

GO MD USA LLC

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July 17, 2024

VIA ELECTRONIC DELIVERY

Filed Electronically
Linda C. Bridwell
Executive Director Public Service Commission
211 Sower Blvd. P. O. Box 615
Frankfort, KY 40601

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

Dear Ms. Bridwell:

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

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

<p>GO MD USA LLC</p> <p>Petition for Designation as Designation as an Eligible Telecommunications Carrier in the State of Kentucky a for the Limited Purpose of Providing Lifeline Service to Qualifying Customers</p>	<p>DOCKET NO. _____</p>
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**GO MD USA’S PETITION FOR DESIGNATION AS AN ELIGIBLE
COMMUNICATIONS CARRIER IN THE COMMONWEALTH OF KENTUCKY FOR
THE LIMITED PURPOSE OF PROVIDING LIFELINE SERVICE TO QUALIFYING
KENTUCKY RESIDENTS**

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**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

GO MD USA LLC’S ELECTRONIC PETITION FOR LIMITED DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER	DOCKET NO. _____
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I. INTRODUCTION

GO MD USA LLC dba GO MD USA (“GO MD USA” or the “Company”), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”)¹, and Sections 54.101 through 54.207² of the Rules of the Federal Communications Commission (“FCC”),³ and the Kentucky of the Public Service Commission’s (the “Commission”) rules and regulations, hereby submits this Petition for Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of Kentucky. The Company seeks ETC designation for the limited purpose of providing Lifeline service under the brand name “GO MD USA Mobile” to qualifying Kentucky 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 Kentucky only for the purpose of receiving and providing low-income consumers with Lifeline services and support in

¹ 47 U.S.C. § 214(e)(2); 47 C.F.R. § 54.205..

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”)

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 Kentucky. 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 Kentucky residents as soon as possible. Accordingly, the Company respectfully requests that the Kentucky 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
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markschirmer1@gmail.com
markschirmer@gomdusa.net

Upon receiving the requested designation as an ETC, the Company will provide the supported services through the requested designation service area and Offer Lifeline service to qualified low-income consumers. The Lifeline Services will, as with ACP services, be billed on a standalone and unbundled basis, independent of other connection or telephone services.

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 Kentucky 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. GO MD USA is 100% owned by LHPI Group LLC.

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 ("ACP").⁴ Under

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. 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.

the GO MD USA Mobile name, GO MD USA will use AT&T and T-Mobile wireless facilities to provide discounted mobile broadband service in all 50 states and the territories of D.C. and Puerto Rico, including plans bundling voice, text messaging, and mobile broadband services.⁵ Available GO MD USA Mobile branded plans include talk, text, and data at various data speeds under the ACP's monthly \$30 subsidy for eligible consumers. GO MD USA will 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, the "Non-Jurisdictional States"). GO MD USA seeks designation as a wireless ETC in Kentucky, will seek 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.

GO MD USA now seeks an ETC designation in Kentucky so that it can (i) serve low-income Kentucky 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 2023 and beyond society and opportunities. GO MD USA Mobile customers can choose from several affordable prepaid calling plans and handsets and have access to high-quality, responsive customer service. GO MD USA Mobile prepaid plans start as low as \$10 per month and can be refilled by contacting GO MD USA directly.

III. THE COMMISSION HAS JURISDICTION OVER DESIGNATION OF

⁵ See 47 C.F.R. § 54.1602(b) ("a bundle of broadband internet access service along with fixed or mobile voice telephony service, text messaging service, or both" is an EBB-eligible plan).

WIRELESS ETCs

Section 214(e)(2) of the Act provides state public utility commissions with the primary responsibility for the designation of ETCs.⁶ Under the Act, a state public utility commission, like the Commission, with jurisdictional authority over ETC designations must designate a common carrier as an ETC if the carrier satisfies the requirements of Section 214(e)(1). Therefore, the Commission has the authority to designate GO MD USA as an ETC. As demonstrated below, GO MD USA fulfills the requirements to be designated as an ETC in Kentucky.

IV. THE COMPANY MEETS THE REQUIREMENTS FOR ETC DESIGNATION

An application for ETC designation in Kentucky must meet federal statutory and regulatory requirements. As demonstrated below, GO MD USA meets the requirements for ETC designation by the FCC under 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 operators 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

⁶ 47 U.S.C. § 214(e)(2).

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 1988.⁷ 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.

Finally, prior to designating a carrier as an ETC,⁸ the Commission must determine whether such designation is in the public interest.⁹ 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.¹⁰

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

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

⁸ 47 CFR § 54.202(a). Section 54.202(a)(ii) requires carriers seeking ETC designation that is not limited to Lifeline service to submit a five-year plan that describes proposed improvements to the carrier's network throughout the proposed service area. Although GO MD USA is not seeking high-cost support in this Petition, it is expanding its network through partner relationships and contracts 5G network in accordance with certain FCC-approved deadlines.

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

¹⁰ 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 Red 17797 (2010).

214(e)(1) of the Act and Section 54.201(d) of the FCC’s rules.¹¹

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

Pursuant to Section 54.101(a) of the FCC’s rules, GO MD USA’ voice service provides the following:

- (1) voice grade access to the public switched network or its functional equivalent;
- (2) minutes of use for local service at no additional charge to end users;
- (3) access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier’s service area has implemented 911 or enhanced 911 systems; and (4) toll limitation services to qualifying low- income consumers.¹²

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

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

GO MD USA, through the GO MD USA Mobile brand, offers the supported services -- voice telephony service and broadband Internet access service, meeting the standards set in the FCC’s rules.¹⁴ GO MD USA provides 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 Kentucky residents are described in Exhibit 2.

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

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

¹³ See 47 C.F.R. § 8.1(b).

¹⁴ See 47 C.F.R. § 54.101(a).

In general, Section 214 requires ETCs to provide services using their facilities, at least in part. GO MD USA is in a unique position to increase wireless competition and serve low-income consumers. GO MD USA Mobile service plans are supported by AT&T and T-Mobile's networks. This will allow GO MD USA to immediately introduce new Lifeline options for Kentucky 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 launching 5G broadband service in over 80 cities (including Kentucky). In areas of Kentucky 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 Kentucky 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*.¹⁵

¹⁵ See *2012 Lifeline Reform Order*, ¶ 368.

D. 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 Kentucky, 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 Kentucky 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.R. § 54.2020(a).

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 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 Kentucky initially by reselling AT&T and/or T-Mobile service, and in the future will also be supported by GO MD USA's own 5G network facilities when feasible. These providers' networks are operational and largely built out. Thus, the Company will be able to commence offering its Lifeline service to all locations served by its underlying carriers very soon after receiving approval from the Commission.

G. 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. We are scheduled to deploy to most of the population of each Partial Economic Area by July 2025. 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. GO MD USA is fully compliant with all state and federal ACP requirements.

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 and 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 USA's partner 5G network operates in a cloud-native environment that is not encumbered by traditional technology and will be more flexible and resilient in the event of service outages. In addition, GO MD USA relies on mobile virtual network operator (MVNO) partner networks that are designed to remain functional even without external power sources, are able to re-route traffic around damaged facilities, and can manage traffic spikes that may occur in emergency situations.

GO MD USA LLC employs a cloud-native 5G network setup, distinguishing itself from legacy systems by leveraging cloud infrastructure instead of dedicated single servers. This shift

enables virtualization, allowing server resources to expand in real-time and eliminating the vulnerability of a single point of failure. By distributing core software across multiple resources rather than being confined to a single server, GO MD USA LLC ensures enhanced scalability and reliability in telecommunications. This approach optimizes resource usage and supports seamless scaling to meet varying demands, ensuring robust and uninterrupted 5G service delivery across diverse operational requirements.

J. 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*, 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.¹⁶ GO MD USA satisfies these criteria.

GO MD USA is financially stable and capable of honoring its service obligations to customers, as stated 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

¹⁶ 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 Kentucky 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.

L. 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 Kentucky. 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 agrees to offer additional minutes at a cost not to exceed \$0.05 per minute for Lifeline customers. GO MD USA 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).¹⁷ 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.

N. Prevention of Waste, Fraud and Abuse¹⁸

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

¹⁷ *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>).

¹⁸ 47 C.F.R. §§ 54.405(e), 54.410(f).

the application process, the National Verifier queries the NLAD for every enrollment to determine whether a prospective subscriber is currently receiving a Lifeline service or ACP Service from GO MD USA or any other ETC, and whether anyone else living at the prospective subscriber's residential address is currently receiving Lifeline service or ACP services.

Consistent with federal regulations, the Company will not seek USF reimbursement for new subscribers until they have activated the service, either by initiation and/or actual use of the service and will de-enroll any subscriber that has not used the Company's Lifeline service or ACP services as set forth in 47 C.F.R. § 54.407(c)(2). An account will be considered active if the authorized subscriber establishes usage, as "usage" is defined by 47 C.F.R. § 54.407(c)(2), during the specified timeframe, currently a period of thirty (30) days, or during the notice period set forth in 47 C.F.R. § 54.405(e)(3), currently a period of fifteen (15) days. In accordance with 47 C.F.R. § 54.405(e)(3), GO MD USA will provide the subscriber advance notice when a subscriber's failure to use the Lifeline service or ACP services within the notice period will result in service termination for non-usage. Customers that have been deactivated may participate in the Company's Lifeline service or ACP services in the future by reapplying and re-establishing eligibility.

To further protect the integrity of the USF, GO MD USA contracts with third party vendors to backstop USAC's own processes and procedures. First, the Company will use telgoo5.com software to process Lifeline applications and ACP applications. Among other things, Emerios uses third-party verification sources (currently the LexisNexis LEXID service) to validate a prospective customer's identity. Emerios also validates the Company's subsidy data to prevent duplicate subsidies. In addition, the Company has established a back-office real time review ("RTR") process to be completed before a Lifeline application is passed to the National

Verifier to qualify a customer. This process involves specially trained operations analysts (who have no financial stake in whether an application is successful) individually confirming the information entered into the application and supporting documentation to, among other things, confirm the identities of the sales agent and the customer by reviewing pictures of them in real time during the application process and review the customer's identification and address for anomalies. GO MD USA has hired experienced staff and a third-party company to provide RTR for our Lifeline enrollments. This third-party company has substantial experience running RTR for other Lifeline providers.

O. Commission's Lifeline Requirements

GO MD USA will comply with the Commission's rules and orders that are applicable to wireless ETCs. Specifically, GO MD USA will meet the reporting requirements and consumer safeguards set forth in the Commission Lifeline Requirements. As such, within 30 days of designation as an ETC and prior to offering Lifeline service in Kentucky, 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 Kentucky; (3) rates, terms, and conditions of its Lifeline service offerings in Kentucky; (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.¹⁹ 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

¹⁹ 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).

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 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. GO MD USA WILL COMPLY WITH ALL REGULATIONS ADOPTED BY THE COMMISSION

GO MD USA 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 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 Kentucky 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 Kentucky 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 Kentucky 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 Kentucky 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 Kentucky 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 Kentucky 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.”²⁰ 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.”²¹ 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 Kentucky 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 Kentucky 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 Kentucky 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 Kentucky for the purpose of participating in the Lifeline program.

²⁰ *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).

²¹ *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).

Respectfully submitted,

Mark J. Schirmer
General Counsel
GO MD USA LLC
markschirmer1@gmail.com
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 Kentucky. I declare under penalty of perjury under the law of Kentucky that the foregoing is true and correct.

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



Apollo Arcallana

EXHIBIT 2: PROPOSED LIFELINE PLANS

<u>Subsidy Amount</u> (\$)	<u>Subsidy Type</u>	<u>GO MD USA Mobile Lifeline Plan Offering</u>
9.25	Lifeline (Federal)	1,000 minutes of talk/voice, 1,000 text, and 4.5 GB of data
34.25	Lifeline (Federal and Tribal)	Unlimited talk & text, 11 GB of data

**EXHIBIT 3: KENTUCKY COVERAGE AREA ZIP
CODES**

	40069	40202
40003	40070	40203
40004	40071	40204
40006	40075	40205
40007	40076	40206
40008	40077	40207
40009	40078	40208
40010	40104	40209
40011	40107	40210
40012	40108	40211
40013	40109	40212
40014	40110	40213
40019	40111	40214
40022	40115	40215
40023	40117	40216
40026	40118	40217
40031	40119	40218
40033	40121	40219
40036	40140	40220
40037	40142	40222
40040	40143	40223
40041	40144	40228
40045	40145	40229
40046	40146	40241
40047	40150	40242
40049	40152	40243
40050	40155	40245
40051	40157	40258
40052	40160	40272
40055	40161	40291
40056	40162	40292
40057	40165	40299
40059	40170	40310
40060	40171	40311
40062	40175	40312
40065	40176	40313
40067	40177	40316
40068	40178	40322

40324	40456	40813
40328	40460	40815
40330	40461	40818
40336	40464	40819
40337	40468	40820
40342	40472	40823
40346	40475	40824
40347	40481	40826
40348	40484	40827
40350	40486	40828
40351	40489	40829
40353	40502	40830
40355	40503	40831
40356	40504	40840
40358	40505	40843
40359	40507	40845
40360	40508	40854
40361	40509	40855
40363	40510	40856
40370	40511	40858
40371	40513	40862
40372	40514	40863
40374	40515	40865
40376	40516	40868
40379	40517	40870
40380	40526	40873
40383	40601	40874
40385	40701	40902
40387	40729	40903
40390	40734	40906
40391	40737	40913
40402	40740	40914
40403	40741	40915
40409	40744	40921
40419	40759	40923
40422	40763	40927
40437	40769	40935
40440	40771	40939
40442	40806	40940
40444	40807	40943
40445	40808	40949
40447	40810	40953

40958	41055	41179
40962	41056	41180
40965	41059	41183
40972	41063	41189
40977	41064	41203
40982	41071	41204
40983	41073	41214
40988	41074	41216
40995	41075	41219
40997	41076	41222
41001	41080	41224
41002	41083	41226
41003	41085	41230
41004	41086	41231
41005	41091	41232
41006	41092	41234
41007	41093	41238
41008	41094	41240
41010	41095	41250
41011	41097	41254
41014	41098	41255
41015	41101	41256
41016	41102	41257
41017	41121	41260
41018	41124	41262
41030	41129	41263
41031	41132	41264
41033	41135	41265
41034	41139	41267
41035	41141	41268
41039	41143	41271
41040	41144	41274
41041	41146	41301
41042	41149	41311
41043	41159	41314
41044	41164	41317
41045	41166	41332
41046	41168	41339
41048	41169	41348
41049	41171	41352
41051	41174	41360
41052	41175	41364

41365	41567	41722
41366	41568	41723
41367	41571	41725
41385	41572	41727
41397	41601	41729
41408	41602	41731
41421	41603	41735
41425	41604	41740
41464	41605	41745
41465	41606	41746
41472	41607	41749
41501	41612	41751
41503	41615	41754
41512	41616	41759
41513	41619	41760
41514	41621	41763
41519	41622	41764
41522	41630	41766
41524	41631	41772
41527	41632	41773
41528	41635	41774
41531	41636	41775
41534	41640	41776
41535	41642	41777
41537	41645	41804
41539	41647	41812
41540	41649	41815
41543	41650	41817
41544	41651	41819
41547	41653	41821
41548	41655	41822
41553	41659	41824
41554	41660	41825
41555	41663	41826
41557	41666	41828
41558	41667	41831
41559	41669	41832
41560	41701	41833
41562	41712	41834
41563	41714	41835
41564	41719	41836
41566	41721	41837

41838	42058	42207
41839	42064	42210
41840	42066	42211
41843	42069	42214
41844	42071	42215
41845	42076	42217
41847	42078	42220
41849	42079	42223
41855	42081	42232
41858	42082	42234
41859	42083	42236
41861	42085	42240
41862	42086	42252
42001	42087	42254
42003	42088	42256
42020	42101	42259
42021	42103	42261
42023	42104	42262
42024	42120	42265
42025	42122	42266
42027	42123	42273
42028	42127	42274
42029	42129	42275
42031	42130	42276
42032	42133	42280
42035	42134	42285
42036	42140	42286
42038	42141	42301
42039	42151	42303
42040	42154	42320
42041	42156	42321
42044	42157	42323
42045	42159	42324
42047	42160	42325
42048	42164	42326
42049	42166	42327
42050	42167	42328
42051	42170	42330
42053	42171	42333
42054	42202	42337
42055	42204	42338
42056	42206	42339

42343	42445	42649
42344	42450	42653
42345	42451	42701
42347	42452	42712
42348	42453	42713
42349	42455	42715
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42355	42462	42722
42361	42464	42724
42366	42501	42726
42367	42503	42728
42368	42516	42729
42369	42518	42732
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42372	42528	42740
42376	42533	42741
42378	42539	42743
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42408	42553	42749
42409	42565	42753
42410	42566	42754
42411	42567	42757
42413	42602	42762
42420	42603	42764
42431	42629	42765
42436	42633	42776
42437	42634	42782
42440	42635	42784
42441	42642	42788
42442	42647	

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

G 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.