designation as an Eligible)	
Telecommunications Carrier in THE STATE)	
OF TENNESSEE for the Limited Purpose of)	Docket No. <u>23-00022</u>
Providing Lifeline Service to Qualifying)	
Customers)	
)	

**PETITION OF GO MD USA LLC FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER IN THE STATE OF TENNESSEE FOR
THE LIMITED PURPOSE OF OFFERING LIFELINE SERVICE TO
QUALIFIED HOUSEHOLDS**

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March 18, 2023

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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 TENNESSEE Department of Telecommunications and Cable (the “Department”), 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 TENNESSEE. The Company seeks ETC designation for the limited purpose of providing Lifeline service under the brand

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*”).

name “GO MD USA Mobile” to qualifying TENNESSEE 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 federal and Commonwealth statutory and regulatory requirements for designation as an ETC in TENNESSEE. 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 TENNESSEE residents as soon as possible. Accordingly, the Company respectfully requests that the TENNESSEE Department expeditiously approve this Petition.

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

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II. COMPANY OVERVIEW

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 LLC provides, among other things, resold wireless telecommunications services operating in TENNESSEE and other states, using the GO MD USA Mobile brand name and other brand names.

GO MD USA’ 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 into multi-year agreements with multiple partners. Because GO MD USA is actively subcontracting 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").

Under the GO MD USA Mobile, 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.⁵ 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 be submitting an application for ETC designation pending 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 will be seeking designation as a wireless ETC in TENNESSEE and other 46 states, and will seek authorization by the California Public Utilities Commission to provide California LifeLine service, and plans to file for ETC status in other states over time.

GO MD USA now seeks an ETC designation in TENNESSEE so that it can (i) serve low-income TENNESSEE customers, (ii) supplement the amount of support available to

⁵ 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).

ACP customers and (iii) invite new, underserved customers to benefit from Lifeline and other federal support programs. GO MD USA' 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.⁶ Under the Act, a state public utility commission, like the Commission, with jurisdictional authority over ETC designations must designate a common carrier as an ETC if the carrier satisfies the requirements of Section 214(e)(1). Therefore, the Commission has the authority to designate GO MD USA as an ETC. As demonstrated below, GO MD USA fulfills the requirements to be designated as an ETC in TENNESSEE.

IV. THE COMPANY MEETS THE REQUIREMENTS FOR ETC DESIGNATION

A application for ETC designation in TENNESSEE 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

⁶ 47 U.S.C. § 214(e)(2).

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 1988.⁷In 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.

⁸Finally, prior to designating a carrier as an ETC, the Commission must determine whether such designation is in the public interest.

⁹ When making a public interest determination,

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

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

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

- A. the Commission considers the benefits of increased consumer choice and the unique advantages and disadvantages of the applicant's service offerings.¹⁰**GO MD USA Is a Common Carrier**

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.

¹¹ Accordingly, the Company meets the common carrier requirement for ETC designation pursuant to Section 214(e)(1) of the Act and Section 54.201(d) of the FCC's rules.

- B. **GO MD USA Will Offer the Services Supported by Federal Universal Service**

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.¹² As defined in Section 8.1(b) of the FCC's rules, GO MD USA also provides mobile broadband internet access service to consumers.¹³

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

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

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

¹³ See 47 C.F.R. § 8.1(b).

C. GO MD USA Will Offer the Services Designated for Support Using a Combination of Its partners Facilities and Resale

GO MD USA, through the GO MD USA Mobile brand, offers the supported services - voice telephony service and broadband Internet access service - meeting the standards set in the FCC's rules.¹⁴ 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 TENNESSEE 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 will be supported by AT&T and T-Mobile's networks. This will allow GO MD USA to immediately introduce new Lifeline options for TENNESSEE consumers as soon as the Department approves this Petition. At the same time, GO MD USA is building additional partner relationship in advanced nationwide 5G network serves. The Company will be launching 5G broadband service in over 80 cities (including in TENNESSEE) ⁵ In areas of TENNESSEE where service on GO MD USA' 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.

¹⁴ See 47 C.F.R. § 54.101(a).

Because GO MD USA is deploying facilities-based wireless

- D. voice and broadband services in TENNESSEE 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*.¹⁶**GO MD USA Will Provide GO MD USA Mobile-Branded Service Throughout Its Designated Service Area**

Pursuant to 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d), as an ETC, GO MD USA 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 TENNESSEE 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 to allow the Company to provide Lifeline service wherever its underlying, facilities-based providers have wireless coverage. The current TENNESSEE coverage footprint by zip code is attached hereto as Exhibit 3.

- 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. In addition, the availability of GO MD USA.

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

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 Department 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 TENNESSEE 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 Department.

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 its 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

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.

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). 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.

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.¹⁷ 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.

¹⁷ See *2012 Lifeline Reform Order*, ¶ 387; see also 47 C.F.R. § 54.202(a)(4).

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 TENNESSEE 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.

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 TENNESSEE. 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 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's 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).¹⁸For 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 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. ¹⁹Prevention of Waste, Fraud and Abuse

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

¹⁸ *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>).¹⁹ 47 C.F.R. §§ 54.405(e), 54.410(f).

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 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 . (telgoo5.com) software to process Lifeline applications and ACP applications. Among other things, Emerios uses third-party verification sources (currently the Lexis Nexis LEXID service) to validate a prospective customer's identity. Emerios also validates the Company's subsidy data to prevent duplicate subsidies. In addition, the Company has established a back- office real time review ("RTR") process to be completed before a Lifeline application is passed to the National Verifier to qualify a customer. This process involves specially trained operations analysts (who have no financial stake in whether an application is successful) individually confirming the information entered into the application and supporting

documentation to, among other things, confirm the identities of the sales agent and the customer by reviewing pictures of them in real time during the application process and review the customer's identification and address for anomalies. 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. Department Lifeline Requirements

GO MD USA represents that it will comply with the Department'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 Department Lifeline Requirements. As such, within 60 days of designation as an ETC and prior to offering Lifeline service in TENNESSEE, GO MD USA will submit the following information to the Department: (1) Lifeline application form; (2) advertising and marketing materials that GO MD USA plans to use in TENNESSEE; (3) rates, terms, and conditions of its Lifeline service offerings in TENNESSEE; (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.²⁰ GO MD USA will comply with the Department Lifeline Requirements regarding consumer safeguards, including working with the Department staff to resolve Lifeline subscriber disputes, providing 60 days' notice to subscribers and the Department of a planned discontinuance of Lifeline service, and working with the Department to facilitate a smooth transition of subscribers to an alternative ETC in the event of a discontinuance of service. The Department Lifeline Requirements direct wireless ETCs to include the Department's Consumer

²⁰ 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).

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 Department.

²¹GO MD USA also will submit the reports identified in the Department Lifeline Requirements that are due annually by March 1 (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 complaints per 1,000 subscribers). The Company will submit 30-day notices of the events specified in the Department 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.

V. DESIGNATING GO MD USA AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST

The Department 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 TENNESSEE 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 deploying a new facilities-based wireless 5G network throughout the country over the next several years, designating GO MD USA as an

National Verifier).

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 TENNESSEE 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 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.

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 TENNESSEE 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 TENNESSEE 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."²² 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."²³ 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 TENNESSEE 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 TENNESSEE 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.

²² *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).

²³ *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 TENNESSEE 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 Department designate GO MD USA as an ETC in THE STATE OF TENNESSEE for the purpose of participating in the Lifeline program.

Respectfully submitted,

Apollo Arcallan
GO MD USA LLC
Manager

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 TENNESSEE. The statements in the foregoing document are true of my own knowledge, except as to matters which are herein stated on information and belief, and as to those matters, I believe them to be true.

GO MD USA Mobile & GO MD USA LLC

Apollo Arcallana

Apollo Arcallana

Manager

03/19/2023

EXHIBIT 2: PROPOSED LIFELINE PLANS

<u>Subsidy Amount (\$)</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: TENNESSEE COVERAGE AREA ZIP
CODES**

	Zip Code	Population
1	37013	102,184
2	37042	82,706
3	37211	75,073
4	37075	70,819
5	37128	69,285
6	38401	64,681
7	37122	62,696
8	37064	60,932
9	37027	60,610
10	37167	60,408
11	37129	59,266
12	37130	59,046
13	37040	58,490
14	37066	57,618
15	38017	55,161
16	37421	53,653
17	38305	51,864
18	37043	51,607
19	37087	50,976
20	37174	46,204
21	37918	46,160
22	38016	45,170
23	38128	45,087
24	38109	44,899
25	38134	43,991
26	38002	43,098
27	38125	42,717
28	37221	42,232
29	37920	41,826
30	37343	41,540
31	37115	41,274
32	38111	40,947
33	38116	40,854
34	38127	40,820

35	37207	40,697
36	38501	40,513
37	37363	39,400
38	37922	39,158
39	38118	38,931
40	38018	38,789
41	37660	38,778
42	37076	38,557
43	37620	38,335
44	38115	37,626
45	37209	37,363
46	37604	37,150
47	37601	36,707
48	37086	36,668
49	37312	36,102
50	37160	35,264
51	38301	34,420
52	37814	34,138
53	37643	33,713
54	37110	32,956
55	37803	32,701
56	37067	32,417
57	37876	32,305
58	37072	32,097
59	37923	31,893
60	37830	31,633
61	37214	31,341
62	37172	31,161
63	37323	31,127
64	37217	31,096
65	38135	30,438
66	37311	30,148
67	37919	29,796
68	37931	29,749
69	37849	28,971
70	38506	28,803
71	37206	28,694
72	37664	28,543
73	37355	28,492

74	37921	28,397
75	37055	28,369
76	37659	28,109
77	37801	27,724
78	37379	27,698
79	37934	27,423
80	37804	26,934
81	38117	26,584
82	37716	26,441
83	37388	26,426
84	38024	26,306
85	38053	26,135
86	37917	25,671
87	38138	25,459
88	37205	25,437
89	38583	24,927
90	37743	24,890
91	37148	24,880
92	37865	24,701
93	37303	24,621
94	37138	24,267
95	37334	24,144
96	38119	24,027
97	38106	23,745
98	38464	23,422
99	38141	23,299
100	37091	23,107
101	37862	23,016
102	38122	22,961
103	38104	22,900
104	37215	22,829
105	37415	22,706
106	38114	22,580
107	37615	21,992
108	37412	21,937
109	37912	21,729
110	37821	21,710
111	38133	21,702
112	37135	21,171

113	42223	21,028
114	38555	20,970
115	37212	20,917
116	37321	20,498
117	37914	20,482
118	37069	20,396
119	37857	20,383
120	37127	20,242
121	38242	20,177
122	37932	19,661
123	37208	19,546
124	37745	19,305
125	37216	19,227
126	37015	18,979
127	37774	18,914
128	37405	18,788
129	37411	18,379
130	37203	18,100
131	37725	18,055
132	38351	17,959
133	38478	17,954
134	37771	17,837
135	37766	17,534
136	37813	17,458
137	37354	17,363
138	38372	17,347
139	38108	17,300
140	37204	17,047
141	37938	17,021
142	37210	16,593
143	38112	16,437
144	37188	16,351
145	37748	16,300
145	37377	16,300
147	38139	16,265
148	37909	16,192
148	37179	16,192
150	38261	16,190
151	37763	16,165

152 38063 16,096
153 37090 15,857
154 38343 15,739
155 37398 15,530
156 37874 15,490
157 38019 15,408
158 37083 15,289
159 38237 15,091
160 38107 15,071
161 37218 15,056
162 37642 14,873
163 37416 14,742
164 38120 14,724
165 37617 14,615
166 37073 14,253
167 38103 14,243
168 37721 14,163
169 38571 14,131
170 37166 14,108
171 37916 13,967
172 37663 13,958
173 37683 13,943
174 37760 13,839
175 37924 13,354
176 37772 13,287
177 37406 13,243
178 38012 13,185
179 37404 13,152
180 37341 13,116
181 37777 13,113
182 37618 13,073
183 37650 12,937
184 37062 12,848
185 38358 12,364
186 37854 12,290
187 37367 11,868
188 37327 11,834
189 38340 11,756
190 38572 11,684

191 37879 11,509
192 38068 11,407
193 37807 11,338
194 38004 11,282
195 38556 11,172
196 38060 10,752
197 37186 10,718
198 38320 10,661
199 37074 10,568
200 38058 10,537
201 37840 10,457
202 38201 10,306
203 38462 10,230
204 37407 10,169
205 38570 10,062
206 37764 10,051
207 37397 9,895
208 37757 9,880
209 37381 9,856
210 37641 9,710
211 38011 9,666
212 37841 9,601
213 37871 9,101
214 38558 9,014
215 37877 8,922
216 37825 8,850
217 37185 8,846
218 38574 8,805
219 37037 8,798
220 38344 8,738
221 37190 8,702
222 37686 8,667
223 37385 8,599
224 38382 8,548
225 38008 8,427
226 37701 8,393
227 37322 8,359
228 37347 8,235
229 38474 8,203

230	37861	8,196
231	37033	8,090
232	38355	7,954
233	38375	7,927
234	38059	7,910
235	37030	7,821
236	38028	7,782
237	37187	7,746
238	37890	7,708
239	37058	7,620
240	37146	7,554
241	38544	7,552
242	37034	7,549
243	37403	7,452
244	38075	7,376
245	37887	7,224
246	37820	7,213
247	37080	7,101
248	37029	7,018
249	37184	6,943
250	37331	6,901
251	37722	6,864
252	38562	6,758
253	37330	6,729
254	37048	6,727
255	37101	6,714
256	37863	6,516
257	37022	6,499
258	37708	6,497
259	37220	6,481
260	37098	6,404
261	38310	6,359
262	38485	6,354
263	37036	6,338
264	37742	6,289
265	37380	6,266
266	37737	6,240
267	37329	6,207
268	37419	6,152

269 38483 6,077
270 37681 6,071
271 37752 6,049
272 37096 5,963
273 37885 5,958
274 37046 5,935
275 37082 5,705
276 38126 5,660
277 37357 5,619
278 38023 5,618
279 37769 5,561
280 38468 5,560
281 38363 5,556
282 37370 5,551
283 37645 5,460
284 38105 5,437
285 38225 5,428
286 37010 5,425
287 37818 5,378
288 37153 5,349
289 37061 5,340
290 37711 5,300
291 38006 5,259
292 37032 5,236
293 37020 5,228
294 37336 5,220
295 37915 5,200
296 37690 5,173
297 37085 5,165
298 37324 5,153
299 37705 5,099
300 37025 5,089
301 37692 5,077
302 37302 5,070
303 37307 5,065
304 37353 5,034
305 37738 5,002
306 37665 4,990
307 37616 4,860

308 38079 4,859
309 38456 4,815
310 38585 4,810
311 38040 4,762
312 38041 4,718
313 37886 4,678
314 37150 4,572
315 37869 4,557
316 37687 4,528
317 37189 4,412
318 37826 4,394
319 38001 4,384
320 37714 4,326
321 38469 4,298
322 37180 4,295
323 37402 4,293
324 37873 4,285
325 38257 4,273
326 37843 4,265
327 37191 4,255
328 37811 4,203
329 37870 4,175
330 37846 4,154
331 37031 4,137
332 38549 4,115
333 38551 4,109
334 38049 4,091
335 38330 4,064
336 38315 4,036
337 37860 3,964
338 37342 3,955
339 37709 3,943
340 37880 3,927
341 37387 3,914
342 37049 3,895
343 37658 3,894
344 38230 3,885
345 37051 3,879
346 38451 3,866

347 37143 3,864
348 38052 3,855
349 37375 3,853
350 38260 3,838
351 38313 3,714
352 38425 3,668
353 38581 3,616
354 37891 3,597
355 37035 3,551
356 37754 3,546
357 37779 3,505
358 37362 3,447
359 37888 3,428
360 38477 3,427
361 37656 3,420
362 37144 3,403
363 37409 3,399
364 38057 3,392
365 37853 3,347
366 37410 3,346
367 37310 3,338
368 38034 3,297
369 37640 3,281
370 38329 3,229
371 38357 3,220
372 37373 3,168
373 37806 3,156
374 37352 3,155
375 37134 3,151
376 38251 3,149
377 37183 3,146
378 38356 3,129
379 38472 3,116
380 37756 3,102
381 38256 3,101
382 37852 3,084
383 38221 2,982
384 37014 2,954
385 37338 2,941

386 38066 2,925
387 37755 2,913
388 38449 2,901
388 37079 2,901
390 37847 2,893
391 38316 2,874
392 37882 2,848
393 38069 2,841
394 37356 2,814
395 37770 2,801
396 38229 2,766
397 38326 2,744
398 38367 2,741
399 37317 2,729
400 38553 2,723
401 37060 2,683
402 37145 2,672
403 37614 2,666
404 37132 2,662
405 38233 2,642
406 37335 2,617
407 38450 2,613
408 38321 2,611
409 38080 2,600
410 37345 2,583
411 37762 2,581
412 38317 2,560
413 38255 2,550
414 37095 2,535
415 37018 2,487
416 38563 2,470
417 37724 2,465
418 37137 2,449
419 37308 2,431
420 37026 2,424
421 38463 2,406
422 37902 2,371
423 37047 2,275
424 38015 2,248

425 37332 2,241
426 37727 2,234
426 38341 2,234
428 37306 2,227
429 38222 2,213
430 38366 2,201
430 37309 2,201
432 38488 2,197
433 37809 2,179
434 37408 2,121
435 38240 2,104
436 37149 2,103
437 38573 2,096
438 38232 2,090
439 37012 2,082
440 37694 2,075
441 37350 2,070
442 37892 2,067
443 37142 2,030
444 37178 1,986
445 38374 1,982
446 37872 1,978
447 37360 1,923
448 37810 1,906
449 37726 1,901
450 37829 1,899
451 38388 1,881
452 37881 1,871
453 37097 1,870
454 38368 1,863
455 37318 1,836
456 37365 1,835
457 38547 1,834
458 38582 1,820
459 37050 1,812
460 37374 1,781
461 38334 1,774
462 38381 1,769
463 38345 1,768

464 37315 1,761
465 37391 1,756
466 38231 1,715
467 37140 1,713
468 37361 1,708
468 38379 1,708
470 38220 1,703
471 37325 1,693
472 37052 1,688
473 37339 1,682
474 37181 1,679
475 37729 1,675
476 38568 1,669
477 38039 1,658
478 38580 1,652
479 37228 1,650
480 38369 1,640
481 37866 1,632
482 38541 1,592
483 38482 1,582
484 38577 1,548
485 38067 1,508
486 38460 1,503
487 37828 1,489
488 37059 1,487
489 38258 1,485
490 37201 1,477
491 38560 1,467
492 38579 1,466
493 38559 1,425
494 37219 1,411
495 37713 1,410
496 37023 1,384
497 37171 1,353
498 38361 1,351
499 38342 1,325
500 38476 1,297
501 38587 1,286
502 37328 1,285

503	38461	1,284
504	37141	1,256
505	38061	1,240
506	38390	1,238
507	37313	1,222
508	38545	1,220
509	38037	1,203
510	38332	1,201
511	38452	1,187
512	38337	1,179
513	38486	1,165
514	37723	1,154
515	38548	1,153
516	37710	1,128
517	38391	1,107
518	38588	1,093
519	37359	1,090
520	37118	1,078
521	38362	1,069
522	38473	1,068
523	38505	1,061
524	37753	1,047
525	37305	1,037
526	38253	1,027
527	38241	1,022
528	38565	1,004
528	38575	1,004

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/IACP

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.