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July 17, 2024

VIA ELECTRONIC DELIVERY

Secretary
Missouri Public Service Commission
200 Madison Street, PO Box 360
Jefferson City, MO 65102

General Counsel
Missouri Public Service Commission
PO Box 360
Jefferson City, MO 65102

Office of Public Counsel
PO Box 7800
Jefferson City, MO 65102

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

To the Missouri Public Service Commission:

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.

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
General Counsel
Go MD USA

Attachment

cc: Apollo Arcallana, President
Michael Campbell, Corporate Counsel
Go MD USA LLC

STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

In the Matter of the Application of

GO MD USA LLC

Application for Designation as an Eligible Telecommunications Carrier in the
State of Missouri for the Limited Purpose of Providing Lifeline Service to
Qualifying Customers

DOCKET NO.

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BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Petition of

GO MD USA LLC

**FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER
FOR THE LIMITED PURPOSE OF PROVIDING LIFELINE SERVICES TO
ELIGIBLE CONSUMERS**

DOCKET NO.

I. INTRODUCTION

GO MD USA LLC dba GO MD USA (“GO MD USA” or the “Company”), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”) ¹ and Sections 54.101 through 54.207² of the Rules of the Federal Communications Commission (“FCC”), ³ and the rules of the State of Missouri, including, CSR 4240-31.10-16, and 240-2-.060, hereby submits this Petition for Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of Missouri. The Company seeks ETC designation for the limited purpose of providing Lifeline service under the brand name “GO MD USA Mobile” to qualifying Missouri consumers

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R. §§ 54.101-54.207.

³ GO MD USA files this Petition in accordance with the rules adopted by the FCC in the 2012 Lifeline Reform Order. See Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training, WC Docket Nos. 11-42 and 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) (“2012 Lifeline Reform Order”).

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 Missouri only for the purpose of receiving and providing low-income consumers with Lifeline services and support in rural and non-rural areas. The Company does not make an application for ETC designation to offer services support 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 in Missouri. 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 Missouri residents as soon as possible. Accordingly, the Company respectfully requests that the Missouri Commission expeditiously approve this Petition.

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, or
markschirmer@gousa.net
(direct line) 901-230-4697

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

II. COMPANY OVERVIEW

GO MD USA LLC ("GO MD") is a South Dakota limited liability company with a principal address at 3385 Airways BLVD Suite 201, Memphis, TN 38116. It is owned 100% by LPHI Group. GO MD provides, among other things, resold wireless telecommunications services operating in Missouri and

other states, using the GO MD USA Mobile brand name and other brand names.

GO MD is a connectivity company headquartered in Tennessee that has served as a disruptive force in mobile telehealth technologies. In 2023, GO MD entered the retail wireless business by creating the GO MD USA Mobile brand through acquisition of the brand name 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 has been and will be competing in the retail wireless space at an approved provider in the Federal Communications Commission's Affordable Connectivity Program ("ACP").⁴ 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. This service includes plans bundling voice, text messaging, and mobile broadband services. 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. Pursuant to federal and applicable state regulations, 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 now seeks a limited purpose ETC designation in Missouri to (i) serve low-income Missouri customers, (ii) supplement the amount of support available to ACP customers when the program is re-authorized, and (iii) invite new and underserved customers to benefit from Lifeline and other federal support programs. GO MD's Lifeline-supported plans will be offered to prepaid customers under the GO MD USA Mobile brand, a recognized and trusted

⁴ 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.

provider in this market segment. GO MD 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 society and opportunities. GO MD's customers can choose from several affordable prepaid calling plans and handsets and have access to high-quality, responsive customer service. GO MD prepaid plans start as low as \$10 per month and can be refilled by contacting GO MD 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.⁵ 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 as an ETC. As demonstrated below, GO MD fulfills the requirements to be designated as an ETC in Missouri.

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 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 and 4 CSR 240-2-.060, 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

⁵ 47 U.S.C. § 214(e)(2).

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 1988⁶ and has no pending or recent federal or state enforcement actions. In addition, an applicant seeking designation as an ETC solely for the purpose of offering Lifeline service must: (1) certify that it will comply with the service requirements applicable to the support that it receives; (2) demonstrate its ability to remain functional in emergency situations; (3) demonstrate its ability to satisfy applicable consumer protection and service quality standards; and (4) demonstrate that it is financially and technically capable of providing Lifeline service. GO MD USA commits to complying with all reporting requirements established by the Commission.

Finally, prior to designating a carrier as an ETC,⁷ the Commission must determine whether such designation is in the public interest.⁸ 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.⁹

A. GO MD 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.¹⁰

⁶ 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).

⁷ 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.

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

⁹ 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).

¹⁰ 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

B. GO MD 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.¹¹

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

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

GO MD, 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.¹² GO MD provides mobile voice, text messaging, and broadband services to low-income consumers. The various Lifeline service plans that will be available to qualifying low-income Missouri 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 service plans are supported by AT&T and T-Mobile's networks. This will allow GO MD to immediately introduce new Lifeline options for Missouri consumers as soon as the Commission approves this Petition. At the same time, GO MD is building

U.S.C. §332 (c)(1)(A) (treating commercial mobile service providers as common carriers).

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

¹² See 47 C.F.R. § 8.1(b).

additional partner relationships in advanced nationwide 5G network services. The Company is expanding its broadband service nationwide. In areas of Missouri 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. Thus, there is no need for GO MD to obtain an approved FCC Compliance Plan in accordance with the 2012 Lifeline Reform Order.¹³

D. GO MD 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 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 Missouri, 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 Missouri coverage footprint by zip code is attached hereto as Exhibit 3. The Company certifies that it will provide 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.F. Section 54.2020(a).

¹³ See 2012 Lifeline Reform Order, ¶ 368.

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. 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 Will Comply with Service Requirements Applicable to the Support It Receives

Pursuant to 47 C.F.R. § 54.202(a)(1)(i), GO MD will comply with the service requirements applicable to the supported services it will be offering in the identified service areas. GO MD Mobile plans will be offered in Missouri initially by reselling AT&T and/or T-Mobile service, and in the future will also be supported by GO MD'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. GO MD USA does not intend to seek support from Missouri's USF pursuant to its provision of Lifeline Services.

G. GO MD 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 is in a unique position, however, because it is building a facilities-based 5G wireless network through partnerships with others, which covers the entire U.S. 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. The Company's 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'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 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. 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.

K. GO MD USA Is Financially and Technically Capable

As part of the 2012 Lifeline Reform Order,¹⁴ 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.¹⁵ GO MD USA satisfies these criteria.

GO MD USA is financially stable and capable of honoring its service obligations to customers as well as meeting its federal and state regulatory obligations.

The Company will not rely exclusively on revenues from the provision of Lifeline services for its operating revenues. The Company also has access to additional capital resources from its parent and affiliate companies. The Company's financial resources position the Company to expand its operations to serve currently unserved/underserved eligible low-income Missouri 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.

1. 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 Missouri. The Company further affirms that its Lifeline-supported voice

¹⁴ See 2012 Lifeline Reform Order, ¶ 387; see also 47 C.F.R. § 54.202(a)(4).

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.

M. GO MD USA Mobile's Offerings Will Comply with Lifeline Certification and Annual Re-certification Requirements

Customers interested in obtaining information on the Lifeline program will be directed to a toll-free telephone number and to the Company's website, which will contain information regarding the Company's Lifeline service plans, including a description of the Lifeline program and eligibility criteria. GO MD USA will use multiple outreach methods including but not limited to nonprofit partnerships, phone, online, and in person enrollments through Lifeline events.

Section 54.410 of the FCC rules requires ETCs to certify and verify a Lifeline customer's initial and continued eligibility. GO MD USA will rely on the National Verifier and the National Lifeline Accountability Database ("NLAD"), both administered by the Universal Service Administrative Company ("USAC"), to determine an applicant's eligibility for Lifeline service and ACP services 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).¹⁵ 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 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.

N. Prevention of Waste, Fraud and Abuse¹⁶

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

¹⁵ *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>).

¹⁶ 47 C.F.R. §§ 54.405(e), 54.410(f).

anyone else living at the prospective subscriber's residential address is currently receiving Lifeline service has received 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 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 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.

O. Commission Lifeline Requirements

GO MD will comply with Commission rules and orders applicable to wireless ETCs. As such, within 30 days of designation as an ETC and prior to

offering Lifeline service in Missouri, GO MD will submit the following information to the Commission: (1) Lifeline application form; (2) advertising and marketing materials that GO MD plans to use in Missouri; (3) rates, terms, and conditions of its Lifeline service offerings in Missouri; (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.¹⁷ GO MD 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 contact information on the ETC's website, marketing materials, applications, and terms and conditions and to advise that the Commission 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 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. GO MD WILL COMPLY WITH ALL COMMISSION REGULATIONS

GO MD also hereby asserts its willingness and ability to comply with all rules and regulations that the Commission chooses to impose lawfully upon the Company's provision of service contemplated by this Petition. GO MD USA further certifies that all federal funding received will be used for Lifeline support and will be used for the direct benefit of eligible low-income

¹⁷ 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).

consumers. GO MD USA is in good standing with the Commission and is in full compliance with all applicable Commission orders, rules, and regulations.

VI. 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 Missouri consumers suffer from the lack of affordable and available access. The Company has been 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 plans to deploy a new facilities-based wireless 5G network throughout the country over the next several years, designating GO MD 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

Authorizing the Company as a Lifeline ETC in the State of Missouri 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 Missouri 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 Missouri consumers will have the choice to apply their Lifeline discount to existing GO MD USA Mobile plans.

Further, granting GO MD's application will provide Missouri 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 Missouri 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."¹⁸ 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."¹⁹ In the Lifeline context, the entry of additional providers increases competitive choice for lower-income customers who may not be the focus of wireless carriers' marketing efforts. Launching GO MD USA Mobile Lifeline options in Missouri 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

¹⁸ *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).

¹⁹ *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).

effects upon the Oklahoma market for Lifeline services by making these services more available and accessible, thereby supporting the goals of universal service.

VII. 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.

VIII. CONCLUSION

Based on the foregoing, designation of GO MD USA as an ETC in the State of Missouri 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 Missouri for the purpose of participating in the Lifeline program.

Respectfully submitted,

Mark J. Schirmer
General Counsel
GO MD USA LLC
Markschirmer1@gmailcom
markschirmer@gomdusa.net
901-230-4697

July 17, 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 Missouri. I declare under penalty of perjury under the law of Missouri that the foregoing is true and correct.

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

A handwritten signature in black ink, appearing to read 'Arcallana', is written over a horizontal line.

Apollo Arcallana

EXHIBIT 2: PROPOSED LIFELINE PLANS

Subsidy Amount (\$)	Subsidy Type	GO MD USA Mobile Lifeline Plan Offering
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

Unlimited talk & text, 11 GB of data

EXHIBIT 3: MISSOURI COVERAGE AREA ZIP CODES

Zip code	Population				
63013	1,590	63384	1,732	63837	1,195
63015	2,139	63436	1,123	63845	5,178
63019	4,253	63437	1,351	63846	1,236
63023	4,788	63441	1,329	63848	1,317
63036	1,212	63448	1,478	63851	3,615
63037	3,051	63459	4,147	63852	1,374
63048	4,477	63461	5,882	63862	1,238
63055	2,694	63532	1,182	63869	3,203
63056	1,890	63546	1,484	63873	4,681
63060	2,048	63548	1,250	63876	2,060
63068	5,141	63549	2,403	63877	3,405
63071	1,167	63555	3,070	63932	1,126
63072	3,387	63559	1,106	63933	3,109
63089	6,229	63623	1,049	63937	2,774
63091	1,360	63624	3,493	63940	1,167
63101	3,497	63626	1,015	63944	1,044
63102	2,167	63627	2,786	63945	1,232
63127	5,423	63630	4,368	63960	2,895
63133	6,882	63648	1,325	63961	1,377
63332	1,419	63650	3,498	63966	2,366
63336	1,083	63653	1,105	63967	1,709
63339	1,029	63660	4,041	64011	3,468
63341	3,796	63662	1,024	64016	4,674
63343	4,347	63673	2,116	64019	2,361
63344	1,671	63730	3,073	64020	3,686
63347	3,085	63736	3,308	64037	6,292
63348	6,510	63740	5,511	64040	6,809
63349	1,825	63764	5,114	64048	4,273
63351	1,741	63766	1,177	64053	5,613
63352	1,002	63769	1,549	64054	3,824
63353	4,528	63771	3,137	64058	6,572
63357	6,496	63780	6,824	64061	3,268
63359	1,356	63781	1,058	64062	6,230
63361	4,265	63822	2,647	64067	5,469
63369	2,811	63823	1,104	64070	3,506
63377	2,891	63825	4,125	64077	1,547
63382	4,664	63830	6,048	64084	1,335
		63834	6,492	64088	1,345

64096	1,170	64755	2,926	65072	2,020
64097	1,158	64761	1,467	65074	3,112
64098	3,079	64762	1,622	65078	3,888
64105	6,761	64776	3,655	65079	4,475
64120	1,171	64779	2,511	65080	1,011
64125	2,102	64784	1,263	65082	1,164
64126	6,162	64788	1,355	65085	1,081
64136	2,195	64831	6,166	65211	1,320
64139	2,644	64835	2,008	65231	3,158
64145	5,916	64840	2,789	65236	1,259
64146	1,132	64841	1,160	65239	1,177
64150	3,976	64843	3,592	65243	2,673
64153	6,120	64844	4,465	65248	4,884
64163	1,301	64854	4,368	65254	1,769
64401	1,389	64855	2,984	65255	4,634
64439	1,617	64856	4,237	65256	2,081
64443	1,151	64859	1,349	65257	1,395
64444	1,284	64862	3,150	65259	2,655
64454	2,450	64863	1,746	65263	1,658
64463	1,342	64865	5,603	65274	1,667
64465	4,748	64866	1,329	65275	2,546
64469	2,112	64873	1,139	65276	1,556
64477	3,374	65010	6,857	65279	1,809
64490	2,078	65011	2,775	65284	2,345
64492	1,858	65014	2,058	65305	2,808
64633	4,792	65016	1,416	65323	1,082
64640	3,052	65017	1,451	65324	1,466
64644	3,042	65023	1,895	65326	1,959
64671	1,982	65032	1,737	65332	1,607
64720	3,909	65037	5,226	65336	6,042
64724	1,863	65039	2,489	65337	1,815
64725	2,316	65040	1,148	65338	3,112
64730	6,710	65041	5,536	65348	1,199
64733	1,089	65046	1,199	65349	2,437
64734	2,040	65047	1,436	65350	1,693
64739	1,105	65052	3,450	65351	2,502
64740	1,765	65053	1,409	65360	4,689
64742	2,248	65058	1,026	65438	2,700
64746	1,358	65059	1,026	65441	4,810
64747	3,812	65063	3,581	65452	2,845
64748	1,429	65066	6,480	65462	1,399

65470	1,028	65723	3,600	65453	8,464
65486	3,309	65724	1,351	65240	8,544
65550	2,992	65725	2,469	63107	8,546
65552	1,970	65734	3,278	65712	8,555
65556	5,418	65739	1,177	65622	8,636
65565	4,816	65740	3,539	63106	8,917
65590	1,569	65745	2,664	65619	8,951
65591	1,291	65753	4,874	64085	8,957
65604	3,673	65759	1,248	64034	9,007
65610	5,663	65764	1,354	63040	9,060
65611	2,183	65769	3,069	65559	9,102
65612	1,401	65770	2,981	64112	9,305
65617	1,538	65771	1,389	63144	9,411
65626	1,626	65786	2,241	63117	9,680
65631	5,957	65787	1,653	63362	9,710
65632	3,121	65789	1,867	63143	9,717
65633	3,871	65793	6,379	63103	9,779
65637	1,267	63038	6,893	64123	9,952
65641	1,221	65065	6,981	64076	9,972
65644	2,834	63389	7,058	64504	10,123
65646	1,901	65084	7,103	65043	10,165
65648	6,184	64158	7,178	65781	10,208
65649	2,025	65459	7,380	64106	10,240
65650	1,504	65049	7,535	64078	10,284
65652	4,262	64759	7,659	65584	10,412
65653	5,518	63120	7,740	64137	10,479
65656	4,969	63552	7,822	64834	10,554
65662	1,256	63935	7,875	63044	10,569
65663	2,491	65757	7,926	63012	10,725
65667	3,084	63016	7,967	64501	10,837
65669	2,471	63334	7,997	63113	11,044
65674	3,116	65737	8,013	63124	11,054
65679	2,477	63070	8,099	64109	11,183
65681	1,907	63147	8,099	65672	11,211
65685	1,085	63664	8,120	64108	11,241
65686	4,513	65018	8,192	65026	11,242
65705	3,840	64156	8,193	65355	11,249
65707	2,284	63703	8,224	63857	11,580
65710	1,124	65746	8,259	65809	11,617
65713	2,816	64129	8,339	64113	11,772
65722	1,745	63088	8,352	64429	11,782

65233	11,864	64024	16,086	64131	21,380
63645	11,929	63049	16,193	63401	21,635
63670	11,933	64110	16,362	65738	21,690
63077	11,978	64127	16,601	63139	21,759
64128	12,058	65706	16,731	64506	21,800
63390	12,093	63775	16,744	65251	22,151
65605	12,190	63601	16,785	63043	22,322
64503	12,359	65340	16,797	63108	22,637
64772	12,408	63628	16,838	63801	22,796
64124	12,621	63050	17,003	63141	22,854
65583	12,643	65270	17,396	64114	23,635
64075	12,675	64870	17,490	63090	23,698
63134	12,719	64116	17,522	65810	23,711
65708	12,800	65473	17,610	64157	23,755
65560	13,207	64056	17,710	63121	23,929
63841	13,254	63110	17,802	64836	24,306
64505	13,274	63131	17,861	63118	24,607
63080	13,289	63104	17,868	64138	24,673
64468	13,515	63112	17,980	65775	24,784
64057	13,619	65613	18,120	64086	24,796
64735	13,738	63025	18,145	64850	24,852
63132	13,841	63034	18,145	64083	24,942
65742	13,851	63137	18,228	63109	24,987
64089	13,993	64111	18,476	64030	26,015
64132	14,038	63138	18,567	64081	26,124
65020	14,094	63111	18,589	63028	27,994
64507	14,206	63042	18,737	64093	28,143
64080	14,273	63135	19,174	65616	28,201
63051	14,339	63005	19,245	63755	28,382
64154	14,433	63105	19,254	63367	28,385
64701	14,761	64082	19,455	63379	28,418
64117	14,880	63084	19,914	64155	28,445
63069	14,963	64064	19,931	64014	28,905
63115	15,173	63020	20,393	63128	29,092
63074	15,239	64130	20,509	63640	29,337
63126	15,440	64029	20,757	63052	29,431
65265	15,523	64063	20,930	65536	29,606
64079	15,532	64050	21,291	63146	29,626
63383	15,806	63501	21,296	64012	29,891
65806	15,807	64052	21,352	63130	29,922
64060	15,916	64134	21,375	64151	30,091

64152	30,364	64068	37,912	63368	46,687
65101	30,495	63011	38,499	63031	48,447
64119	31,207	65804	39,471	65802	48,518
65401	32,397	63701	39,716	63123	49,441
63125	32,684	63116	39,924	65202	50,016
64015	33,047	64804	39,924	65201	51,011
65721	33,778	65109	39,988	63301	52,399
63114	34,537	63122	40,731	63129	53,147
63119	34,608	65803	41,569	63366	53,154
63010	34,869	63017	42,277	65807	54,955
63901	34,918	63033	42,454	63021	55,491
64133	35,102	63304	42,770	63385	55,746
64801	35,196	63136	42,824	65203	60,616
65301	35,358	64118	44,043	63376	78,554
64055	36,740	63026	46,026		
65714	37,149	63303	46,156		

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