

GO MD USA LLC

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July 23, 2024

VIA ELECTRONIC DELIVERY

Michelle L. Phillips, Secretary
State of New York
Department of Public Services
Three Empire State Plaza
Albany, New York 12223

Re: Go MD USA, LLC's Application of Go MD USA LLC For a Limited Designation as an Eligible Telecommunications Carrer for the Purpose of Offering and Operating a Lifeline Service for Low Income Consumers

Attached please find for filing Go MD USA LLC's Application of Go MD USA LLC For a Limited Designation as an Eligible Telecommunications Carrer for the Purpose of Offering and Operating a Lifeline Service for Low Income Consumers, pursuant to 16 NYCRR §3.5.

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 Vice President and Head of Operations Jack Sosa at (833) 706-3872.

Thank you.

Sincerely,

/s/ Mark J. Schirmer
Mark J. Schirmer
General Counsel
Go MD USA

Attachments

cc: APOLLO ARCALLANA, PRESIDENT
Michael Campbell, Corporate Counsel
Go MD USA LLC

**STATE OF NEW YORK
DEPARTMENT OF PUBLIC SERVICES**

In the Matter of GO MD USA LLC's Application for Designation as an Eligible Telecommunications Carrier in the State of New York for the Limited Purpose of Providing Lifeline Service to Qualifying Customers	DOCKET NO. _____
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APPLICATION

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TABLE OF CONTENTS

- I. INTRODUCTION
- II. COMPANY OVERVIEW
- III. THE COMMISSION HAS JURISDICTION OVER DESIGNATION OF WIRELESS ETCs
- IV. THE COMPANY MEETS THE REQUIREMENTS FOR ETC DESIGNATION
 - A. GO MD USA LLC Wireless Is a Common Carrier
 - B. GO MD USA Will Offer the Services Supported by Federal Universal Service
 - C. GO MD USA Will Offer the Services Designated for Support Using a Combination of Its Own Facilities and Resale
 - D. GO MD USA Will Provide GO MD USA Mobile-Branded Service Throughout Its Designated Service Area
 - E. The Company Will Advertise the Availability of GO MD USA Mobile Services and Charges Using Media of General Distribution
 - F. GO MD USA Will Comply with Service Requirements Applicable to the Support It Receives
 - G. GO MD USA Will Comply with Any Applicable Two-Year and Five-Year Requirements
 - H. Consumer Protection and Service Quality Standards
 - I. Ability to Remain Functional During Emergencies
 - J. GO MD Is Financially and Technically Capable
 - K. Terms and Conditions of the Proposed Lifeline Offering
 - L. GO MD USA Will Comply with Lifetime Certification and any Annual Re-Certification Requirements
 - M. Prevention of Waste, Fraud and Abuse
 - N. GO MD Will Comply with All Commission Requirements

V. DESIGNATING GO MD AS AN ETC FOR THE LIMITED PURPOSE OF PROVIDING LIFELINE SERVICES WOULD PROMOTE THE PUBLIC INTEREST

- A. Advantages of GO MD USA Mobile Lifeline Plans
- B. Benefits of Competitive Choice

VI. ANTI-DRUG ABUSE CERTIFICATION

VII. CONCLUSION

LIST OF EXHIBITS:

Exhibit 1 – Verification

Exhibit 2 - Proposed Lifeline Plans

Exhibit 3 - Service Area Zip Codes

Exhibit 4 - Sample Advertising

Exhibit 5 – Financial Statements

Exhibit 6 – Key Personnel Bios

BEFORE THE NEW YORK PUBLIC SERVICE COMMISSION

In the Matter of the Petition of
GO MD USA LLC

DOCKET NO. _____

FOR LIMITED DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS
CARRIER

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 including the requirements outlined in the FCC’s Lifeline and Link Up Reform Order,⁴ Lifeline Modernization Order,⁵ and Fifth Report and

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”)

⁴ 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”).

⁵ 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”).

Order,⁶ and the rules of the New York Public Service Commission (the “Commission”),⁷ and New York law, hereby submits this Petition for Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of New York. The Company seeks ETC designation for the limited purpose of providing Lifeline service under the brand name “GO MD USA Mobile” to qualifying New York consumers subject to the service areas served by the Company’s underlying wireless carriers, AT&T and T-Mobile.

The Company seeks this limited ETC designation in the State of New York only for the purpose of receiving and providing low-income consumers with Lifeline services and support in rural and non-rural areas, starting with offering the Lifeline service to customers who had been served under the ACP program. The Company does not make an application for ETC designation to offer services supported by federal universal service funds and high-cost programs.

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. Granting this Petition, moreover, would advance the public interest because it would enable the Company to commence much needed Lifeline services to low-income New York residents as soon as possible. Accordingly, the Company respectfully requests that the New York Commission expeditiously approve this Petition.

⁶ 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”).

⁷ See 16 NYCRR § 3.5.

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

Mark Schirmer, General Counsel
GO MD USA LLC
3385 Airways Blvd., Ste 201
Memphis, TN 38116
markschirmer1@gmail.com
markschirmer@gomdusa.net
901-230-4697 (direct line)

Upon receiving the requested designation as an ETC, the Company will provide the supported services through the requested designated service area and Offer Lifeline service to qualified low- income consumers.

Specific Summary Information for the Commission:

1. Company Name and information:

- Name: GO MD USA LLC.⁸
- Headquarters Address: 3385 Airways Blvd, Suite 201, Memphis, TN 38116
- Correspondence regarding this Petition should be directed to

Mark Schirmer, General Counsel
Go MD USA LLC
3385 Airways Blvd., Ste 201
Memphis, TN 38116
markschirmer1@gmail.com
markschirmer@gomdusa.net
901-230-4697 (direct line)

- Correspondence regarding Customer Complaints or operations should be addressed to the above and
Jack Sosa, VP and Head of Operations

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

Go MD USA LLC
3385 Airways Blvd., Ste 201
Memphis, TN 38116
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(833) 706-3872

2. Company Qualification.

The Company is qualified to do business in New York and, while the program was funded, provided services to New York residents under the Affordable Connectivity Program (“ACP”). Copies of the Company’s Corporate documents accompany this petition.

3. The Company does not switch customers to its service without prior consumer consent and has not been subject to any consumer complaints regarding such.

4. Overview of Services to be Offered.

The Company will offer Lifeline services to low-income consumers (as noted in Exhibit 2) in the identified zip codes in New York through reselling access to the AT&T and T-Mobile Networks. It seeks only approval to offer those services to low-income New York residents – mainly those who the Company served through the ACP program.

Approval of this petition will serve the public interest by expanding telecommunications choices for low-income New Yorkers, providing them with an option (or additional option to compete with existing options) for service.

5. The Company’s EIN is 92143 5506.

II. COMPANY OVERVIEW

GO MD USA LLC is a South Dakota limited liability company with a principal address at

3385 Airways BLVD STE 201, Memphis, TN 38116. GO MD USA provides, among other things, resold wireless telecommunications services operating in New York 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.

Even as the 5G network partner relationships are expanding, GO MD USA will be competing in the retail wireless space and has been and will seek to be an approved provider in the Federal Communications Commission's Affordable Connectivity Program.⁹ Under the GO MD USA Mobile name, GO MD USA has and will use 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

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).

under the ACP's monthly \$30 subsidy for eligible consumers. GO MD USA will submit an application for ETC designation with the FCC for the states of Alabama, Connecticut, Delaware, Florida, New Hampshire, North Carolina, and the District of Columbia. GO MD USA seeks designation as a wireless ETC in New York, is seeking similar authorization by the California Public Utilities Commission to provide California Lifeline service and has filed or plans to file for ETC status in other states so it can provide Lifeline Service nationwide.

GO MD USA now seeks an ETC designation in New York so that it can (i) serve low-income New York 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 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 2024 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.¹¹ 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).

¹¹ 47 U.S.C. § 214(e)(2).

Therefore, the Commission has the authority to designate GO MD USA as an ETC.¹² As demonstrated below, GO MD USA fulfills the requirements to be designated as an ETC in New York.

IV. THE COMPANY MEETS THE REQUIREMENTS FOR ETC DESIGNATION

An application for ETC designation 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. And will provide the services defined in 47 C.F.R. Section 54.101(a). 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, including voice grade access to the public network; 2) locale usage; 3) dual tone multi-frequency signaling or its functional equivalent; 4) single party service or its functional equivalent; 5) access to emergency services; 6) access to operator services; (6) 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; (7) a description of how the applicant advertises the availability of the supported services and the charges therefor using media of general distribution; (8) a detailed description of the geographic service area for which the applicant requests to be designated as an ETC; and (9) 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 1988.¹³ In addition, an applicant seeking designation as an ETC solely for

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

¹³ 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).

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,¹⁴ the Commission must determine whether such designation is in the public interest.¹⁵ 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.¹⁶

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.¹⁷

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

¹⁴ 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.

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

¹⁶ 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).

¹⁷ 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).

Service

Pursuant to Section 54.101(a) of the FCC's rules, GO MD USA' 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.¹⁸ As defined in Section 8.1(b) of the FCC's rules, GO MD USA also provides mobile broadband internet access service to consumers.¹⁹

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.²⁰ 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 New York 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

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

¹⁹ *See* 47 C.F.R. § 8.1(b).

²⁰ *See* 47 C.F.R. § 54.101(a).

networks. This will allow GO MD USA to immediately introduce new Lifeline options for New York 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. The Company will be providing 5G broadband service throughout the U.S. In areas of New York 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. In New York 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*.²¹

C. 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 has and will offer ACP service – this includes the entire geographic boundary of the State of New York, subject to coverage limits of underlying carriers and GO MD USA's partner networks. Further, pursuant to 47 C.F.R. § 54.202(a)(1)(i), the Company commits to provide service throughout its proposed service area on a timely basis to all customers making a reasonable request for service where facilities are available. GO MD USA requests ETC designation that is statewide in scope, within the limits of the accompanying list of zip codes Go MD USA currently is prepared to serve, to allow the Company to provide Lifeline service wherever its underlying, facilities-based providers have wireless coverage. The current New York coverage footprint by zip code is attached hereto as Exhibit 3. The Company certifies that it will provide

²¹ See *2012 Lifeline Reform Order*, ¶ 368.

service within a reasonable period of time, if the potential customer is within the Company's licensed service area but outside its existing network coverage, if service can be provided at reasonable cost by 1) modifying or replacing the requesting customer's equipment; 2) deploying a roof-mounted antenna or other equipment; 3) adjusting the nearest cell tower; 4) adjusting relevant facilities; 5) reselling services from another carrier to provide service; or employing, leasing or constructing an additional cell site, extender, repeater, or similar equipment. See 47 C.F.R. Section 54.2020(a).

D. 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. 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.

E. 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 New York 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.

F. 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 a facilities-based 5G wireless network through partnerships with others. The Company will provide nationwide coverage and is deploying to deploy to at least 85% of the population of each Partial Economic Area this month (July 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.

G. 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.

H. 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.

I. Consumer Certification

Consistent with 47 C.F.R. § 54.409, the Company shall obtain a consumer's signature on a document under penalty of perjury that the consumer receives benefits under an approved assistance program or that the consumers' household meets applicable income requirements; and that the consumer will notify the Company if the consumer ceases participation in a program or his income criteria exceeds approved thresholds. The Company shall obtain this certification annually and shall put in place quality control mechanisms to ensure that only eligible consumers are participating in Lifeline.

J. GO MD USA Is Financially and Technically Capable

As part of the *2012 Lifeline Reform Order*, the FCC amended its rules to require a carrier seeking designation as a Lifeline-only ETC to demonstrate that it is financially and technically capable of providing the supported Lifeline service in compliance with all of the low-income program rules.²² GO MD USA satisfies these criteria.

GO MD USA is financially stable and capable of honoring its service obligations to customers, as shown in Exhibit 5, as well as meeting its federal and state regulatory obligations. The Company will not rely exclusively on revenues from the provision of Lifeline services for its

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

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 New York 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 and serving lower-income consumers.

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 New York. 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 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).²³ For applicants verified as being eligible by USAC’s National Verifier and NLAD, GO MD USA will complete enrollment by transmitting the required information into NLAD as required by Section 54.404(b)(6) of the FCC’s rules. In addition, at the time of enrollment, the Company will notify the applicant that the prepaid service must be personally activated by the subscriber and the subscriber must use their service every thirty (30) days in order to maintain their Lifeline benefit and ACP benefits.

GO MD USA will also comply with Sections 54.410(f) of the FCC’s rules governing annual subscriber re-certification of eligibility and will coordinate with USAC’s National Verifier and NLAD systems to manage additional de-enrollments related to USAC-administered benefit transfers and failure to re-certify.

M. Prevention of Waste, Fraud and Abuse²⁴

The Company recognizes the importance of safeguarding the Universal Service Fund (“USF”) and has implemented measures and procedures to prevent duplicate Lifeline and ACP benefits being awarded to the same household. GO MD USA Mobile Lifeline offerings will comply with the requirements of the NLAD and section 54.404 of the FCC’s rules. As part of the application process, the National Verifier queries the NLAD for every enrollment to determine whether a prospective subscriber is currently receiving a Lifeline service or ACP Service from GO MD USA or any other ETC, and whether anyone else living at the prospective

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

²⁴ 47 C.F.R. §§ 54.405(e), 54.410(f).

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 and any rules and regulations applicable to ETCs offering Lifeline Services in New York. As such, within 30 days of designation as an ETC and prior to offering Lifeline service in New York, GO MD USA will submit the following information to the Commission: (1) Lifeline application form; (2) advertising and marketing materials that GO MD USA plans to use in New York; (3) rates, terms, and conditions of its Lifeline service offerings in New York; (4) contact information for the Company's customer service designee; and (5) the Company's proposed method and timing of annual recertifications and a sample recertification notice.²⁵ GO MD USA will comply with the Lifeline Requirements regarding consumer safeguards, including working with the Commission staff to resolve Lifeline subscriber disputes, providing 60 days' notice to subscribers and the Commission of a planned discontinuance of Lifeline service, and working with the Commission to facilitate a smooth transition of subscribers to an alternative ETC in the event of a discontinuance of service. GO MD USA will 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

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

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 TO PROVIDE LIFELINE SERVICES 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 New York consumers in particular, are suffering from the lack of affordable and available access. The Company is currently helping to close the gap by seeking approval to providing service under the ACP and stands ready to expand consumer choice and continue offering discounted services as a Lifeline ETC to customers who have come to rely on these benefits. In addition, because GO MD USA is planning to deploy a new facilities-based wireless 5G network throughout the country over the next several years, designating GO MD USA as an ETC will improve its ability to apply for state broadband funding grants, should ETC designation be required, to increase service in underserved and unserved areas.

A. Advantages of GO MD USA Mobile Lifeline Plans and ACP Plans

Authorizing the Company as a Lifeline ETC in the State of New York 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 New York 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 New York 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 New York 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 New York 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."²⁶ In rural and high-cost areas, the FCC determined that "designation of competitive ETCs promotes competition and benefits consumers ... by increasing customer choice, innovative services, and new technologies."²⁷ In the Lifeline context, the entry of additional providers increases competitive choice for lower-income customers who may not be the focus of wireless carriers' marketing efforts. Launching GO MD USA Lifeline options in New York 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 New York market for Lifeline services by making these services more available and accessible, thereby supporting the goals of universal service.

²⁶ *Federal-State Joint Board on Universal Service, Celco Partnership d/b/a Bell Atlantic Mobile, Petition for Designation as an Eligible Telecommunications Carrier*, Memorandum, Opinion and Order, CC Docket No. 96-45, DA 00-2895, ¶ 14 (rel. Dec. 26, 2000).

²⁷ *See Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, Memorandum Opinion and Order, CC Docket No. 96-45, DA 00-2896, ¶ 17 (rel. Dec. 26, 2000).

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, limited designation of GO MD USA as an ETC in the State of New York 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 New York for the purpose of participating in the Lifeline program.

Respectfully submitted,

Mark J. Schirmer
General Counsel
GO MD USA LLC

July 23, 2024

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

Signed on the 23rd 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:
NEW YORK COVERAGE AREA ZIP CODES²⁸

10001	10038	10459
10002	10039	10460
10003	10040	10461
10004	10044	10462
10005	10065	10463
10006	10069	10464
10007	10075	10465
10009	10106	10466
10010	10107	10467
10011	10128	10468
10012	10162	10469
10013	10279	10470
10014	10280	10471
10016	10282	10472
10017	10301	10473
10018	10302	10474
10019	10303	10475
10021	10304	10501
10022	10305	10502
10023	10306	10503
10024	10307	10504
10025	10308	10505
10026	10309	10506
10027	10310	10507
10028	10312	10509
10029	10314	10510
10030	10451	10511
10031	10452	10512
10032	10453	10514
10033	10454	10516
10034	10455	10517
10035	10456	10518
10036	10457	10519
10037	10458	10520

²⁸ GO USA MD requests that the Commission accept this list of covered zip codes in lieu of any requirement to provide a map of covered areas. Given GO MD USA's commitment to provide coverage throughout these service areas, this should be clearer to both the Commission and the consumer.

10522	10603	10958
10523	10604	10960
10524	10605	10962
10526	10606	10963
10527	10607	10964
10528	10701	10965
10530	10703	10968
10532	10704	10969
10533	10705	10970
10535	10706	10973
10536	10707	10974
10537	10708	10975
10538	10709	10976
10541	10710	10977
10543	10801	10980
10546	10803	10983
10547	10804	10984
10548	10805	10985
10549	10901	10986
10550	10913	10987
10552	10914	10988
10553	10916	10989
10560	10917	10990
10562	10918	10992
10566	10919	10993
10567	10920	10994
10570	10921	10996
10573	10922	10998
10576	10923	11001
10577	10924	11003
10578	10925	11004
10579	10926	11005
10580	10927	11010
10583	10928	11020
10588	10930	11021
10589	10931	11023
10590	10933	11024
10591	10940	11030
10594	10941	11040
10595	10950	11042
10596	10952	11050
10597	10953	11096
10598	10954	11101
10601	10956	11102

11103	11249	11433
11104	11354	11434
11105	11355	11435
11106	11356	11436
11109	11357	11439
11201	11358	11501
11203	11360	11507
11204	11361	11509
11205	11362	11510
11206	11363	11514
11207	11364	11516
11208	11365	11518
11209	11366	11520
11210	11367	11530
11211	11368	11542
11212	11369	11545
11213	11370	11547
11214	11372	11548
11215	11373	11549
11216	11374	11550
11217	11375	11552
11218	11377	11553
11219	11378	11554
11220	11379	11557
11221	11385	11558
11222	11411	11559
11223	11412	11560
11224	11413	11561
11225	11414	11563
11226	11415	11565
11228	11416	11566
11229	11417	11568
11230	11418	11569
11231	11419	11570
11232	11420	11572
11233	11421	11575
11234	11422	11576
11235	11423	11577
11236	11426	11579
11237	11427	11580
11238	11428	11581
11239	11429	11590
11242	11430	11596
11243	11432	11598

11691	11753	11933
11692	11754	11934
11693	11755	11935
11694	11756	11937
11697	11757	11939
11701	11758	11940
11702	11762	11941
11703	11763	11942
11704	11764	11944
11705	11765	11946
11706	11766	11948
11709	11767	11949
11710	11768	11950
11713	11769	11951
11714	11770	11952
11715	11771	11953
11716	11772	11954
11717	11776	11955
11718	11777	11956
11719	11778	11957
11720	11779	11958
11721	11780	11959
11722	11782	11960
11724	11783	11961
11725	11784	11962
11726	11786	11963
11727	11787	11964
11729	11788	11965
11730	11789	11967
11731	11790	11968
11732	11791	11970
11733	11792	11971
11735	11793	11972
11738	11794	11975
11739	11795	11976
11740	11796	11977
11741	11797	11978
11742	11798	11980
11743	11801	12007
11746	11803	12008
11747	11804	12009
11749	11901	12010
11751	11930	12015
11752	11932	12017

12018	12075	12156
12019	12076	12157
12020	12077	12158
12022	12078	12159
12023	12083	12160
12024	12084	12164
12025	12086	12165
12027	12087	12166
12028	12090	12167
12029	12092	12168
12031	12093	12169
12032	12094	12170
12033	12095	12172
12035	12106	12173
12036	12108	12174
12037	12110	12175
12041	12115	12176
12042	12116	12177
12043	12117	12180
12045	12118	12182
12046	12120	12183
12047	12121	12184
12051	12122	12185
12052	12123	12186
12053	12124	12187
12054	12125	12188
12056	12130	12189
12057	12131	12190
12058	12134	12192
12059	12136	12193
12060	12137	12194
12061	12138	12196
12062	12139	12197
12063	12140	12198
12064	12143	12202
12065	12144	12203
12066	12147	12204
12067	12148	12205
12068	12149	12206
12069	12150	12207
12070	12151	12208
12071	12153	12209
12072	12154	12210
12074	12155	12211

12222	12448	12503
12302	12449	12507
12303	12450	12508
12304	12451	12513
12305	12453	12514
12306	12454	12515
12307	12455	12516
12308	12456	12517
12309	12457	12518
12401	12458	12520
12404	12459	12521
12405	12460	12522
12406	12461	12523
12407	12463	12524
12409	12464	12525
12410	12465	12526
12411	12466	12528
12412	12468	12529
12413	12469	12531
12414	12470	12533
12416	12472	12534
12418	12473	12538
12419	12474	12540
12421	12475	12542
12422	12477	12543
12423	12480	12545
12424	12481	12546
12427	12482	12547
12428	12483	12548
12429	12484	12549
12430	12485	12550
12431	12486	12553
12432	12487	12561
12433	12489	12563
12434	12490	12564
12435	12491	12566
12436	12492	12567
12438	12493	12569
12439	12494	12570
12440	12495	12571
12442	12496	12572
12443	12498	12574
12444	12501	12575
12446	12502	12577

12578	12766	12839
12580	12768	12841
12581	12770	12842
12582	12771	12843
12583	12775	12844
12585	12776	12845
12586	12777	12846
12589	12778	12847
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12601	12785	12852
12603	12786	12853
12701	12788	12855
12719	12789	12856
12720	12790	12857
12721	12791	12858
12723	12792	12859
12725	12801	12860
12726	12803	12861
12729	12804	12863
12732	12808	12865
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12734	12810	12870
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12742	12817	12883
12743	12819	12884
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12747	12822	12887
12748	12823	12901
12749	12824	12903
12751	12827	12910
12752	12828	12912
12754	12831	12913
12758	12832	12914
12759	12833	12916
12760	12834	12917
12762	12835	12918
12763	12836	12919
12764	12837	12920
12765	12838	12921

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12923	12986	13077
12924	12987	13078
12926	12989	13080
12927	12992	13081
12928	12993	13082
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12960	13042	13135
12962	13044	13136
12964	13045	13140
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12966	13053	13142
12967	13054	13143
12969	13057	13144
12970	13060	13145
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12973	13063	13147
12974	13066	13148
12976	13068	13152
12978	13069	13153
12979	13071	13155
12980	13072	13156
12981	13073	13157
12983	13074	13158

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13163	13329	13433
13164	13331	13435
13165	13332	13436
13166	13334	13437
13167	13335	13438
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13203	13338	13440
13204	13339	13441
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13212	13354	13461
13214	13355	13464
13215	13357	13468
13219	13360	13469
13224	13361	13470
13244	13363	13471
13302	13364	13472
13303	13365	13473
13304	13367	13476
13305	13368	13477
13308	13402	13478
13309	13403	13480
13310	13406	13483
13312	13407	13485
13313	13408	13486
13315	13409	13488
13316	13410	13489
13317	13411	13490
13318	13413	13491
13319	13415	13492
13320	13416	13493
13321	13417	13494
13322	13418	13495
13323	13420	13501
13324	13421	13502
13325	13424	13601

13602	13664	13757
13603	13665	13760
13605	13666	13774
13606	13667	13775
13607	13668	13776
13608	13669	13777
13611	13670	13778
13612	13672	13780
13613	13673	13782
13614	13676	13783
13615	13679	13784
13616	13680	13786
13617	13681	13787
13618	13682	13788
13619	13684	13790
13620	13685	13795
13621	13687	13796
13622	13690	13797
13624	13691	13801
13625	13692	13802
13626	13693	13803
13628	13694	13804
13630	13695	13806
13633	13696	13807
13634	13697	13808
13635	13730	13809
13636	13731	13810
13637	13732	13811
13638	13733	13812
13640	13734	13813
13642	13736	13815
13646	13739	13820
13648	13740	13825
13650	13743	13827
13651	13744	13830
13652	13746	13832
13654	13748	13833
13655	13750	13834
13656	13751	13835
13658	13752	13838
13659	13753	13839
13660	13754	13841
13661	13755	13842
13662	13756	13843

13844	14052	14136
13846	14054	14138
13849	14055	14139
13850	14057	14141
13856	14058	14143
13859	14059	14145
13861	14060	14150
13862	14062	14167
13863	14063	14170
13864	14065	14171
13865	14066	14172
13901	14067	14173
13903	14068	14174
13904	14069	14201
13905	14070	14202
14001	14072	14203
14004	14075	14204
14005	14080	14206
14006	14081	14207
14008	14082	14208
14009	14083	14209
14011	14085	14210
14012	14086	14211
14013	14091	14212
14020	14092	14213
14024	14094	14214
14025	14098	14215
14026	14101	14216
14028	14102	14217
14030	14103	14218
14031	14105	14219
14032	14108	14220
14033	14109	14221
14034	14111	14222
14036	14113	14223
14037	14120	14224
14039	14125	14225
14040	14126	14226
14041	14127	14227
14042	14129	14228
14043	14131	14260
14047	14132	14261
14048	14134	14301
14051	14135	14303

14304	14489	14580
14305	14502	14585
14411	14504	14586
14414	14505	14589
14415	14506	14590
14416	14507	14591
14418	14510	14592
14420	14511	14604
14422	14512	14605
14423	14513	14606
14424	14514	14607
14425	14516	14608
14427	14517	14609
14428	14519	14610
14432	14521	14611
14433	14522	14612
14435	14525	14613
14437	14526	14614
14441	14527	14615
14445	14530	14616
14450	14532	14617
14454	14533	14618
14456	14534	14619
14462	14536	14620
14463	14539	14621
14464	14541	14622
14466	14543	14623
14467	14544	14624
14468	14545	14625
14469	14546	14626
14470	14548	14627
14471	14549	14701
14472	14550	14706
14475	14551	14707
14476	14555	14708
14477	14556	14709
14478	14559	14710
14479	14560	14711
14480	14561	14712
14481	14564	14714
14482	14568	14715
14485	14569	14716
14486	14571	14717
14487	14572	14718

14719	14782	14846
14720	14783	14847
14721	14784	14850
14722	14787	14853
14723	14788	14855
14724	14801	14858
14726	14802	14859
14727	14803	14860
14728	14804	14861
14729	14805	14864
14731	14806	14865
14733	14807	14867
14735	14808	14869
14736	14809	14870
14737	14810	14871
14738	14812	14872
14739	14813	14873
14740	14814	14874
14741	14815	14877
14742	14816	14878
14743	14817	14879
14744	14818	14880
14747	14819	14881
14748	14820	14882
14750	14821	14883
14752	14822	14884
14753	14823	14885
14754	14824	14886
14755	14825	14889
14757	14826	14891
14760	14830	14892
14767	14836	14894
14769	14837	14895
14770	14838	14897
14772	14839	14898
14774	14840	14901
14775	14841	14903
14777	14842	14904
14779	14843	14905
14781	14845	

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.