

GO MD USA LLC

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24-00046

July 17, 2024

VIA ELECTRONIC DELIVERY

To: Tory Lawless
Docket Manager
Tennessee Public Utility Commission
502 Deaderick Street 4th Floor
Nashville, TN 37243

Electronically Filed in TPUC Docket
Room on July 22, 2024 at 11:36 a.m.

Re: Go MD USA, LLC
Petition for Limited Designation as an Eligible Telecommunications Carrier

Dear Ms., Lawless:

Attached please find for filing Go MD USA LLC Petition for Limited Designation as an Eligible Telecommunications Carrier to Provide Lifeline Services to Tennessee consumers. Additionally, an original and two (2) copies are being sent via FedEx to the Docket Room along with a check in the amount of \$25.00 payable to the "Tennessee Public Utility Commission."

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me at (901) 230-4697 or VP Jack Sosa at (833) 706-3872.

Thank you.

Sincerely,

Mark J. Schirmer, #019717
General Counsel
Go MD USA

Attachment

cc: Matt Palacios, CEO
Go MD USA LLC

**BEFORE THE TENNESSEE PUBLIC UTILITY
COMMISSION**

In the Matter of the Petition of GO MD USA LLC for Designation as an Eligible Telecommunications Carrier in the State of Tennessee for the Limited Purpose of Providing Lifeline Service to Qualifying Customers	DOCKET NO. <u>24-00046</u>
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**PETITION FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER IN
THE STATE OF TENNESSEE FOR THE LIMITED PURPOSE OF PROVIDING LIFELINE
SERVICE TO QUALIFYING CUSTOMERS**

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BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

In the Matter of the Petition of GO MD USA LLC FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER	DOCKET NO. <u>24-00046</u>
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I. INTRODUCTION AND OVERVIEW

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 Public Utility Commission (the “Commission”), 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 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 noted GO MD USA seeks ETC designation solely to provide Lifeline service to qualifying Tennessee consumers; it will not (and is not eligible to) seek access to funds from the federal Universal Service Fund (“USF”) for the purpose of participating in the Link-Up program

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R. §§ 54.101-54.207.

³ GO MD USA files this Application 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”)

or high-cost program.⁴

As demonstrated herein, and as certified in Exhibit 1 to this Petition, the Company meets all the federal and state statutory and regulatory requirements for designation as an ETC in Tennessee, including the requirements outlined in the FCC’s Lifeline and Link Up Reform Order,⁵ Lifeline Modernization Order,⁶ and Fifth Report and Order.⁷ 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. GO MD USA is positioned to reach unserved and underserved Lifeline-eligible consumers. Rapid grant of GO MD USA’s request, therefore, would advance the public interest because it would enable the Company to commence much needed Lifeline services to a wide array of low-income Tennessee residents as soon as possible. Accordingly, the Company respectfully requests that the Commission expeditiously approve this Petition.

⁴ Given that the Company only seeks Lifeline support from the low-income program and does not seek any high-cost support, ETC certification requirements for the high-cost program are not applicable to the Company.

⁵ In the Matter of 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 No. 11-42, WC Docket No. 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) (“Lifeline and Link Up Reform Order”).

⁶ In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund, WC Docket No. 11-42, WC Docket No. 09-197, WC Docket No. 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) (hereinafter, “Third Report and Order” or “Lifeline Modernization Order”).

⁷ In the Matter of Bridging the Digital Divide for Low-Income Consumers, Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, WC Docket No. 17-287, WC Docket No. 11-42, WC Docket No. 09-197, Fifth Report and Order, Memorandum Opinion and Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking, FCC 19-111 (rel. Nov. 14, 2019) (hereinafter, “Fifth Report and Order”).

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 38116.⁸ GO MD USA 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'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 in part by 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 sub-contracting wireless facilities around the country, it is well positioned to identify opportunities to target build-outs in under-served areas.

⁸ GO MD USA was organized and registered as and LLC on December 22, 2022.

Even as the 5G network partner relationships are expanding, GO MD USA has been competing in the retail wireless space and has been an approved provider in the Federal Communications Commission’s Affordable Connectivity Program (“ACP”) throughout the U.S., including Tennessee.⁹ Under the GO MD USA Mobile name, GO MD USA uses AT&T and T-Mobile wireless facilities to provide discounted mobile broadband service in all 50 states and the territories of D.C. and Puerto Rico, including plans bundling voice, text messaging, and mobile broadband services.¹⁰ 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 for the purpose of providing Lifeline services with the FCC for the states of Alabama, Connecticut, Delaware, Florida, New Hampshire, North Carolina, and the District of Columbia. GO MD USA seeks designation as a wireless ETC in Tennessee to provide Lifeline service, has filed for the same authorization from the California Public Utilities Commission to provide California Lifeline service, and has filed or will file for the same limited ETC status in other states.

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 ACP customers and (iii) invite new, underserved customers to benefit from Lifeline and other federal support 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

⁹ 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. Further, by providing Lifeline Service to eligible customers, the Company can provide them with the choice of Lifeline or ACP service immediately when Congress funds the ACP program.

¹⁰ 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).

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.

GO MD USA will provide affordable prepaid mobile phone service, including calling, text messaging, and broadband access, along with user-friendly handsets, tablet, or hotspot devices. The Company will not require service contracts from its customers, and it will always ensure competitively low pricing for its services and products. Go MD USA will manage all aspects of the customer experience, including setting service pricing, handset selection, marketing materials, and customer service. The Company's prepaid, budget-friendly pricing will give many low-income consumers the option of having mobile phone service and broadband access without the burden of hidden costs, varying monthly charges, or contractual commitments. Customers will be able to customize their GO MD USA service to suit their needs with GO MD USAs available bundles of minutes, broadband data, and text packages to supplement their monthly plan. GO MD USA's Lifeline customers will depend on, and benefit greatly from, GO MD USA's inexpensive and flexible pricing plans. GO MD USA will not impose credit checks nor will it require any deposits or contractual commitments. Many Lifeline customers turn to carriers like GO MD USA because they cannot afford the postpaid services provided by traditional wireless carriers. GO MD USA will affirmatively reach out to the low-income sector of the consumer base to offer attractive and affordable communications options. As such, GO MD USA will contribute to the expansion of mobile wireless and broadband

services for low-income consumers in Tennessee.

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.¹¹ Although Section 332(c)(3)(A) of the Act prohibits states from regulating the entry of or the rates charged by any provider of commercial mobile service or any private mobile service, this prohibition does not allow states to deny wireless carriers ETC status.⁹ Under the Act, a state public utility 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). Section 214(e)(2) of the Act provides state public utility commissions with the primary responsibility for the designation of ETCs.¹² 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 US A fulfills the requirements to be designated as an ETC in Tennessee.

IV. THE COMPANY MEETS THE REQUIREMENTS FOR ETC DESIGNATION

An application for ETC designation in Tennessee must meet specific federal statutory and regulatory requirements. Section 254(e) of the Act provides that, “only an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive specific federal universal service support.” Section 214(e)(2) of the Act authorizes state commissions,

¹¹ 47 U.S.C. § 214(e)(2).

¹² 47 U.S.C. § 214(e)(2).

such as the Commission, to designate ETC status for federal universal service purposes and authorizes the Commission to designate wireless ETCs.¹³ Section 214(e)(1) of the Act and Section 54.201(d) of the FCC’s rules provide that applicants for ETC designation must be common carriers that shall, throughout the designated service area, offer all of the services supported by universal service, either using their own facilities or a combination of their own facilities and the resale of another carrier’s services, except where the FCC has forborne from the “own facilities” requirement. Applicants also must commit to advertise the availability and rates of such services.¹⁴ As detailed below, INFINITI satisfies each of the above-listed 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 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 1988.¹⁵ In addition, an applicant seeking

¹³ See Federal-State Joint Board on Universal Service, First Report and Order, 12 FCC Rcd 8776, 8858-59, ¶ 145 (1997) (“USF Order”).

¹⁴ See 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d)(2).

¹⁵ 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).

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,¹⁶ the Commission must determine whether such designation is in the public interest.¹⁷ 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.¹⁸

A. 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. 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.¹⁹

¹⁶ 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.

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

¹⁸ 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).

¹⁹ 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). See also Implementation of Sections 3(n) and 332 of the Communications Act, Regulatory Treatment of Mobile Services, GN Docket No. 93-252, Second Report and Order, 9 FCC Rcd 1411, 1425 ¶ 37, 1454-55 ¶ 102 (1994) (wireless resellers are included in the statutory "mobile services" category, and providers of cellular service are common carriers and CMRS providers); 47 U.S.C. § 332(c)(1)(A) ("mobile services" providers are common carriers); PCIA Petition for Forbearance for Broadband PCS, WT Docket No. 98-100, (Memorandum Opinion and Order and Notice of Proposed Rulemaking, 13 FCC Rcd 16857, 16911 ¶ 111 (1998) ("We concluded [in the Second Report and Order] that CMRS also includes the following common carrier services: cellular service, ... all mobile telephone services and resellers of such services.") (emphasis added).

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.²⁰ As defined in Section 8.1(b) of the FCC's rules, GO MD USA also provides mobile broadband internet access service to consumers.²¹

GO MD USA provides voice grade access to the public switched telephone network ("PSTN") through the purchase of wholesale CMRS services from its facilities-based underlying carriers. The Company offers rate plans that provide its customers with minutes of use for local service at no additional charge. Access to Emergency Services. GO MD USA provides 911 and E911 access for all of its customers to the extent the local government in its service area has implemented 911 or E911 systems. As noted herein, calls to 911 emergency services will always be free and will be available regardless of service activation status or availability of minutes. GO MD USA also complies with the FCC's regulations governing the deployment and availability of E911 compatible handsets. In its Lifeline and Link Up Reform Order, the FCC provided that toll

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

²¹ *See* 47 C.F.R. § 8.1(b).

limitation would no longer be deemed a supported service.²² “ETCs are not required to offer toll limitation service to low-income consumers if the Lifeline offering provides a set amount of minutes that do not distinguish between toll and non-toll calls.”²³ Nonetheless, GO MD USA’s offerings inherently allow Lifeline subscribers to control their usage, as its wireless service is offered on a prepaid, or pay-as-you-go, basis. GO MD USA’s service, moreover, is not offered on a distance-sensitive basis and local and domestic long-distance minutes are treated the same.

Further, GO MD USA provides Broadband Internet access service (“BIAS”) in accordance with the FCC’s minimum service standards to ensure Lifeline customers receive full Lifeline support. The FCC has stated that BIAS consists of the ability for a user to receive “the capability to transmit data to and receive data from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up Internet access service.”²⁴ GO MD USA provides BIAS to low-income consumers via resale of Underlying Carriers’ services.

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.²⁵ 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

²² See *Lifeline and Link Up Reform Order* at ¶ 367.

²³ See *id.* at ¶ 49.

²⁴ See 47 C.F.R. § 8.2(a).

²⁵ See 47 C.F.R. § 54.101(a).

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 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 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 Tennessee 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, there is no need for GO MD USA to obtain an approved FCC Compliance Plan in accordance with the *2012 Lifeline Reform Order*.²⁶

²⁶ See *2012 Lifeline Reform Order*, ¶ 368.

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

GO MD USA is not a rural telephone company as defined in Section 153(37) of the Act (47 U.S.C. § 153(37)). Accordingly, GO MD USA is required to describe the geographic area(s) within which it requests designation as an ETC. GO MD USA requests ETC designation that is statewide in scope to allow the Company to provide Lifeline service wherever its underlying, facilities-based provider(s) have wireless coverage, including federally-recognized tribal lands.²⁷ The current Tennessee coverage footprint by zip code is attached hereto as Exhibit 3.

GO MD USA understands that its service areas overlap with rural carriers in Tennessee, but maintains that the public interest factors described below justify its designation in these carriers' service areas, especially because it seeks ETC designation solely to utilize USF funding to provide Lifeline service to qualified low-income consumers. GO MD USA does not seek Link-Up or high-cost support. 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 has 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.

Therefore, designation of GO MD USA as an ETC will cause no growth in the high-cost portions of the USF and will not erode high-cost support from any rural telephone company. In fact, the FCC has determined that “[designation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies.”²⁸ While federal rules (47 U.S.C. §§ 160, 214(e)(5) and 47 C.F.R. § 54.207(b)) require that the service area of an ETC conform to the service area of any rural telephone company serving the same area (the “service area conformance” requirement), the FCC's Lifeline and Link Up Reform Memorandum Opinion and Order

²⁷ The Company requests that the Commission expressly indicate in the ETC designation order that such designation includes federally recognized tribal lands.

²⁸ See Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming, Memorandum Opinion and Order, 16 FCC Rcd 48, 55 (2000).

(FCC 13-44 released April 15, 2013) authorized forbearance from the service area conformance requirements with respect to carriers seeking to provide Lifeline-only service.²⁹ In light of this forbearance, the Commission has the authority to designate ETCs such as INFINITI in rural areas without concern for the service area conformance requirement.³⁰

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.

E. GO MD USA 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. GO MD USA will comply with the FCC's rules regarding information to be included in marketing materials, including FCC rule section 54.405(c). Specifically, the Company's marketing materials will state, in easily understood language, that: (i) the service is a Lifeline service; (ii) Lifeline is a government assistance program; (iii) the service may not be transferred to someone else; (iv) consumers must meet certain eligibility requirements before enrolling in the Lifeline program; (v) the Lifeline program permits only one Lifeline discount per household; (vi) documentation is

²⁹ See In the Matter of Telecommunications Carriers Eligible for Support, Lifeline and Link Up Reform, WC Docket No. 09-197, WC Docket No. 11-42, Memorandum Opinion and Order, FCC 13-44 (rel. April 15, 2013).

³⁰ See 47 C.F.R. § 54.207(c).

necessary for enrollment; and (vii) GO MD USA is the provider of the services. Moreover, the Lifeline application/certification form will state that Lifeline is a federal benefit and that consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program

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

The Company will also advertise Lifetime Services on its website.

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 Commission.

G. 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 a facilities-based 5G wireless network through partnerships with others. We are scheduled to deploy to at least 85% of the population of each Partial Economic

Area this month. 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.

To ensure that consumer complaints and consumer issues are dealt with quickly and efficiently, GO MD USA LLC designates Jack Sosa, the Company's Director of Operations, 3385 Airway Blvd, Ste 201, Memphis, TN 38116, Phone: 833-706-3872, Email: jack.sosa@gomdusa.net as the contact for consumer complaints. He will be the primary point of contact for the Commission in dealing with consumer complaints and GO MD USA LLC designates Jack Sosa, 3385 Airway Blvd, Ste 201, Memphis, TN 38116, Phone: 833-706-3872, Email: jack.sosa@gomdusa.net as the contact for consumer complaints from the Commission. Its website will also direct that written consumer issues be sent to his attention.

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.

GO MD USA LLC employs 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 delivery across diverse operational requirements.

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.³¹ 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, because it does not and will not rely solely on Lifeline revenue. 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

³¹ See *2012 Lifeline Reform Order*, ¶ 387; see also 47 C.F.R. § 54.202(a)(4).

marketing and serving lower-income consumers. GO MD USA is thus fully capable of honoring all of its service obligations to customers and regulatory obligations to state and federal regulators. Furthermore, GO MD USA will be providing resold wireless service, and therefore the Company will also rely upon the managerial and technical expertise of its Underlying Carriers.

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.

GO MD USA's terms and conditions are stated and available on its website at [GO MD USA LLC Terms and Conditions](#). Customers will be directed to these terms and conditions through online marketing efforts.

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. GO MD

USA LLC agrees to offer additional minutes at a cost not to exceed \$0.05 per minute for Lifeline customers. GO MD USA LLC does not include roaming in its service offerings and will ensure no charges are applied for roaming.

In addition to wholly-supported or discounted wireless services, prepaid Lifeline customers will receive access to voicemail, caller ID and call waiting features at no additional charge. All plans will include nationwide domestic long-distance at no extra per-minute charge, and INFINITI will not assess any usage for access to its free customer services. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes. The Company's Lifeline offering will provide feature-rich mobile connectivity for qualifying subscribers without the burden of credit checks or service contracts. GO MD USA's prepaid offering will be an attractive alternative for consumers who need the mobility, security, and convenience of a wireless phone, but who are concerned about usage charges or long-term contracts

Further, 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 rules require 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 when they return. 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).³² 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 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 Abuse³³

³² *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>).

³³ 47 C.F.R. §§ 54.405(e), 54.410(f).

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 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 Tennessee, 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 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.³⁴ GO MD USA will comply with the Commission Lifeline Requirements regarding consumer safeguards, including working with the

³⁴ 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).

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 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.

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 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 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.

One of the principal goals of the Act, as amended by the Telecommunications Act of 1996, is “to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies” to all citizens, regardless of geographic location or income.³⁵ Designation of GO MD USA as an ETC in Tennessee will further that public interest. Whether because of financial constraints, poor credit history, or intermittent employment, many low-income consumers often lack the countless choices available to most consumers and thus have yet to reap the full benefits of the intensely competitive wireless market.

This request for ETC designation must be examined in light of the Act’s goal of providing low-income consumers with access to telecommunications services. The primary purpose of universal service is to ensure that consumers—particularly low-income consumers—receive affordable and comparable telecommunications services. The FCC has in recent years expanded the Lifeline program to cover broadband services, noting that “Only half of all households in the lowest income tier subscribe to a broadband service and 43 percent say the biggest reason for not subscribing is the cost of the service,” and “Of the low income consumers who have subscribed to mobile broadband, over 40 percent have to cancel or suspend their

³⁵ Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56.

service due to financial constraints.”³⁶ Given this context, designating GO MD USA as an ETC would significantly benefit low-income consumers eligible for Lifeline services in Tennessee—the intended beneficiaries of universal service.

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 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 Tennessee consumers for no cost, and a plan with unlimited voice minutes, unlimited texts and 11 GB of data available to residents of Tribal

³⁶See Lifeline Modernization Order ¶ 2.

lands for no cost. Qualified Tennessee consumers will have the choice to apply their Lifeline discount to existing GO MD USA Mobile plans.

Further, granting GO MD USA LLC's application will provide Tennessee customers whose ACP coverage has ended because of federal budget issues to have immediate internet access. GO MD USA has more than 1000 current internet clients in Tennessee whose services are suspended due to the lapse of the ACP program. A large majority of them have inquired and are qualified for Lifeline service. Upon being granted ETC status, we will be able to immediately contact these clients and inform them that they can reapply through the Lifeline program. If accepted, they will be able to reactivate their service at a Lifeline plan level right away.

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."³⁷ 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."³⁸ 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

³⁷ *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).

³⁸ *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).

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.

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 Commission designate GO MD USA as an ETC in the State of Tennessee for the purpose of participating in the Lifeline program.

Respectfully submitted,

Mark J. Schirmer
General Counsel
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 Application for Designation as an Eligible Telecommunications Carrier in the State of Tennessee. I declare under penalty of perjury under the law of Tennessee that the foregoing is true and correct.

Signed on the 17th day of July, 2024 at Memphis, Tennessee.



Apollo Arcallana

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
CODES³⁹**

37012	37059	37132
37013	37060	37134
37014	37061	37135
37015	37062	37137
37016	37064	37138
37018	37066	37140
37019	37067	37141
37020	37069	37142
37022	37072	37143
37023	37073	37144
37025	37074	37145
37026	37075	37146
37027	37076	37148
37028	37078	37149
37029	37079	37150
37030	37080	37151
37031	37082	37153
37032	37083	37160
37033	37085	37166
37034	37086	37167
37035	37087	37171
37036	37090	37172
37037	37091	37174
37040	37095	37175
37042	37096	37178
37043	37097	37179
37046	37098	37180
37047	37101	37181
37048	37110	37183
37049	37115	37184
37050	37118	37185
37051	37122	37186
37052	37127	37187
37055	37128	37188
37057	37129	37189
37058	37130	37190

³⁹ GO USA MD requests that the Commission allow this list of coverage areas in lieu of any requirement to provide a map of its proposed service area. Given the Company's commitment to provide service throughout its service areas, this should be easier for the Commission and consumers to understand.

37191	37328	37381
37201	37329	37383
37203	37330	37385
37204	37331	37387
37205	37332	37388
37206	37333	37391
37207	37334	37396
37208	37335	37397
37209	37336	37398
37210	37337	37402
37211	37338	37403
37212	37339	37404
37213	37340	37405
37214	37341	37406
37215	37342	37407
37216	37343	37408
37217	37345	37409
37218	37347	37410
37219	37348	37411
37220	37350	37412
37221	37351	37415
37228	37352	37416
37232	37353	37419
37238	37354	37421
37301	37355	37601
37302	37356	37604
37303	37357	37614
37305	37359	37615
37306	37360	37616
37307	37361	37617
37308	37362	37618
37309	37363	37620
37310	37365	37640
37311	37366	37641
37312	37367	37642
37313	37369	37643
37317	37370	37645
37318	37373	37650
37321	37374	37656
37322	37375	37657
37323	37376	37658
37324	37377	37659
37325	37379	37660
37327	37380	37663

37664	37762	37862
37665	37763	37863
37680	37764	37865
37681	37765	37866
37683	37766	37869
37686	37769	37870
37687	37770	37871
37688	37771	37872
37690	37772	37873
37691	37774	37874
37692	37777	37876
37694	37779	37877
37701	37801	37878
37705	37803	37879
37708	37804	37880
37709	37806	37881
37710	37807	37882
37711	37809	37885
37713	37810	37886
37714	37811	37887
37715	37813	37888
37716	37814	37890
37721	37818	37891
37722	37819	37892
37723	37820	37902
37724	37821	37909
37725	37825	37912
37726	37826	37914
37727	37828	37915
37729	37829	37916
37731	37830	37917
37737	37840	37918
37738	37841	37919
37742	37843	37920
37743	37846	37921
37745	37847	37922
37748	37848	37923
37752	37849	37924
37753	37852	37931
37754	37853	37932
37755	37854	37934
37756	37857	37938
37757	37860	37996
37760	37861	37998

38001	38106	38253
38002	38107	38255
38004	38108	38256
38006	38109	38257
38008	38111	38258
38011	38112	38259
38012	38114	38260
38015	38115	38261
38016	38116	38301
38017	38117	38305
38018	38118	38310
38019	38119	38311
38023	38120	38313
38024	38122	38315
38028	38125	38316
38030	38126	38317
38034	38127	38318
38037	38128	38320
38039	38133	38321
38040	38134	38326
38041	38135	38327
38042	38138	38328
38044	38139	38329
38047	38141	38330
38049	38152	38332
38052	38201	38333
38053	38220	38334
38057	38221	38337
38058	38222	38339
38059	38224	38340
38060	38225	38341
38061	38226	38342
38063	38229	38343
38066	38230	38344
38067	38231	38345
38068	38232	38347
38069	38233	38348
38075	38236	38351
38076	38237	38352
38079	38238	38355
38080	38240	38356
38103	38241	38357
38104	38242	38358
38105	38251	38359

38361	38475	38577
38362	38476	38579
38363	38477	38580
38366	38478	38581
38367	38481	38582
38368	38482	38583
38369	38483	38585
38370	38485	38587
38371	38486	38588
38372	38487	38589
38374	38488	
38375	38501	
38376	38504	
38379	38505	
38380	38506	
38381	38541	
38382	38543	
38387	38544	
38388	38545	
38390	38547	
38391	38548	
38392	38549	
38401	38551	
38425	38552	
38449	38553	
38450	38554	
38451	38555	
38452	38556	
38453	38558	
38454	38559	
38456	38560	
38457	38562	
38459	38563	
38460	38564	
38461	38565	
38462	38567	
38463	38568	
38464	38569	
38468	38570	
38469	38571	
38471	38572	
38472	38573	
38473	38574	
38474	38575	

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 secured funding commitments from multiple partners, ensuring sufficient financial support for its business plans. Moreover, the company does not heavily rely on ACP or Lifeline revenue, as these income streams constitute only a minor portion of its operations. Our Q1 2024 financial statement will be confidentially filed with this petition.

EXHIBIT 6

BIOGRAPHIES OF KEY COMPANY PERSONNEL

Apollo Arcallana, CFO:

With a background in accounting, Apollo Arcallana has demonstrated his versatility by branching into the insurance industry six years ago. As a licensed professional in all 50 states for life, health, property, and casualty insurance, Apollo brings a wealth of expertise to his role as CFO of GO MD USA LLC. He skillfully manages the company's day-to-day financial operations and ensures that all financial responsibilities are met with the utmost attention to detail.

Arfie Dajas, VP of Technology:

As a developer with over 15 years of telecom experience in software, hardware, VOIP soft switches, OSS BSS platforms, and 20 years of software development experience in various frameworks, Arfie Dajas is a technology leader with a proven track record of success. He is responsible for managing both internal technology and third-party relationships and integrations at GO MD USA LLC. Arfie's instrumental role in developing GO MD USA LLC's technology, as well as its integrations with Telgoo5, a core OSS BSS platform used by many ETCs to enroll clients in Lifeline and ACP services, has been critical to the company's success. He oversees all technical and non-technical aspects of MVNO operations and network integrations with AT&T and T-Mobile as GO MD USA LLC's underlying network providers.

AJ Sosa, Vice President of Operations:

AJ Sosa serves as the Vice President of Operations at GO MD USA, bringing a wealth of experience and a robust educational background to the role. AJ holds a degree in Business Administration from Palm Beach State College and is a licensed insurance professional. His comprehensive expertise spans building and guiding high-performing teams across sales, customer service, and support departments.

In his capacity at GO MD USA, AJ oversees critical functions including the fulfillment and device departments, as well as the customer service and tech support teams. His role is pivotal to the seamless operation of GO MD USA, ensuring that the company's services are delivered efficiently and effectively to meet customer needs. AJ's strategic oversight and operational leadership have been instrumental in the company's success and growth over the years.

AJ has been a dedicated member of the GO MD USA team for several years, where he has consistently demonstrated his ability to manage complex operations and drive organizational excellence. His commitment to enhancing operational processes and improving customer satisfaction underscores his value as an integral part of the company's leadership team. AJ's proactive approach and strategic vision continue to contribute significantly to the overall success and sustainability of GO MD USA.