BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

Application of LTE Wireless, Inc for Designation as an Eligible Telecommunications Carrier in the State of Georgia	)	Docket No.

APPLICATION OF LTE WIRELESS, INC FOR DESIGNATION AS A FACILITIES BASED WIRELESS ELIGIBLE TELECOMMUNICATIONS CARRIER IN THE STATE OF GEORGIA

I. INTRODUCTION

LTE Wireless, Inc ("LTE Wireless" or the "Company"), by its undersigned officer, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the "Act"), Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission ("FCC"), and the and the rules and regulations of the Georgia Public Service Commission (the "Commission"), hereby submits this Application for Designation as a facilities based Eligible Telecommunications Carrier ("ETC") in the State of Georgia.

LTE Wireless seeks ETC designation solely to provide Lifeline service to qualifying Georgia consumers; it will not (and is not eligible to) seek access to funds from the federal Universal Service Fund ("USF") for the purpose of participating in the Link-Up program or high-cost program.

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

Faizal Hassad - Manager
LTE Wireless INC
244 5th Ave Fl2 Suite W221
New York NY 10001
regulatory@ltewireless.com

II. COMPANY OVERVIEW

LTE Wireless is a Georgia Corporation and is registered as a foreign corporation in Georgia (Exhibit A good foreign standing). Its principal office is located at 244 5th Ave Suite W221 New York, NY 10001. LTE Wireless is a provider of commercial mobile radio service ("CMRS") and provides prepaid wireless telecommunications services to consumers by using a combination of its own network and the underlying wireless networks of T Mobile, through Prepaid Wireless Group.

LTE Wireless's Lifeline offers many flexible and affordable plans for customers to choose from. LTE Wireless will not impose credit checks, deposits or contracts. LTE Wireless will market to consumers through many social media channels including Instagram and TikTok as well as its own website to reach customers using media they currently consume. As such, LTE Wireless will contribute to the expansion of mobile wireless and broadband services for low-income consumers in Georgia.

III. THE COMMISSION HAS JURISDICTION OVER DESIGNATION OF WIRELESS ETCS

Section 214(e)(2) of the Act provides state public service Commissions with the "primary responsibility" for the designation of ETCs. Although Section 332(c)(3)(A) of the Act prohibits states from regulating the entry of or the rates charged by any provider

of commercial mobile service or any private mobile service, this prohibition does not allow states to deny wireless carriers ETC status. Under the Act, a state public service 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).

LTE Wireless understands that that Section 214(e)(1)(A) of the Act states that ETCs shall offer services, at least in part, over their own facilities and that Section 54.201(i) of the FCC's Rules (47C.F.R. § 54.201(i)) prohibits state Commissions from designating as an ETC a telecommunications carrier that offers services exclusively through the resale of another carrier's services. LTE Wireless provides wireless services through a combination of its own network infrastructure and those of its underlying provider T Mobile. Therefore, the Commission has the authority under Section 214(e)(2) of the Act to grant LTE Wireless's request for designation as an ETC throughout the service area of its underlying provider in the State of Georgia.

IV. LTE WIRELESS SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC UNDER 47 C.F.R. § 54.201

Section 254(e) of the Act provides that, "only an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive specific federal universal service support." Section 214(e)(2) of the Act authorizes state Commissions, such as the Commission, to designate ETC status for federal universal service purposes and authorizes the Commission to designate wireless ETCs. Section 214(e)(1) of the Act and Section 54.201(d) of the FCC's rules provide that applicants for ETC designation must be common carriers that shall, throughout the designated service area, offer all of the services supported by universal service, either using their own facilities or a combination of their own facilities and the resale of another carrier's services, except where the FCC has

forborne from the "own facilities" requirement. Applicants also must commit to advertising the availability and rates of such services.

V. LTE WIRELESS SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC UNDER 47 C.F.R. § 54.201

Section 254(e) of the Act provides that, "only an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive specific federal universal service support." Section 214(e)(2) of the Act authorizes state Commissions, such as the Commission, to designate ETC status for federal universal service purposes and authorizes the Commission to designate wireless ETCs. Section 214(e)(1) of the Act and Section 54.201(d) of the FCC's rules provide that applicants for ETC designation must be common carriers that shall, throughout the designated service area, offer all of the services supported by universal service, either using their own facilities or a combination of their own facilities and the resale of another carrier's services, except where the FCC has forborne from the "own facilities" requirement. Applicants also must commit to advertise the availability and rates of such services. LTE WIRELESS Will Provide Service Consistent with the FCC's Grant of Forbearance from Section 214's Facilities Requirements

Section 214 requires ETCs to provide services using their facilities, at least in part, the FCC has forborne from that requirement. Since LTE Wireless is using combination of it's own network infrastructure and that of it's underlying carrier, T Mobile, the company does not need a compliance plan approval from the FCC to be certified as an ETC by the State of Georgia. LTE Wireless will provide all consumers 911 and E911 access regardless of the activation status and availability of minutes.

A. LTE Wireless Is a Common Carrier

CMRS providers like LTE Wireless are treated as common carriers.

B. LTE Wireless Will Provide All Supported Services

Through its own network infrastructure and its underlying carrier T Mobile, LTE Wireless is able to provide all of the supported services required by Section 54.101(a) of the FCC's Rules (47 C.F.R. § 54.101(a)) as follows:

1. Voice Telephony Service

As set forth in 47 C.F.R. § 54.101(a)(1), eligible Voice Telephony Services must provide the following: Voice Grade Access to the Public Switched Telephone Network. LTE Wireless provides voice grade access to the public switched telephone network ("PSTN") through a combination of its own network and those of its underlying provider.

Local Usage at No Additional Charge. LTE Wireless offers rate plans that provide its customers with minutes of use for local service at no additional charge.

Access to Emergency Services. LTE Wireless provides 911 and E911 access for all of its customers to the extent the local government in its service area has implemented 911 or E911 systems. As noted, calls to 911 emergency services will always be free and will be available regardless of service activation status or availability of minutes. LTE Wireless also complies with the FCC's regulations governing the deployment and availability of E911 compatible handsets.

Toll Limitation. In its Lifeline and Link Up Reform Order, the FCC provided that toll limitation would no longer be deemed a supported service. "ETCs are not required to offer toll limitation service to low-income consumers if the Lifeline offering provides a set amount of minutes that do not distinguish between toll and non-toll calls."

Nonetheless, LTE Wireless's offerings inherently allow Lifeline subscribers to control their usage, as its wireless service is offered on a prepaid, or pay-as-you-go, basis. LTE Wireless's service, moreover, is not offered on a distance-sensitive basis and local and domestic long distance minutes are treated the same.

LTE Wireless is not required to file a 5 year service improvement plan as it intends to only provide low income services and will not be requesting high cost support.

2. Broadband Internet Access Services

LTE Wireless provides Broadband Internet access service ("BIAS") in accordance with the FCC's minimum service standards to ensure Lifeline customers receive full Lifeline support. The FCC has stated that BIAS consists of the ability for a user to receive "the capability to transmit data to and receive data from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial- up Internet access service." LTE Wireless provides BIAS to low-income consumers through a combination of its own network and those of its underlying provider.

C. LTE Wireless Requests Designation Throughout Its Service Area

LTE Wireless is not a rural telephone company as defined in Section 153(37) of the Act (47

U.S.C. § 153(37)). Accordingly, LTE Wireless is required to describe the geographic area(s) within which it requests designation as an ETC. LTE Wireless requests ETC designation throughout the entire State of Georgia.

Therefore, designation of LTE Wireless as an ETC will cause no growth in the high-cost portions of the USF and will not erode high-cost support from any rural telephone company. In fact, the FCC has determined that "[d]esignation of competitive

ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies." While federal rules (47 U.S.C. §§ 160, 214(e)(5) and 47 C.F.R. §54.207(b)) require that the service area of an ETC conform to the service area of any rural telephone company serving the same area (the "service area conformance" requirement), the FCC's Lifeline and Link Up Reform Memorandum Opinion and Order (FCC 13-44 released April 15, 2013) authorized forbearance from the service area conformance requirements with respect to carriers seeking to provide Lifeline-only service. In light of this forbearance, the Commission has the authority to designate ETCs such as LTE Wireless in rural areas without concern for the service area conformance requirement.

D. LTE WIRELESS Will Advertise the Availability of Supported Services

LTE Wireless will advertise the availability and rates for the services described above using media of general distribution as required by 47 C.F.R. § 54.201(d)(2). LTE Wireless will comply with the FCC's rules regarding information to be included in marketing materials, including FCC rule section 54.405(c). Specifically, LTE Wireless's marketing materials will state, in easily understood language, that: (i) the service is a Lifeline service; (ii) Lifeline is a government assistance program; (iii) the service may not be transferred to someone else; (iv) consumers must meet certain eligibility requirements before enrolling in the Lifeline program; (v) the Lifeline program permits only one Lifeline discount per household; (vi) documentation is necessary for enrollment; and (vii) LTE Wireless is the provider of the services. Moreover, the Lifeline application/certification form will state that Lifeline is a federal benefit and that consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program. LTE Wireless's

marketing is targeted to modern customers using newer technologies such as social media including Instagram and TikTok as well as its own website at www.ltewireless.com.

V. LTE WIRELESS SATISFIES THE ADDITIONAL REQUIREMENTS FOR ETC DESIGNATION UNDER 47 C.F.R. § 54.202(a)

LTE Wireless hereby provides the additional information and certifications required for carriers seeking ETC designation as set forth in 47 C.F.R. § 54.202(a).

A. Service Commitment Throughout the Proposed Designated Service Area

LTE Wireless will provide service in Georgia by a combination of its own network infrastructure and the network of its Underlying Carriers whose networks are operational and largely built out. Thus, LTE Wireless 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.

B. Ability to Remain Functional in Emergency Situations

In accordance with 47 CFR §54.202(a)(2), LTE Wireless, through its Underlying Carriers, has the ability to remain functional in emergency situations. LTE Wireless's agreements with its Underlying Carriers allow the Company to provide to its customers the same ability to remain functional in emergency situations as currently provided by its Underlying Carriers to their own customers, including the ability to maintain a minimum of two hours of back-up power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations. As Tier I carriers, its Underlying Carriers have redundancies, back- up generator power and an extensive disaster recovery program, and have built their networks from the ground up, which means that their networks are consistent across the entire network so that it is easy to monitor and to

troubleshoot should any outage or disruption occur. LTE Wireless's own network infrastructure is located in a data center with redundancies, back-up generators and an extensive disaster recovery plan. LTE Wireless also has the ability to redirect traffic to other carriers in cases of a major disaster.

C. Commitment to Consumer Protection and Service Quality

Under FCC guidelines, an ETC applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards. The Company commits to satisfying all such applicable state and federal requirements related to consumer protection and service quality standards. Specifically, LTE Wireless commits to comply with the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless Service.

LTE Wireless will promptly respond to and courteously resolve customer complaints, will inform customers of the right to file unresolved complaints with the Commission, and will cooperate fully with the Commission to resolve all consumer complaints.

D. LTE WIRELESS is Financially and Technically Capable

In accordance with 47 C.F.R. § 54.202(a)(4), LTE Wireless is financially and technically capable of providing Lifeline-supported services. LTE Wireless currently provides prepaid wireless telecommunications services to customers throughout the country and participated in the Federal Affordable Connectivity Program.

E. Terms and Conditions of Proposed Lifeline Offering

LTE Wireless 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. LTE Wireless

will comply with all minimum service standards imposed by the FCC and the Georgia Commission. LTE Wireless allows consumers to apply their lifeline discount to any of its affordable prepaid plans that can be found at www.ltewireless.com. LTE Wireless encourages customers to find the right plan for them and apply the discount that they are entitled to through the lifeline program. If a customers chooses a plan that includes a payment from the customers and is unable to make that payment, LTE Wireless will automatically change the plan to the basic plan covered completely by the Lifeline benefit, ensuring customers do not loose access to their wireless services.

F. LTE WIRELESS Will Comply with the Lifeline Certification and Verification 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. Customers must then apply through the National Lifeline Eligibility Verifier ("National Verifier"), which they may do online or by submitting all required documentation to the National Verifier by mail. Customers may download a copy of the application form from the Internet (from the National Verifier's website) or request that a copy be mailed to them. LTE Wireless utilizes the standard Lifeline application forms as required by FCC rules, and thus complies with the disclosure and information collection requirements in 47 C.F.R.§ 54.410(d).29 LTE Wireless will certify and verify initial and continued consumer eligibility in accordance with 47 C.F.R. § 54.410, and 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. LTE Wireless further confirms that it will not

provide a consumer with an activated device and will not activate a Lifeline service unless or until it has confirmed that the consumer is a qualifying low-income household pursuant to 47 C.F.R. § 54.409, and completed the required eligibility determination and certification requirements of 47 C.F.R. §§ 54.410, 54.404-54.405. Processing of consumers' applications and determination of eligibility will be performed by the National Verifier. LTE Wireless will certify and verify consumer eligibility in accordance with the FCC's requirements, as revised in the Lifeline and Link-Up Order.

G. Prevention of Waste, Fraud and Abuse

The FCC has taken steps to further curb abuse in the Lifeline program by establishing the National Verifier, which transfers the responsibility of eligibility determination away from Lifeline providers. LTE Wireless will rely on the National Verifier to determine initial and ongoing eligibility of Georgia Lifeline subscribers. The National Verifier queries the National Lifeline Accountability Database ("NLAD") for every enrollment to determine whether a prospective subscriber is currently receiving a Lifeline service from LTE Wireless or any other ETC, and whether anyone else living at the prospective subscriber's residential address is currently receiving Lifeline service. LTE Wireless thus complies with the requirements of section 54.404 of the FCC's rules. In addition, Company personnel emphasize the "one Lifeline service per household" restriction in their direct sales contacts with potential customers.

H. LTE WIRELESS Will Comply With Reporting Requirements

LTE Wireless will provide the Commission a copy of its annual certifications and Lifeline recertification results pursuant to 47 C.F.R. § 54.416 (i.e., FCC Form 555),

finalized reports of audits involving ETC operations in Georgia conducted pursuant to 47 CFR § 54.420, as well as a copy of its annual report filed pursuant to 47 C.F.R. § 54.422 (i.e., FCC Form 481), and will comply with applicable Commission reporting requirements for Lifeline ETCs.

VI. DESIGNATION OF LTE WIRELESS AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST

One of the principal goals of the Act, as amended by the Telecommunications Act of 1996, is "to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies" to all citizens, regardless of geographic location or income. Designation of LTE Wireless as an ETC in Georgia will further that public interest. LTE Wireless is focused on reaching customers through many social media channels and through its website. LTE Wireless does not employee the use of sales agents or "street teams" to market services. LTE Wireless allows consumers to apply the lifeline discount to any of its highly affordable wireless plans with the goal of having the customers pay for a larger plan and using the lifeline discount to help reduce the costs. LTE Wireless does offer a plan that allows for the customers to have a zero cost plan, but encourages customers to find the plan that best fits their needs and use the lifeline benefit that is available to them to help reduce the costs. If a customer is unable to pay for the larger plan, LTE Wireless will default them to the plan that is covered completely by the lifeline benefit so that the customer will not be without service.

VIII. CONCLUSION

LTE Wireless requests Georgia Service Commission grant this amended application for designation as an ETC for the designated service area for the purpose of receiving federal low-income support and state low-income support.

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

Signed on the 19th day of November 2025,

at New York, New York.



Faizal Hassad – Manager

EXHIBIT A

GEORGIA GOOD STANDING

Control Number : 22122434

STATE OF GEORGIA

Secretary of State

Corporations Division
313 West Tower
2 Martin Luther King, Jr. Dr.
Atlanta, Georgia 30334-1530

CERTIFICATE OF EXISTENCE

I, **Brad Raffensperger**, the Secretary of State of the State of Georgia, do hereby certify under the seal of my office that

LTE WIRELESS INC.
a **Foreign Profit Corporation**

was formed in the jurisdiction stated below or was authorized to transact business in Georgia on the below date. Said entity is in compliance with the applicable filing and annual registration provisions of Title 14 of the Official Code of Georgia Annotated and has not filed articles of dissolution, certificate of cancellation or any other similar document with the office of the Secretary of State.

This certificate relates only to the legal existence of the above-named entity as of the date issued. It does not certify whether or not a notice of intent to dissolve, an application for withdrawal, a statement of commencement of winding up or any other similar document has been filed or is pending with the Secretary of State.

This certificate is issued pursuant to Title 14 of the Official Code of Georgia Annotated and is prima-facie evidence that said entity is in existence or is authorized to transact business in this state.

Docket Number	:	29791200
Date Inc/Auth/Filed	:	05/26/2022
Jurisdiction	:	South Dakota
Print Date	:	07/17/2025
Form Number	:	211

Brad Raffensperger

Brad Raffensperger
Secretary of State