

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

IN RE: PETITION OF GO MD USA LLC)
FOR DESIGNATION AS AN ELIGIBLE)
TELECOMMUNICATIONS CARRIER IN) Docket No. 24-00046
THE STATE OF TENNESSEE FOR THE)
LIMITED PURPOSE OF PROVIDING)
LIFELINE SERVICE TO QUALIFYING)
CUSTOMERS)

DECLARATION OF MARK J. SCHIRMER IN SUPPORT OF THE GO MD USA
LLC’S MOTION TO RECONSIDER

Mark J. Schirmer deposes and says under penalty of perjury pursuant to Tennessee
and United States federal law:

1. My name is Mark J. Schirmer. I am the General Counsel of GO MD USA
LLC (“GO MD” or the Company”).
2. GO MD has petitioned this Commission for an order designating it as an
Eligible Telecommunications Carrier under 47 U.S.C. Section 214, for the
limited purpose of providing voice and data telecommunications service to
low income Tennessee residents.
3. On March 28, 2025, the Commission issued an order denying GO MD’s
application. The Commission’s stated reasons were GO MD does not meet
the requirements for that designation. This Declaration supplements the
record, providing evidence that could help the Commission review its

decision and evidence that GO MD was not asked to provide – and did not understand was necessary under the law.

GO MD SEEKS TO PROVIDE LIFELINES SERVICES TO LOW INCOME TENNESSEE RESIDENTS THROUGH A COMBINATION OF ITS OWN AND RESOLD FACILITIES.

4. First, GO MD seeks to provide both the voice and data services required to be provided under the Lifeline Program. It does not seek to provide only one service or the other, nor would that be acceptable under the Lifeline rules and regulations.
5. To provide these services, GO MD will, as it affirmed in its petition and as stated in the affidavit of its president provided to Commission staff, provide these services by using a combination of its own facilities and those of other companies.
6. Much of the work of providing consumer service is done through GO MD's core network with computers and routers located at its main offices in Memphis Tennessee. Signing up individuals for service, checking their service and eligibility for service, and routing their service correctly is done through GO MD's "Core Network" or NOD.
7. This Core Network – an advanced platform (using equipment located on site in Memphis Tennessee) integrates SIM provisioning, intelligent routing, secure authentication, client management, and financial tracking. This

system is designed to ensure seamless operations, maximum uptime, and an efficient user experience.

8. For example, GO MD's automated system streamlines the process of activating and managing SIM cards, ensuring instant connectivity for both voice and data communications.
9. The system also uses dynamic routing algorithms to ensure data flows through the most efficient paths, reducing latency and improving overall performance.
10. The system also uses advanced encryption and multi-layer authentication to keep client data secure while ensuring regulatory compliance.
11. GO MD has a fully integrated CRM system that tracks client accounts, service activations, and real-time usage, ensuring smooth operations and top-tier customer support. This includes an advanced billing engine that tracks balances, invoices, and automated payments to ensure seamless financial operations for clients and agents.
12. The System is designed to handle high-volume transactions and rapid expansion, ensuring GO MD can scale effortlessly while maintaining reliability.

13. In providing voice and data service, GO MD will, where practicable, use microtowers it will own installed on telephone or light towers to facilitate and enhance voice and data service using the Third Tier CBRS system.
14. These microtowers can connect to existing and new fiber networks as needed to provide the most efficient routing for service. The Micro Towers are mounted on light poles to provide wireless connectivity via CBRS spectrum.
15. Microtowers are cells that act as localized coverage hubs for client devices (phones, tablets, IoT). These devices are provided by GO MD free of charge.
16. Each Micro Tower is connected to the internet via a Fiber Backhaul which provides high speed access and routes traffic to the public internet and our primary operations center.
17. All internet traffic is authenticated and managed via the GO MD Core Network before reaching external networks. This ensures secure and optimized routing for all connected client devices.
18. At least initially, voice traffic will be routed over T-Mobile or AT&T networks for high-quality calling.
19. If connected via a CBRS Micro Tower, internet traffic flows through the fiber connection. If no GO MD Micro Tower is available, data flows directly over a T-Mobile or AT&T network.

20. The fiber backhaul transmits data traffic to the public internet or the Company's NOC.

21. The following is a Text-Based Flowchart that illustrates the set up in greater detail:

A. Micro Tower (CBRS Small Cell) Mounted on Light Poles

- |— Provides wireless connectivity via CBRS spectrum
- |— Acts as a localized coverage hub for client devices
- |— GO MD USA devices (provided free of charge) support all services
- |— Connects to Fiber Backhaul for internet access

B. Fiber Backhaul Connection

- |— Micro Tower connects to high-speed internet via fiber
- |— Routes traffic to:
 - | |— Public Internet
 - | |— Primary Network Operations Center (NOC)

C. Core Network Authentication

- |— Internet traffic is authenticated via GO MD USA Core Network
- |— Ensures secure and optimized routing for all devices

D. Voice and Data Routing

- |— Voice Traffic:
 - | |— Exclusively routed over T-Mobile or AT&T networks

- | └─ Maintains high-quality voice calls
- | └─ Data Traffic:
 - | └─ If connected via CBRS Micro Tower → Routed over Fiber Backhaul
 - | └─ If no Micro Tower connection → Data flows over T-Mobile or AT&T network
- | └─ If using non-GO MD USA equipment → Data managed entirely by T-Mobile or AT&T

E. Internet Access and Public Network Routing

- | └─ Fiber Backhaul transmits data to:
 - | └─ Public Internet
 - | └─ Primary NOC
- | └─ If GO MD USA services are unavailable → Traffic is handled by T-Mobile or AT&T

F. Primary Services Available

- | └─ T-Mobile and AT&T are the primary voice providers
- | └─ Devices route data and voice based on the client's network setup
- | └─ If no Micro Tower connection is available → Devices default to T-Mobile or AT&T network

22. The Commission also stated that GO MD USA must provide an approved FCC Compliance Plan because it provides service only as a reseller and not using its own facilities. As noted above, this is incorrect. However, the

Commission would have set an impossible standard if in fact it pursues that requirement.

23. As I discussed with Commission staff, I have reviewed EVERY DOCKET entry for the FCC for the past three years. During that time, the FCC has not acted on – and certainly has not approved – even one wholly new compliance plan for companies that provide services similar to GO MD. No relevant compliance plan has been acted on since GO MD was formed.

24. The staff and Commission were provided with a Compliance plan modeled word for word (in substantive areas) on the last approved compliance plan. Another copy accompanies this Declaration.

25. GO MD had provided the type of service it seeks to provide through this application under the ACP Program and demonstrated its ability to provide such services by remaining an approved program provider with customers throughout the United States.

I declare that the foregoing is true and correct under penalty of perjury.

Dated: April 14, 2025

/s/ *Mark J. Schirmer*