BEFORE THE STATE OF GEORGIA
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

GO MD USA LLC Petition for Designation as an Eligible Telecommunications Carrier in THE STATE OF GEORGIA for the Limited Purpose of Providing Lifeline Service to Qualifying Customers	)	D.T.C. Docket No. _____

PETITION OF GO MD USA LLC FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER IN THE STATE OF GEORGIA FOR THE LIMITED PURPOSE OF OFFERING LIFELINE SERVICE TO QUALIFIED HOUSEHOLDS

Apollo Arcallana
Manager
GO MD USA LLC
3385 Airways Blvd STE 201
Memphis TN, 38116
(888) 818-9220
LHPIGROUP@Icloud.com

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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 54.207[2] of the Rules of the Federal Communications Commission ("FCC"),[3] and the rules of the GEORGIA Department of Telecommunications and Cable (the "Department"), including the filing requirements for Lifeline service providers,[4] hereby submits this Petition for Designation as an Eligible Telecommunications Carrier ("ETC") in THE STATE OF GEORGIA. The Company seeks ETC designation for the limited purpose of providing Lifeline service under the brand

[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*").

name “GO MD USA Mobile” to qualifying GEORGIA consumers subject to the service areas served by the Company’s underlying wireless carriers, AT&T and T-Mobile.

As demonstrated herein, and as certified in Exhibit 1 to this Petition, the Company meets all the federal and Commonwealth statutory and regulatory requirements for designation as an ETC in GEORGIA. 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 GEORGIA residents as soon as possible. Accordingly, the Company respectfully requests that the GEORGIA Department expeditiously approve this Petition.

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

Apollo Arcallana
Manager
GO MD USA LLC
201 Airways Blvd STE 201
Memphis TN, 38116
(88) 818-9220
LHPIGROUP@Icloud.com

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 LLC provides, among other things, resold wireless telecommunications services operating in GEORGIA and other states, using the GO MD USA Mobile brand name and other brand names.

GO MD USA’ parent company, GO MD USA LLC (“GO MD USA”), is a connectivity company headquartered in Tennesse that has served as a disruptive force in mobile teleheath technologies. In 2023, GO MD USA entered the retail wireless business by creating GO MD USA Mobile brand and in 2023, acquiring the GO MD USA Mobile brand as well as other brands and customer assets. Now, using its subcontracted licensed wireless spectrum assets, GO MD USA is

building the nation's first virtualized, cloud-native, Open Mobile Telehealth Mobile Network-based 5G broadband network. To facilitate the buildout, GO MD USA will be entering into multi-year agreements with multiple partners. Because GO MD USA is actively sub-contracting wireless facilities around the country, it is well positioned to identify opportunities to target build-outs in under-served areas.

Even as the 5G network partner relationship are expanding, GO MD USA will be competing in the retail wireless space and is in the process of seeking to be an approved provider in the Federal Communications Commission's Affordable Connectivity Program ("ACP").

Under the GO MD USA Mobile, 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 Washington 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 be submitting an application for ETC designation pending 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 will be seeking designated as a wireless ETC in GEORGIA and other 46 state, and will seeking authorition by the California Public Utilities Commission to provide California LifeLine service, and plans to file for ETC status in other states over time.

GO MD USA now seeks an ETC designation in GEORGIA so that it can (i) serve low-income GEORGIA customers, (ii) supplement the amount of support available to

[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).

ACP customers and (iii) invite new, underserved customers to benefit from Lifeline and other federal support programs. GO MD USA' 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 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 GEORGIA.

IV. THE COMPANY MEETS THE REQUIREMENTS FOR ETC DESIGNATION

A application for ETC designation in GEORGIA must meet specific federal statutory and regulatory requirements. As demonstrated below, GO MD USA meets the requirements for ETC designation by the FCC pursuant to Section 214(e)(2) of the Communications Act. These

[6] 47 U.S.C. § 214(e)(2).

include: (1) a certification that the applicant offers or intends to offer all services designated for support by the FCC pursuant to section 254(c) of the Communications Act; (2) a certification that the applicant offers or intends to offer the supported services on a common carrier basis either using its own facilities or a combination of its own facilities and/or resale of another carrier's services; (3) a description of how the applicant advertises the availability of the supported services and the charges therefor using media of general distribution; (4) a detailed description of the geographic service area for which the applicant requests to be designated as an ETC; and (5) a certification that neither the applicant, nor any party to the application, is subject to a denial of federal benefits pursuant to the Anti-Drug Abuse Act of 1988.[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.

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

[9] When making a public interest determination,

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[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 .

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

A. the Commission considers the benefits of increased consumer choice and the unique advantages and disadvantages of the applicant's service offerings.[10]**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.[11] Accordingly, 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.

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]

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[10] *See, e.g., Virgin Mobile ETC Designation Order in the States of GEORGIA, Connecticut, Delaware, New Hampshire and the District of Columbia*, WC Docket 09-197, Order, 25 FCC Rcd 17797, 17799, ¶ 6 (WCB 2010).

[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).

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 will be providing and will provide mobile voice, text messaging, and broadband services to low-income consumers. The various Lifeline service plans that will be available to qualifying low-income GEORGIA 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-incomer consumers. GO MD USA Mobile service plans are will be supported by AT&T and T-Mobile's networks. This will allow GO MD USA to immediately introduce new Lifeline options for GEORGIA consumers as soon as the Department approves this Petition. At the same time, GO MD USA is building additional partner relationship in advanced nationwide 5G network serives. The Company will be launching 5G broadband service in over 80 cities (including in GEORGIA) [5] In areas of GEORGIA where service on GO MD USA' 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.

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[14] *See* 47 C.F.R. § 54.101(a).

Because GO MD USA is deploying facilities-based wireless

D. voice and broadband services in GEORGIA 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*.[16]**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 plans to offers ACP service – this includes the entire geographic boundary of THE STATE OF GEORGIA subject to coverage limits of underlying carriers and GO MD USA' 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 to allow the Company to provide Lifeline service wherever its underlying, facilities-based providers have wireless coverage. The current GEORGIA coverage footprint by zip code is attached hereto as Exhibit 3.

E. **The Company 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.

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[16] *See 2012 Lifeline Reform Order*, ¶ 368.

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 Department rules. Samples of the Company's Lifeline advertising are attached hereto as Exhibit 4.

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 GEORGIA 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 Department.

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 buidling its own facilities-based 5G wireless network through partnerships we are in the process of deploying its 5G broadband service to 40% of the U.S. population on September 1, 2023 and scheduled to deploy 70% of the U.S. population by December 15, 2023 and (using certain low-band spectrum) to 85% of the population of each Partial Economic Area by July 1, 2024. GO MD USA commits to providing service consistent with the requirements of any other support mechanism pursuant to which it is authorized to receive support in the future.

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.

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' 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.

J. GO MD USA Is Financially and Technically Capable

As part of the *2012 Lifeline Reform Order*, the FCC amended its rules to require a carrier seeking designation as a Lifeline-only ETC to demonstrate that it is financially and technically capable of providing the supported Lifeline service in compliance with all of the low-income program rules.[17] GO MD USA satisfies these criteria.

GO MD USA is financially stable and capable of honoring its service obligations to customers, as shown in Exhibit 5, as well as meeting its federal and state regulatory obligations.

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

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 GEORGIA 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 to the low-income consumer sector.

K. Terms and Conditions of Proposed Lifeline Offering

The Company has the ability to provide all services supported by the universal service program, as detailed in 47 C.F.R. § 54.101(a), throughout GEORGIA. 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.

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. In addition to wholly-supported or discounted wireless services, prepaid Lifeline customers will be able to receive an upgraded handset at an additional charge or SIM card offer, as well as access to voice mail, caller I.D., call forwarding, 3-way calling, and call waiting features at no additional charge. Customers may use their minutes to place domestic long-distance calls at no additional charge, and calls to the Company's customer service are free with no deduction of available minutes. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes.

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

Customers interested in obtaining information on the Lifeline program will be directed to a toll-free telephone number and to the Company's website, which will contain information regarding the Company's Lifeline service plans, including a description of the Lifeline program and eligibility criteria. GO MD USA will use multiple outreach methods including but not limited to nonprofit partnerships, phone, online, and in person enrollments through Lifeline events. Section 54.410 of the FCC's 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. 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).[18]For applicants verified as being eligible by USAC's National Verifier and NLAD, GO MD USA will complete enrollment by transmitting the required information into NLAD as required by Section 54.404(b)(6) of the FCC's rules. In addition, at the time of enrollment, the Company will notify the applicant that the prepaid service must be personally activated by the subscriber and the subscriber must use their service every thirty (30) days in order to maintain their Lifeline benefit and ACP benefits.

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

M. [19]**Prevention of Waste, Fraud and Abuse**

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

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[18] *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).[19] 47 C.F.R. §§ 54.405(e), 54.410(f).

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 . (telgoo5.com) software to process Lifeline applications and ACP applications. Among other things, Emerios uses third-party verification sources (currently the Lexis Nexis LEXID service) to validate a prospective customer's identity. Emerios also validates the Company's subsidy data to prevent duplicate subsidies. In addition, the Company has established a back- office real time review ("RTR") process to be completed before a Lifeline application is passed to the National Verifier to qualify a customer. This process involves specially trained operations analysts (who have no financial stake in whether an application is successful) individually confirming the information entered into the application and supporting

documentation to, among other things, confirm the identities of the sales agent and the customer by reviewing pictures of them in real time during the application process and review the customer's identification and address for anomalies. GO MD USA has hired experienced staff and a third party company to provide RTR for our Lifeline enrollments. This third party company has substantial experience running RTR for other Lifeline providers.

N. **Department Lifeline Requirements**

GO MD USA represents that it will comply with the Department'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 Department Lifeline Requirements. As such, within 60 days of designation as an ETC and prior to offering Lifeline service in GEORGIA, GO MD USA will submit the following information to the Department: (1) Lifeline application form; (2) advertising and marketing materials that GO MD USA plans to use in GEORGIA; (3) rates, terms, and conditions of its Lifeline service offerings in GEORGIA; (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.[20] GO MD USA will comply with the Department Lifeline Requirements regarding consumer safeguards, including working with the Department staff to resolve Lifeline subscriber disputes, providing 60 days' notice to subscribers and the Department of a planned discontinuance of Lifeline service, and working with the Department to facilitate a smooth transition of subscribers to an alternative ETC in the event of a discontinuance of service. The Department Lifeline Requirements direct wireless ETCs to include the Department's Consumer

[20] 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).

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 Department. [21]GO MD USA also will submit the reports identified in the Department Lifeline Requirements that are due annually by March 1 (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 Department Lifeline Requirements, will provide copies of final USAC audit reports, and provide 5-business day prior notice of material changes to rates, terms of conditions of Lifeline service.

V. DESIGNATING GO MD USA AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST

The Department 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 GEORGIA 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 is planing deploying a new facilities-based wireless 5G network throughout the country over the next several years, designating GO MD USA as an

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National Verifier).

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 GEORGIA 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 always have the ability to 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 GEORGIA 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 GEORGIA consumers will have the choice to apply their Lifeline discount to existing GO MD USA Mobile plans.

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."[22] 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."[23] 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 GEORGIA 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 GEORGIA market for Lifeline services by making these services more available and accessible, thereby supporting the goals of universal service.

VI. ANTI-DRUG ABUSE CERTIFICATION

In accordance with section 5301 of the Anti-Drug Abuse Act of 1988, GO MD USA certifies that no party to the Petition is subject to denial of federal benefits, including FCC benefits.

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[22] *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).

[23] *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).

VII. **CONCLUSION**

Based on the foregoing, designation of GO MD USA as an ETC in THE STATE OF GEORGIA 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 Department designate GO MD USA as an ETC in THE STATE OF GEORGIA for the purpose of participating in the Lifeline program.

Respectfully submitted,

Apollo Arcallan
GO MD USA LLC
Manager

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 Petition for Designation as an Eligible Telecommunications Carrier in THE STATE OF GEORGIA. The statements in the foregoing document are true of my own knowledge, except as to matters which are herein stated on information and belief, and as to those matters, I believe them to be true.

GO MD USA Mobile & GO MD USA LLC

Apollo Arcallana

Apollo Arcallana
Manager
03/19/2023

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

EXHIBIT 3: GEORGIA COVERAGE AREA ZIP CODES

1	30044	99,613
2	30043	88,458
3	30024	83,818
4	30349	80,047
5	30040	75,151
6	30127	73,312
7	30052	73,299
8	30041	72,535
9	30281	71,047
10	30096	68,709
11	30047	67,842
12	30135	66,599
13	30004	66,315
14	30022	65,433
15	30188	64,836
16	30062	63,418
17	30331	63,330
18	30058	62,716
19	30101	62,337
20	30906	61,719
21	30083	61,522
22	31907	61,085
23	30253	59,328
24	30263	59,163
25	30144	58,952
26	30066	58,846
27	30318	58,839
28	30016	57,834

29	31088	56,997
30	31419	56,947
31	30114	56,623
32	30518	55,708
33	30075	55,529
34	30519	55,350
35	30080	53,270
36	30721	53,180
37	30093	52,048
38	30809	51,985
39	30236	51,544
40	30157	49,757
41	30115	49,719
42	30064	49,178
43	30228	48,687
44	30039	48,485
45	30458	48,031
46	30252	47,886
47	30907	47,655
48	30606	47,448
49	30019	47,152
50	30076	47,070
51	30680	46,657
52	30132	46,387
53	30097	45,646
54	30067	45,584
55	30045	45,465
56	30506	45,327
57	30813	45,178
58	30032	45,107
59	30134	44,552

60	30034	44,450
61	30102	44,289
62	30152	43,972
63	30213	43,651
64	30736	43,284
65	30319	43,244
66	30126	43,134
67	30909	42,498
68	30605	42,473
69	30815	42,342
70	31313	41,967
71	30238	41,966
72	31061	41,678
73	30701	41,355
74	30165	41,330
75	30078	41,311
76	30120	41,212
77	30294	41,037
78	30038	40,902
79	30189	40,471
80	30005	40,309
81	31909	40,062
82	30180	39,825
83	30046	39,763
84	30014	39,551
85	30060	39,490
86	30269	38,881
87	30084	38,784
88	30338	38,553
89	31405	38,145
90	30087	37,933

91	30215	37,826
92	30350	37,635
93	30328	37,279
94	30542	37,193
95	30092	36,526
96	30117	36,311
97	30223	36,119
98	30265	35,940
99	31602	35,837
100	30344	35,380
101	30315	35,324
102	30008	35,023
103	31904	34,865
104	30316	34,810
105	31406	34,676
106	30161	34,529
107	30094	34,248
108	31210	34,106
109	30068	33,554
110	31404	33,495
111	30705	33,347
112	30311	33,334
113	30339	33,230
114	30274	33,218
115	30012	33,140
116	30341	33,131
117	30342	32,480
118	30028	32,232
119	31324	31,978
120	31601	31,972
121	30030	31,856

122	30214	31,396
123	31705	31,241
124	30033	31,144
125	30501	31,121
126	30240	31,025
127	30088	30,762
128	30248	30,756
129	31204	30,715
130	30340	30,345
131	30324	30,128
132	30507	30,009
133	31525	29,792
134	30534	29,695
135	30549	29,191
136	30741	28,639
137	30297	28,629
138	30224	28,445
139	30260	28,395
140	31794	28,009
141	31763	27,998
142	31021	27,821
143	30309	27,469
144	30296	27,457
145	31206	27,238
146	30904	27,125
147	30533	26,983
148	30310	26,979
149	30655	26,925
150	30329	26,891
151	30720	26,725
152	30504	26,638

153	31093	26,498
154	31322	26,399
155	30305	26,398
156	30082	26,161
157	30021	25,987
158	30122	25,716
159	30233	25,676
160	30071	25,602
161	30013	25,205
162	30121	25,199
163	30345	24,823
164	30017	24,782
165	30306	24,769
166	30168	24,737
167	30143	24,681
168	31410	24,151
169	30528	24,001
170	30314	23,987
171	30116	23,951
172	30241	23,909
173	31707	23,900
174	30286	23,848
175	31605	23,839
176	30312	23,801
177	30291	23,693
178	30141	23,573
179	30106	23,401
180	30125	23,384
181	30601	23,186
182	31312	23,175
183	30548	23,006

184	30327	22,932
185	31069	22,927
186	31792	22,915
187	30308	22,802
188	30035	22,793
189	30512	22,733
190	31548	22,717
191	31503	22,421
192	31326	22,290
193	30277	22,142
194	30577	22,052
195	31768	22,024
196	31520	21,864
197	31558	21,725
198	31008	20,955
199	31005	20,791
200	31407	20,750
201	31906	20,722
202	30307	20,712
203	31024	20,644
204	30677	20,229
205	31721	20,094
206	30009	19,922
207	31401	19,833
208	30540	19,621
209	31903	19,587
210	31015	19,401
211	30728	19,283
212	31750	18,415
213	30011	18,377
214	30179	18,370

215	31701	18,105
216	30276	17,887
217	30153	17,836
218	31216	17,533
219	30273	17,522
220	30656	17,510
221	31030	17,461
222	31522	17,250
223	30901	17,143
224	30824	17,006
225	30707	16,986
226	30474	16,983
227	31905	16,973
228	31217	16,950
229	31533	16,810
230	31709	16,631
231	30461	16,617
232	31029	16,524
233	31047	16,375
234	30107	16,089
235	30360	15,866
236	30517	15,825
237	31513	15,723
238	30643	15,634
239	31516	15,477
240	31545	15,445
241	31220	15,393
242	30354	15,323
243	30635	15,223
244	39828	15,148
245	31032	15,141

246	31211	15,008
247	30830	14,934
248	31539	14,543
249	30747	14,496
250	30103	14,387
251	30110	14,386
252	31501	14,258
252	30317	14,258
254	31523	14,182
255	31023	14,153
256	30204	13,931
257	31632	13,896
258	30401	13,693
259	30642	13,601
260	30650	13,484
261	30620	13,262
262	31014	12,784
263	30523	12,562
264	30337	12,559
265	31820	12,477
266	31316	12,363
266	30513	12,363
268	39819	12,296
269	30054	12,294
270	31535	12,185
271	30529	12,009
272	31415	11,935
273	30313	11,894
274	30467	11,780
275	30622	11,684
276	30436	11,672

277	31757	11,498
278	31791	11,434
279	31408	11,336
280	31620	11,236
281	30814	11,201
282	30417	11,105
283	39817	11,035
284	30531	10,996
285	30268	10,942
286	30025	10,811
287	30755	10,775
288	30607	10,769
289	30439	10,524
290	31639	10,523
291	31036	10,348
292	30427	10,332
293	31082	10,255
294	31027	10,202
295	31636	10,121
296	31537	9,996
297	31788	9,940
298	30453	9,807
299	30666	9,748
300	30230	9,742
301	30288	9,588
302	31779	9,575
303	31064	9,550
304	30536	9,505
305	31052	9,462
306	31643	9,433
307	31510	9,344

308	31329	9,313
309	31793	9,267
310	30217	9,262
311	31411	9,085
312	30510	9,025
313	31087	8,922
314	30752	8,885
315	30290	8,876
316	31546	8,870
317	30145	8,752
318	31320	8,710
319	39823	8,624
320	30442	8,595
321	30566	8,590
322	30753	8,560
323	30535	8,416
324	31808	8,406
325	31308	8,394
326	30662	8,371
327	30740	8,238
328	30554	8,227
329	30633	8,213
330	39845	8,165
331	31730	8,103
332	31302	8,084
333	31719	8,060
334	30553	8,019
335	31315	7,952
336	30905	7,933
337	31321	7,859
338	30530	7,831

339	31771	7,744
340	30546	7,720
341	30683	7,702
342	30176	7,686
343	39842	7,659
344	31554	7,641
345	30108	7,611
346	30525	7,556
347	30742	7,539
348	30187	7,529
349	30817	7,389
350	31096	7,353
351	31201	7,240
352	30735	7,220
353	30326	7,207
354	31635	7,133
355	30710	7,106
356	30646	7,092
357	30739	7,031
358	30184	6,875
359	31833	6,872
360	30173	6,825
361	30628	6,707
362	30673	6,661
363	30802	6,568
364	31031	6,488
365	30183	6,480
366	30563	6,438
367	31774	6,309
368	31804	6,266
369	39837	6,171

370	31028	6,170
371	31055	6,118
372	30543	6,107
373	30303	6,106
374	31811	6,028
375	30002	6,025
376	31714	6,021
377	30292	6,002
378	31331	5,963
379	31822	5,899
380	31901	5,728
381	30415	5,716
382	30621	5,571
383	30175	5,523
384	31569	5,469
385	31092	5,430
386	30520	5,367
387	31634	5,277
388	30434	5,241
389	30113	5,235
390	30629	5,228
391	30222	5,214
392	30521	5,183
392	31305	5,183
394	30104	5,082
395	30220	5,025
396	30457	5,007
397	30582	5,001
398	30147	5,000
399	31068	4,990
400	31816	4,956

401	30558	4,951
402	30295	4,886
403	31553	4,777
404	31642	4,721
405	30346	4,711
406	31063	4,707
407	31803	4,681
408	30557	4,652
409	39827	4,651
410	39840	4,633
411	30139	4,620
412	30725	4,588
413	31773	4,583
414	31645	4,534
415	31006	4,527
416	30471	4,515
417	30559	4,507
418	31001	4,501
419	31806	4,462
420	30564	4,447
421	30808	4,427
422	31543	4,326
423	31089	4,238
424	30560	4,230
425	31091	4,185
426	31566	4,184
427	30750	4,173
428	30079	4,042
429	30257	4,007
430	30565	3,959
431	30833	3,942

432	30527	3,936
433	30609	3,933
434	31301	3,915
435	30624	3,878
436	30055	3,857
437	30185	3,836
438	30428	3,818
439	30411	3,816
440	30363	3,783
441	31831	3,751
442	30828	3,739
443	30259	3,731
444	31098	3,721
445	30738	3,712
446	30567	3,691
447	30178	3,654
448	31519	3,640
449	31557	3,637
450	39897	3,612
451	31606	3,575
452	30206	3,573
453	30711	3,547
454	31815	3,515
455	31328	3,483
456	31650	3,473
457	30182	3,472
458	30445	3,471
459	30538	3,434
460	31647	3,405
461	31046	3,365
462	31002	3,332

463	30205	3,329
464	30511	3,316
465	31626	3,266
466	30571	3,227
467	30576	3,189
468	30669	3,149
469	31744	3,078
470	30663	3,066
471	31775	3,046
472	30734	3,042
473	31078	3,034
474	30170	3,016
475	31037	3,008
476	30124	2,970
477	30648	2,939
478	31637	2,916
479	31019	2,899
480	30547	2,889
481	31044	2,878
482	30258	2,873
483	30477	2,843
484	31801	2,829
485	31555	2,786
486	31018	2,785
487	31716	2,757
488	30421	2,750
489	31076	2,736
490	31560	2,733
491	30332	2,708
492	31075	2,702
493	30516	2,688

494	30555	2,676
495	30473	2,674
496	31079	2,627
497	30630	2,613
498	31778	2,612
499	30256	2,607
500	30322	2,605
501	30171	2,603
502	31542	2,592
503	31012	2,590
504	30627	2,577
505	31033	2,531
506	31830	2,523
507	31765	2,516
508	31825	2,512
509	31303	2,501
510	31562	2,463
511	30733	2,451
512	31749	2,446
513	39854	2,392
514	30056	2,358
515	30731	2,323
516	31790	2,318
517	31565	2,301
518	31549	2,287
519	30668	2,255
520	31805	2,223
521	30625	2,209
522	39834	2,207
523	30805	2,204
524	30105	2,158

525	30137	2,137
526	39866	2,125
527	31827	2,114
528	30810	2,096
529	31781	2,094
530	31780	2,092
531	30251	2,046
532	30575	2,039
533	30293	2,032
534	31738	2,031
535	30149	2,021
536	30450	2,018
537	31807	2,000
538	31016	1,998
539	30216	1,997
540	30757	1,964
541	31826	1,962
542	30568	1,948
543	30456	1,936
544	31512	1,931
545	30420	1,921
546	30441	1,843
547	39813	1,841
548	30730	1,822
549	31022	1,808
550	39870	1,801
551	39851	1,800
552	30816	1,783
553	31060	1,777
554	31764	1,743
555	31314	1,740

556	39825	1,733
557	31049	1,731
557	31641	1,731
559	31207	1,728
560	30634	1,713
561	39846	1,686
562	30234	1,668
563	31622	1,667
564	30446	1,657
565	30631	1,645
566	31058	1,633
567	30602	1,613
568	31795	1,610
569	30641	1,602
570	30552	1,600
571	39815	1,599
572	31009	1,582
573	31017	1,576
574	31065	1,573
575	31323	1,562
576	30410	1,537
577	31547	1,534
578	39886	1,525
579	31712	1,515
580	31783	1,512
581	31563	1,508
582	31057	1,495
583	30413	1,489
584	30452	1,488
585	31829	1,467
586	31097	1,437

586	31042	1,437
588	31307	1,432
589	30218	1,406
590	30177	1,393
591	30619	1,392
592	31054	1,384
593	30541	1,383
594	31020	1,362
595	31624	1,342
596	31789	1,337
597	30425	1,324
598	31756	1,317
599	30678	1,311
600	31066	1,299
601	31071	1,294
602	31625	1,283
603	30823	1,262
604	31787	1,255
605	31567	1,252
606	31629	1,232
607	31796	1,231
608	30746	1,228
609	31733	1,218
610	31798	1,209
611	30597	1,192
612	31090	1,188
613	31527	1,182
614	30537	1,172
615	31077	1,166
616	31638	1,165
617	31085	1,150

618	30803	1,136
619	31824	1,131
620	30660	1,117
621	30426	1,094
622	31072	1,083
623	39861	1,063
624	31784	1,030
625	30821	1,017
625	31070	1,017
627	30470	1,012
627	39862	1,012
629	30572	1,010
630	31035	1,003
631	39859	1,000

EXHIBIT 4: SAMPLE ADVERTISEMENT

AD Sample



EXHIBIT 5: FINANCIAL STATEMENT

GO MD USA LLC has obtained funding commitments from various partners and believes that it will have sufficient funding to support its business plans. Moreover, the company is not reliant on ACP or Life Line revenue, as these sources of income only pertain to a small segment of GO MD USA's operations.