

**BEFORE THE
PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI**

DISH Wireless L.L.C.)
Application for Designation as an Eligible)
Telecommunications Carrier in the State of)
Missouri for the Limited Purpose of) Docket No. _____
Providing Lifeline Service to Qualifying)
Customers)
)

**APPLICATION OF DISH WIRELESS L.L.C. FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER IN THE STATE OF
MISSOURI FOR THE LIMITED PURPOSE OF OFFERING LIFELINE
SERVICE TO QUALIFIED HOUSEHOLDS**

Mark P. Johnson
Dentons US LLP
4520 Main Street, Suite 1100
Kansas City, MO 64111-7700
(816) 460-2424
Mark.Johnson@dentons.com

May 4, 2023

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	COMPANY OVERVIEW	2
III.	THE COMMISSION HAS JURISDICTION OVER DESIGNATION OF WIRELESS ETCS.....	5
IV.	THE COMPANY MEETS THE REQUIREMENTS FOR ETC DESIGNATION	5
A.	DISH Wireless Is a Common Carrier	6
B.	DISH Wireless Will Offer the Services Supported by Federal Universal Service .	7
C.	DISH Wireless Will Offer the Services Designated for Support Using a Combination of Its Own Facilities and Resale	7
D.	DISH Wireless Will Provide Gen Mobile-Branded Service Throughout Its Designated Service Area.....	8
E.	The Company Will Advertise the Availability of Gen Mobile Services and Charges Using Media of General Distribution	9
F.	DISH Wireless Will Comply with Service Requirements Applicable to the Support It Receives.....	9
G.	DISH Wireless Will Comply with Any Applicable Two-Year and Five-Year Plan Requirements	10
H.	Consumer Protection and Service Quality Standards	10
I.	Ability to Remain Functional During Emergencies.....	10
J.	DISH Wireless Is Financially and Technically Capable.....	11
K.	Terms and Conditions of Proposed Lifeline Offering	12
L.	Gen Mobile’s Offerings Will Comply with Lifeline Certification and Annual Re- certification Requirements.....	13
M.	DISH Wireless Will Comply With All Regulations Imposed by the Commission	14
N.	Prevention of Waste, Fraud and Abuse.....	14
O.	Commission’s Specific Regulatory/Compliance Requirements	16

V.	DESIGNATING DISH WIRELESS AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST.....	17
A.	Advantages of Gen Mobile Lifeline Plans.....	18
B.	Benefits of Competitive Choice.....	19
VI.	ANTI-DRUG ABUSE CERTIFICATION.....	20
VII.	CONCLUSION.....	20

LIST OF EXHIBITS:

Exhibit 1 – Affidavit

Exhibit 2 – Proposed Lifeline Plans

Exhibit 3 – Service Area

Exhibit 4 – Sample Advertising

Exhibit 5 – Financial Statements

Exhibit 6 – Key Personnel Bios

Exhibit 7 – Certificate of Registration

**Before the
PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI**

DISH Wireless L.L.C.)
Application for Designation as an Eligible)
Telecommunications Carrier in the State of)
Missouri for the Limited Purpose of) Docket No. _____
Providing Lifeline Service to Qualifying)
Customers)
)

I. INTRODUCTION

DISH Wireless L.L.C. dba Gen Mobile (“DISH Wireless” or the “Company”), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”)¹ and Sections 54.101 through 54.207² of the Rules of the Federal Communications Commission (“FCC”),³ and the rules and regulations of the Missouri Public Service Commission (the “Commission”), including the filing requirements for ETC applications,⁴ Sections 4240-2.080(1), 4240-2.060, and 4240-31.016, of the Missouri Code of State Regulations (“MCSR”), and Missouri Statute Title XXV Section 392.248, hereby submits this Application for Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of Missouri. The Company seeks ETC designation for the limited purpose of providing Lifeline service under the brand name “Gen Mobile” to qualifying Missouri consumers.

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R. §§ 54.101-54.207.

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

⁴ See Filing requirements for eligible telecommunications carriers (ETCs), at https://psc.mo.gov/Telecommunications/ETC_Information (“ETC Application Requirements”).

As demonstrated herein, and as certified via an affidavit in Exhibit 1 to this Application, the Company meets all the federal and state statutory and regulatory requirements for designation as an ETC in Missouri. Grant of this Application, moreover, would advance the public interest because it would enable the Company to commence much needed Lifeline services to low-income Missouri residents as soon as possible. Accordingly, the Company respectfully requests that the Commission expeditiously approve this Application.

The Company requests waiver the 20 CSR 4240-4.017 for good cause. As noted in the affidavit of Robert Yap, appended hereto as Exhibit 1, neither the Company or anyone acting on behalf or representing the Company has had any communication with a Commissioner, Commissioner Advisor, Regulatory Law Judge, or any member of Staff member in the one hundred fifty (150) days prior to the filing date of this application regarding any substantive issue included in this filing. Correspondence, communications, pleadings, notices, orders and decisions relating to this Application should be addressed to:

Mark P. Johnson
Dentons US LLP
4520 Main Street, Suite 1100
Kansas City, MO 64111-7700
(816) 460-2424
Mark.Johnson@dentons.com

Alison Minea
Vice President and Associate General Counsel
DISH Wireless L.L.C.
1110 Vermont Ave NW Ste. 450
Washington, DC 20005
(202) 463-3709
Alison.Minea@dish.com

II. COMPANY OVERVIEW

DISH Wireless L.L.C. is a Colorado limited liability company with a principal address at 9601 S. Meridian Blvd, Englewood, CO 80112. Its certification to do business in Missouri

issued by the Missouri Secretary of State's office, is appended hereto as Exhibits 7. DISH Wireless provides, among other things, resold wireless telecommunications services operating in Missouri and other states, using the Gen Mobile brand name and other brand names.

DISH Wireless' parent company, DISH Network Corporation ("DISH Network"), is a connectivity company headquartered in Colorado that has served as a disruptive force in the pay-TV market since 1980. In 2020, DISH Wireless entered the retail wireless business by acquiring the Boost Mobile brand and it expanded its retail wireless interests in 2021 by acquiring the Gen Mobile brand as well as other brands and customer assets. Now, using its own licensed wireless spectrum assets, DISH Wireless is building the nation's first virtualized, cloud-native, Open RAN-based 5G broadband network. To facilitate the buildout, DISH Wireless has entered into multi-year agreements with over 30 partners, including Mavenir, Amazon, Dell, CISCO, VM Ware, IBM, Oracle, Nokia, Fujitsu, MTI, Intel, Altiostar, Samsung, and Qualcomm. Because DISH Wireless is actively constructing wireless facilities around the country, it is well positioned to identify opportunities to target buildouts in underserved areas.

Even as its 5G network is under construction, DISH Wireless has already been competing in the retail wireless space and is an approved provider in the Federal Communications Commission's Affordable Connectivity Program ("ACP"). The Missouri Commission emphasizes the ACP on its web site on Discount Programs for Low-Income and Disabled Consumers. Missourians who qualify for the ACP will be able to avail themselves of Lifeline's benefits when they subscribe to DISH Wireless' services.

Under the Gen Mobile and other brand names, DISH Wireless currently uses 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 broadband services.⁵ Available Gen Mobile branded plans include talk, text, and data at various data speeds under the ACP's monthly \$30 subsidy for eligible consumers. DISH Wireless has 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"). DISH Wireless is currently designated as a wireless ETC in Colorado, New York, Oklahoma and authorized by the California Public Utilities Commission to provide California LifeLine service and plans to file for ETC status in other states over time. The Company will provide documentation confirming its ETC status in other jurisdictions upon request from the Commission's Staff.

DISH Wireless now seeks an ETC designation in Missouri so that it can (i) serve low-income Missouri customers, (ii) supplement the amount of support available to its current ACP customers, and (iii) invite new, underserved customers to benefit from Lifeline and other federal support programs. DISH Wireless' Lifeline-supported plans will be offered to prepaid customers under the Gen Mobile brand, a recognized and trusted provider in this market segment. Gen 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 21st Century society and opportunities. Gen Mobile customers can choose from several affordable prepaid calling plans and handsets and have access to high-quality, responsive customer service. Gen Mobile prepaid plans start as low as \$10 per month and can be refilled at an estimated 10,000 retail locations nationwide.

⁵ See 47 C.F.R. § 54.1802(b) ("a bundle of broadband internet access service along with fixed or mobile voice telephony service, text messaging service, or both" is an ACP-eligible plan).

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 this 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 DISH Wireless as an ETC. As demonstrated below, DISH Wireless fulfills the requirements to be designated as an ETC in Missouri.

IV. THE COMPANY MEETS THE REQUIREMENTS FOR ETC DESIGNATION

An application for ETC designation in Missouri must meet specific federal and state statutory and regulatory requirements. As demonstrated below, DISH Wireless meets the requirements for ETC designation by the FCC pursuant to Section 214(e)(2) of the Communications Act. 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; (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,

⁶ 47 U.S.C. § 214(e)(2).

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 application 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, the Commission considers the benefits of increased consumer choice and the unique advantages and disadvantages of the applicant's service offerings.¹⁰

A. DISH Wireless Is a Common Carrier

DISH Wireless 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.

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 C.F.R. § 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 DISH Wireless is not seeking high cost support in this Application, it is building out its 5G network in accordance with certain FCC-approved construction deadlines as described below.

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

¹⁰ See, e.g., *Virgin Mobile ETC Designation Order in the States of Alabama, 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).

B. DISH Wireless Will Offer the Services Supported by Federal Universal Service

Pursuant to Section 54.101(a) of the FCC's rules, DISH Wireless' 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, DISH Wireless also provides broadband internet access service to consumers.¹³

C. DISH Wireless Will Offer the Services Designated for Support Using a Combination of Its Own Facilities and Resale

DISH Wireless, through the Gen Mobile brand, offers the supported services – voice telephony service and broadband Internet access service – meeting the standards set in the FCC's rules.¹⁴ DISH Wireless is currently 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 Missouri residents, are described in Exhibit 2.

In general, Section 214 requires ETCs to provide services using their facilities, at least in part. DISH Wireless is in a unique position to increase wireless competition and serve low-income consumers. Gen Mobile service plans are currently supported by AT&T and T-Mobile's networks. This will allow DISH Wireless to immediately introduce new Lifeline options for Missouri consumers as soon as the Commission approves this Application. At the same time,

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).

DISH Wireless is building out an advanced nationwide 5G network of its own. The Company recently launched 5G broadband service in over 130 cities (including in Missouri) and currently offers service to more than 20 percent of the U.S. population.¹⁵ In areas of Missouri, where service on DISH Wireless' own network is not yet available or where the Company does not yet offer Lifeline products on its own network, DISH Wireless 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), DISH Wireless will offer Gen 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. A complete description of the Gen Mobile terms, conditions and rates applicable for supported services can be found at <https://www.genmobile.com>. Because DISH Wireless is deploying facilities-based wireless voice and broadband services in Missouri and other states, there is no need for DISH Wireless to obtain an approved FCC Compliance Plan in accordance with the *2012 Lifeline Reform Order*.¹⁶

D. DISH Wireless Will Provide Gen 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, DISH Wireless will provide service in the same 50-state footprint where it currently offers ACP service – this includes the entire geographic boundary of the State of Missouri subject to coverage limits of underlying carriers and DISH Wireless' own network. 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

¹⁵ See DISH Press Release, DISH's Smart 5G™ Wireless Network is Now Available to Over 20 Percent of the U.S. Population, June 15, 2022. See also Applications of American H Block Wireless L.L.C., DBSD Corporation, Gamma Acquisition L.L.C., and Manifest Wireless L.L.C. for Extension of Time, *Order of Modification and Extension of Time to Construct*, DA 20-1072 WT Docket 18-197 (rel. Sept. 11, 2020).

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

available. DISH 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 Missouri coverage footprint or service area by zip code is attached hereto as Exhibit 3.

E. The Company Will Advertise the Availability of Gen 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 Gen 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 Gen 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 the Commission's rules. Samples of the Company's Lifeline advertising are attached hereto as Exhibit 4.

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

Pursuant to 47 C.F.R. § 54.202(a)(1)(i), DISH Wireless will comply with the service requirements applicable to the supported services it will be offering in the identified service areas. Gen Mobile plans will be offered in Missouri initially by reselling AT&T and/or T-Mobile service, and in the future will also be supported by DISH'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. DISH Wireless 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. DISH Wireless is in a unique position, however, because it is constructing its own facilities-based 5G wireless network subject to FCC-approved buildout milestones, including having already deployed its 5G broadband service to 20% of the U.S. population on June 14, 2022 and scheduled to deploy to 70% of the U.S. population by June 14, 2023 and (using certain low-band spectrum) to 75% of the population of each Partial Economic Area by June 14, 2025. DISH Wireless 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. DISH Wireless 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). DISH Wireless' greenfield 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 once the construction is complete.

Currently, DISH Wireless 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. DISH Wireless 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 DISH Wireless satisfies these criteria.

DISH Wireless is financially stable and capable of honoring its service obligations to customers, as shown in Exhibit 5, a link to the Form 10-K of DISH Network Corporation, parent company of DISH Wireless, as well as meeting its federal and state regulatory obligations. The Company will not rely exclusively on revenues from the provision of Lifeline services for its operating revenues. The Company also has access to additional capital resources from its parent and affiliate companies. The Company's financial resources position the Company to expand its operations to serve currently unserved/underserved eligible low-income Missouri consumers and increase competition.

In addition, the proposed Lifeline offerings will be overseen by a team of personnel with substantial industry experience with the requirements of the federal Lifeline program and marketing to the low-income consumer sector. Attached as Exhibit 6 is a current list of the Company's key personnel responsible for Gen Mobile-branded Lifeline offerings, with

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

biographical information for each, showing that the Company has the expertise necessary to provide the services detailed herein.

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 Missouri. 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. Gen 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 DISH Wireless 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 DISH Wireless 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. Gen 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. DISH Wireless 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. DISH Wireless 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. DISH Wireless will require all Gen Mobile’s Lifeline applicants to complete the standard Lifeline application forms in the National Verifier environment. The standard Lifeline 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, DISH Wireless 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

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>).

subscriber and the subscriber must use their service every thirty (30) days in order to maintain their Lifeline benefit.

DISH Wireless will also comply with Section 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.¹⁹

M. DISH Wireless Will Comply With All Regulations Imposed by the Commission

By way of this Application, DISH Wireless hereby declares its ability and goal to comply with all the rules and regulations that the Commission may lawfully impose upon the Company's provision of service contemplated by this Application, including any reporting requirements set by the Commission. DISH Wireless will answer any questions or present additional testimony and other evidence about its services within the state upon the Commission's request. In addition, DISH wireless promises to pass on all support received from the federal Universal Service Fund ("USF") to its qualified Lifeline customers.

N. Prevention of Waste, Fraud and Abuse

The Company recognizes the importance of safeguarding the USF, and has implemented measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. Gen 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 from DISH Wireless or any other ETC, and whether

¹⁹ 47 C.F.R. §§ 54.405(e), 54.410(f).

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

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 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), DISH Wireless will provide the subscriber advance notice when a subscriber's failure to use the Lifeline service 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 in the future by reapplying and re-establishing eligibility.

To further protect the integrity of the USF, DISH Wireless contracts with third party vendors to backstop USAC's own processes and procedures. First, the Company will use Emerios Enterprise Services Inc. ("Emerios") software to process Lifeline applications. Among other things, Emerios uses third-party verification sources (including 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. DISH Wireless has hired experienced staff and a third party company to provide RTR for the Company's Lifeline enrollments. This third party company has substantial experience running RTR for other Lifeline providers.

O. Commission's Specific Regulatory/Compliance Requirements

DISH Wireless represents that it will comply with the Commission's rules and orders that are applicable to wireless ETCs. Specifically, DISH Wireless will comply the following requirements set forth in the Commission's ETC Application Requirements: (1) provide basic information about the company;²⁰ (2) address specific regulatory and compliance issues;²¹ and (3) provide information about the company's services.²²

For providing basic information about the company, DISH Wireless is legally organized in the State of Missouri as a foreign limited liability company. Attached hereto as Exhibit 7 is a copy of the documentation about DISH Wireless' legal organization. Another requirement under the basic information of the company, is to identify any individual or entity with ownership of 10% or more of the Company. DISH Wireless is wholly owned by DISH Wireless Holding L.L.C. The Company's key management for the Gen Mobile brand is stated as attached hereto as Exhibit 6. Lastly under the basic information requirements, DISH Wireless' ownership or management is not shared with another company receiving the USF.

To address the specific regulatory and compliance issues, the Company does not have any pending action or any final unsatisfied judgements against it from any state or federal agency

²⁰ See 20 C.S.R. §§ 4240-2.060, 4240-31.016.

²¹ See 20 C.S.R. §§ 4240-2.060, 4240-31.016

²² See 47 C.F.R. §§ 54.201, 54.202, 54.202.6, 54.405.

or court involving customer service or rates within the past three years. The Company is not delinquent in any reporting or assessment obligations with the Commission. In addition, there has not been any matter brought in the last 10 years by any state, federal or law enforcement agency involving fraud, deceit, perjury, stealing or omission or misstatement of fact against the Company, any person or entity with 10% or more ownership interest in DISH Wireless, or any affiliated company under common management or ownership of DISH Wireless. DISH Wireless has not obtained any waivers of the ETC-related requirements from the FCC.

Lastly, DISH Wireless provides the following five statements: (1) the Company will comply with the ETC requirements established by the Commission; (2) the Company does not intend to seek support from the Missouri USF nor participate in the Disabled program; (3) the Company commits to maintaining current Company contact information on the Commission's Electronic Filing and Information System; (4) the Company is compliant with contribution obligations to the federal USF; and (5) the Company is certified and registered by the Commission and is compliant with all reporting and assessment obligations.

DISH Wireless meets the ETC Application Requirement to provide information about the company's services, as DISH Wireless provided all applicable information about the Company's services throughout this Application.

V. DESIGNATING DISH WIRELESS 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 Gen Mobile-branded Lifeline services. Americans increasingly need greater access to voice and broadband services, and low-income Missouri consumers in particular need affordable and available access. The Company is currently helping to close the gap by 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 DISH Wireless is deploying a new facilities-based wireless 5G network throughout the country over the next several years, designating DISH Wireless 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 Gen Mobile Lifeline Plans

Authorizing the Company as a Lifeline ETC in the State of Missouri will enable the Company to provide eligible low-income consumers with access to high quality mobile voice, text, and data services. This will increase those consumers' choices in service providers and service options and make essential communications services more affordable and accessible to these consumers. Mobile services are overwhelmingly preferred by Lifeline-eligible consumers who may be able to afford only a single connection, may frequently change residences or places of employment, and may need the ability to communicate with prospective employers. Some of these individuals may be experiencing homelessness and rely upon Lifeline service as their single reliable source of connectivity. Lifeline services also ensure that consumers 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.

Gen Mobile Lifeline service plans provide meaningful options for low-income consumers because they offer low-cost, reliable alternatives to traditional rate plans. Among the Gen Mobile Lifeline offerings is a plan with 1,000 voice minutes, 1,000 texts, and 4.5 GB of data available to all qualifying low-income Missouri consumers for no cost. Qualified Missouri consumers will have the choice to apply their Lifeline discount to existing Gen Mobile plans.

In addition, Gen Mobile Lifeline plans alleviate customer concerns regarding deposits, hidden costs, varying monthly charges, and long-term contract issues. Gen 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."²³ 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."²⁴ 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 Gen Mobile Lifeline options in Missouri will add affordable, innovative mobile wireless choices to the marketplace, and could spur other ETCs to expand and improve their own Lifeline service offerings. Granting ETC designation to DISH Wireless will promote competition for the benefit of consumers and will have desirable effects upon the Missouri market for Lifeline services by making these services more available and accessible, thereby supporting the goals of universal service.

²³ *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).

²⁴ *See Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, Memorandum Opinion and Order, CC Docket No. 96-45, DA 00-2896, ¶ 17 (rel. Dec. 26, 2000).

VI. ANTI-DRUG ABUSE CERTIFICATION

In accordance with Section 5301 of the Anti-Drug Abuse Act of 1988, DISH Wireless certifies that no party to the Application is subject to denial of federal benefits, including FCC benefits.

VII. CONCLUSION

Based on the foregoing, designation of DISH Wireless as an ETC in the State of Missouri accords with the requirements of Section 214(e)(2) of the Act and is in the public interest.

WHEREFORE, DISH Wireless respectfully requests that the Commission designate DISH Wireless as an ETC in the State of Missouri for the purpose of participating in the Lifeline program and grant a waiver of the terms of 20 CSR 4240-4.017 for good cause shown.

Respectfully submitted,



Mark P. Johnson Mo. #30740
Dentons US LLP
4520 Main Street, Suite 1100
Kansas City, MO 64111-7700
(816) 460-2424
Fax (816) 531-7545
Mark.Johnson@dentons.com

Attorneys for DISH Wireless LL.C.

EXHIBIT 1: AFFIDAVIT

STATE OF California


ss.

COUNTY OF Los Angeles

Comes now Robert Yap, being of lawful age and duly sworn, and who swears and affirms as follows:

I, Robert Yap, a natural person, do hereby swear and affirm that I hold the position of Vice President of Gen Mobile with DISH Wireless L.L.C., officer of DISH Wireless L.L.C. and am authorized to certify to the truthfulness of the information in this Application. I have read the contents of this Application and state that the information and statements contained in this Application are true and correct to the best of my knowledge and belief.

In addition, I request waiver of Rule 4.017 for good cause. By signing this Affidavit, I hereby certify that neither I, nor any other member of DISH Wireless L.L.C. or person acting on behalf of or representing DISH Wireless L.L.C., has had communications with a Commissioner, Commissioner Advisor, Regulatory Law Judge, or any member of their support team in the one hundred fifty (150) days prior to the filing date of this application regarding any substantive issue included in this filing.


Signature
Robert Yap
Printed Name
Vice President
(Title)

Subscribed and sworn before me this ___ day of _____, 2023.

Notary Public

My commission expires:

(See Attached)

CALIFORNIA JURAT
CERTIFICATE

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

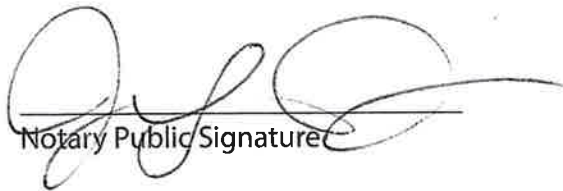
State of California }

County of Los Angeles }

Subscribed and sworn to (or affirmed) before me on this 04 day of May, 2023

by Robert Yap, proved to me on the basis of

satisfactory evidence to be the person(s) who appeared before me.


Notary Public Signature



(Seal)

OPTIONAL INFORMATION

DOCUMENT

SIGNER CAPACITY

(name or type of document)

(capacity claimed by the signer)

(number of pages)

(document date)

NOTICE
THE NOTARY PUBLIC DOES NOT
CERTIFY THE AUTHORIZED
CAPACITY OF THE SIGNER

EXHIBIT 2: PROPOSED LIFELINE PLANS

<u>Subsidy Amount (\$)</u>	<u>Subsidy Type</u>	<u>Gen 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)	Unlimited talk & text, 11 GB of data

EXHIBIT 3: MISSOURI SERVICE AREA

63005	63072	63133	63369	63460
63010	63073	63134	63373	63461
63011	63074	63135	63376	63462
63012	63077	63136	63377	63463
63013	63080	63137	63379	63465
63014	63084	63138	63380	63467
63015	63087	63139	63381	63468
63016	63088	63140	63382	63469
63017	63089	63141	63383	63471
63019	63090	63143	63384	63472
63020	63091	63144	63385	63473
63021	63099	63146	63386	63474
63023	63101	63147	63387	63501
63025	63102	63167	63388	63530
63026	63103	63180	63389	63531
63028	63104	63301	63390	63532
63030	63105	63303	63401	63533
63031	63106	63304	63430	63534
63033	63107	63330	63431	63535
63034	63108	63332	63432	63536
63036	63109	63333	63433	63537
63037	63110	63334	63434	63538
63038	63111	63336	63435	63539
63039	63112	63339	63436	63540
63040	63113	63341	63437	63541
63041	63114	63343	63438	63543
63042	63115	63344	63439	63544
63043	63116	63345	63440	63545
63044	63117	63347	63441	63546
63045	63118	63348	63442	63547
63048	63119	63349	63443	63548
63049	63120	63350	63445	63549
63050	63121	63351	63446	63551
63051	63122	63352	63447	63552
63052	63123	63353	63448	63555
63055	63124	63357	63450	63556
63056	63125	63359	63451	63557
63057	63126	63361	63452	63558
63060	63127	63362	63453	63559
63061	63128	63363	63454	63560
63068	63129	63365	63456	63561
63069	63130	63366	63457	63563
63070	63131	63367	63458	63565
63071	63132	63368	63459	63566

63567	63746	63852	64011	64079
63601	63747	63853	64012	64080
63620	63748	63855	64014	64081
63621	63750	63857	64015	64082
63622	63751	63862	64016	64083
63623	63755	63863	64017	64084
63624	63760	63866	64018	64085
63625	63763	63867	64019	64086
63626	63764	63869	64020	64088
63627	63766	63870	64021	64089
63628	63767	63873	64022	64090
63629	63769	63874	64024	64092
63630	63770	63876	64028	64093
63631	63771	63877	64029	64096
63633	63775	63878	64030	64097
63636	63776	63879	64034	64098
63637	63780	63882	64035	64101
63638	63781	63901	64036	64102
63640	63782	63932	64037	64105
63645	63783	63933	64040	64106
63648	63784	63934	64048	64108
63650	63785	63935	64050	64109
63653	63787	63936	64052	64110
63654	63801	63937	64053	64111
63655	63820	63939	64054	64112
63656	63821	63940	64055	64113
63660	63822	63941	64056	64114
63662	63823	63942	64057	64116
63663	63825	63943	64058	64117
63664	63826	63944	64060	64118
63665	63827	63945	64061	64119
63670	63828	63950	64062	64120
63673	63829	63951	64063	64123
63675	63830	63952	64064	64124
63701	63833	63953	64065	64125
63703	63834	63954	64066	64126
63730	63837	63955	64067	64127
63732	63839	63956	64068	64128
63735	63840	63957	64070	64129
63736	63841	63960	64071	64130
63737	63845	63961	64072	64131
63739	63846	63964	64074	64132
63740	63847	63965	64075	64133
63743	63848	63966	64076	64134
63744	63849	63967	64077	64136
63745	63851	64001	64078	64137

64138	64445	64503	64671	64770
64139	64446	64504	64672	64771
64145	64448	64505	64673	64772
64146	64449	64506	64674	64776
64147	64451	64507	64676	64778
64149	64453	64601	64679	64779
64150	64454	64620	64681	64780
64151	64455	64622	64682	64783
64152	64456	64623	64683	64784
64153	64457	64624	64686	64788
64154	64458	64625	64688	64790
64155	64459	64628	64689	64801
64156	64461	64630	64701	64804
64157	64463	64631	64720	64830
64158	64465	64632	64722	64831
64161	64466	64633	64723	64832
64163	64467	64635	64724	64833
64164	64468	64636	64725	64834
64165	64469	64637	64726	64835
64166	64470	64638	64728	64836
64167	64471	64639	64730	64840
64401	64473	64640	64733	64841
64402	64474	64641	64734	64842
64420	64475	64642	64735	64843
64421	64476	64643	64738	64844
64422	64477	64644	64739	64847
64423	64479	64645	64740	64848
64424	64480	64646	64741	64849
64426	64481	64647	64742	64850
64427	64482	64648	64743	64854
64428	64483	64649	64744	64855
64429	64484	64650	64745	64856
64430	64485	64651	64746	64857
64431	64486	64652	64747	64858
64432	64487	64653	64748	64859
64433	64489	64655	64750	64861
64434	64490	64656	64752	64862
64436	64491	64657	64755	64863
64437	64492	64658	64756	64865
64438	64493	64659	64759	64866
64439	64494	64660	64761	64867
64440	64496	64661	64762	64868
64441	64497	64664	64763	64870
64442	64498	64667	64765	64873
64443	64499	64668	64767	64874
64444	64501	64670	64769	65001

65010	65079	65278	65440	65582
65011	65080	65279	65441	65583
65013	65081	65280	65443	65584
65014	65082	65281	65444	65586
65016	65083	65282	65446	65588
65017	65084	65283	65449	65589
65018	65085	65284	65452	65590
65020	65101	65285	65453	65591
65023	65109	65286	65456	65601
65024	65201	65287	65457	65603
65025	65202	65301	65459	65604
65026	65203	65302	65461	65605
65032	65211	65305	65462	65606
65034	65215	65320	65463	65608
65035	65217	65321	65464	65609
65037	65230	65322	65466	65610
65039	65231	65323	65468	65611
65040	65232	65324	65470	65612
65041	65233	65325	65473	65613
65043	65236	65326	65479	65614
65046	65237	65329	65483	65616
65047	65239	65330	65484	65617
65048	65240	65332	65486	65618
65049	65243	65333	65501	65619
65050	65244	65334	65529	65620
65051	65246	65335	65534	65622
65052	65247	65336	65535	65624
65053	65248	65337	65536	65625
65054	65250	65338	65541	65626
65058	65251	65339	65542	65627
65059	65254	65340	65543	65629
65061	65255	65344	65548	65630
65062	65256	65345	65550	65631
65063	65257	65347	65552	65632
65064	65258	65348	65555	65633
65065	65259	65349	65556	65634
65066	65260	65350	65557	65635
65067	65261	65351	65559	65637
65068	65262	65354	65560	65638
65069	65263	65355	65564	65640
65072	65264	65360	65565	65641
65074	65265	65401	65566	65644
65075	65270	65409	65567	65646
65076	65274	65436	65570	65647
65077	65275	65438	65571	65648
65078	65276	65439	65580	65649

65650	65682	65724	65755	65783
65652	65685	65725	65756	65784
65653	65686	65727	65757	65785
65654	65689	65728	65759	65786
65655	65690	65729	65760	65787
65656	65692	65730	65761	65788
65657	65702	65731	65762	65789
65658	65704	65732	65764	65790
65660	65705	65733	65765	65791
65661	65706	65734	65766	65793
65662	65707	65735	65767	65801
65663	65708	65737	65768	65802
65664	65710	65738	65769	65803
65666	65711	65739	65770	65804
65667	65712	65740	65771	65806
65668	65713	65742	65772	65807
65669	65714	65744	65773	65809
65672	65715	65745	65774	65810
65674	65717	65746	65775	65897
65676	65720	65747	65777	72643
65679	65721	65752	65778	
65680	65722	65753	65779	
65681	65723	65754	65781	

EXHIBIT 4: SAMPLE ADVERTISEMENT

Buckslips 3.5" by 9.5"



The advertisement features a red background with a white Gen Mobile logo at the top. Below the logo, the text "FREE MOBILE SERVICE" is written in large, bold, red letters. Underneath, it says "See if you qualify for the Lifeline Program with Gen Mobile!". At the bottom, there is a black smartphone with the Gen Mobile logo on its screen, and the text "Apply Today" in white. A small disclaimer is located at the very bottom of the ad.

genmobile

FREE MOBILE SERVICE

See if you qualify for the Lifeline Program with Gen Mobile!

Apply Today

QCH Wireless LLC is authorized to provide Lifeline service under the Gen Mobile brand. The Lifeline Program ("Lifeline") is a government assistance program that provides discounted telephone services to eligible households funded by the Federal Universal Service Fund. A household means adults and children who are living together at the same address as one economic unit. An economic unit includes all adults (more or less 18 years old unless emancipated) contributing to and sharing the household's income and expenses. Only one discount per eligible household is permitted and is non-transferable to another person. The discount is tied to a single, primary residential address. Any household that receives the one discount per household rate of discount or wrongly provides false information to obtain the Lifeline discount will lose its discount or will be banned from Lifeline and may be prosecuted by the government. There are two ways to qualify for the Lifeline discount: Program-Based or Income-Based. Program-Based qualification requires someone in the household to be enrolled in a public assistance program such as Medicaid, SNAP, Supplemental Security Income (SSI), or other qualifying government programs. Income-Based qualification requires the household's total annual gross income is at or less 135% of the Federal Poverty Guidelines. The National Verifier administered by the Universal Service Administrative Company ("USAC") will determine whether the household meets the eligibility requirements to participate in Lifeline. Many factors beyond Gen Mobile's control (such as network problems or congestion, signal strength, structure, weather, geography, etc.) may affect the customer's ability to make and receive calls on the customer's wireless device, the quality of those calls, and the speed of the customer's service. As a result, the customer's service, including calls or attempted calls to emergency services like 911, may be interrupted, may fail, or result in dropped or blocked connections. Because Unavailable, service speeds are slow, or call quality at times may be poor. Go to genmobile.com for Gen Mobile's terms & conditions, including the full restrictions for Lifeline, and wireless service plans.

EXHIBIT 5: FINANCIAL STATEMENT (LINK TO 10-K)

Form 10-K of DISH Network Corporation, DISH Wireless's parent company,
<https://ir.dish.com/node/34501/html>.

EXHIBIT 6: KEY PERSONNEL BIOS

Robert Yap, VP of Gen Mobile, a DISH Wireless L.L.C. brand, has over 20 years of telecommunication experience. Mr. Yap was an executive at several telecommunications companies (wireless, CLEC, and calling cards), including at Gen Mobile, Inc. where he was a founder, and was a corporate attorney at McDermott, Will & Emory. From 2015 to 2017, he was the President of TruConnect Communications, Inc., a nationwide wireless Lifeline Provider with over 500,000 customers during his tenure. In 2018, Mr. Yap and his fellow executives founded Gen Mobile, Inc. (later acquired by DISH Wireless L.L.C.), to provide consumers affordable wireless service options and to help bridge the digital divide for the 30% of Americans that have limited access to the internet. He hopes to provide the same in the State of Missouri with Gen Mobile as the head of the brand under DISH Wireless.

Mr. Yap also has served on several nonprofit boards including as chairman of the Asian Pacific Community Fund (“APCF”), a non-profit that has raised over \$5,000,000 for distribution to non-profits that serve communities in Los Angeles, and as a current board member of Center for Asian Americans United for Self-Empowerment (“CAUSE”), a non-profit dedicated to politically empowering the Asian Pacific American community. He also held leadership positions at Project by Project and the National Asian Pacific American Bar Association, and served in AmeriCorps at Public Allies Chicago.

Mr. Yap received his B.A. in Economics from Northwestern University and his J.D., with honors, from George Washington University School of Law.

Anthony Lombardo, Director and Head of Finance for Gen Mobile, is an experienced Finance and M&A professional. Prior to joining Gen Mobile, he worked with various early stage and venture backed start-ups as well as servicing private equity and strategic clients with buy-side and sell-side transaction support. He has experience supporting clients with needs in the CFO suite and finance operations and started his career at PricewaterhouseCoopers where he spent 13 years in both the audit and transaction support groups. Mr. Lombardo served as CFO at Gen Mobile, Inc. and is now the head of finance for the Gen Mobile brand.

Mr. Lombardo received his Bachelor of Science in Economics from The Wharton School at the University of Pennsylvania and his Master of Business Administration from the UCLA Anderson School of Management. Mr. Lombardo is also a licensed CPA (inactive) in the state of California.

Jennifer Lin, Head of Marketing, Gen Mobile, is a marketing and market research professional. She previously worked in market research at Farmers Insurance and was part of the team that launched online health insurance broker, HealthInsurance.com. Mr. Lombardo served as CFO at Gen Mobile, Inc. and is now the head of finance for the Gen Mobile brand.

Ms. Lin received her Bachelor’s degree from the University of California, Los Angeles and her M.P.H. from Boston University.

Jose Andrade, Head of Operations, Gen Mobile, has over 15 years of operational management experience at wireless telecommunications companies including from 2015-2018 as Director of Operations at TruConnect, a wireless Lifeline Provider with over 500,000 customers and from 2018-2021 as Director of Operations at Gen Mobile, Inc. His experience includes PMO leadership, customer service management, business optimization, data analysis, and leadership development. Mr. Andrade is responsible for day-to-day operations at Gen Mobile.

Mr. Andrade received his Business degree from the California State University-Los Angeles.

Sola Lee, Senior Corporate Counsel, Gen Mobile, has over 10 years of legal experience including as Counsel from 2015 to 2017 at TruConnect, a wireless Lifeline Provider with over 500,000 customers and from 2018-2021 at Gen Mobile, Inc. She was responsible for legal, regulatory, and compliance functions at TruConnect and Gen Mobile. Ms. Lee is the lead counsel for the Gen Mobile brand.

Ms. Lee graduated with a Bachelor's degree from the University of California, Davis and with a J.D. from the University of Oregon.

Vincent Buongiovanni, Head of Sales Operations – ACP/Lifeline, Gen Mobile, has over 10 years of experience in the wireless telecommunications industry, including managing the sales, operations, and compliance of Assurance Wireless' Affordable Connectivity Program and Lifeline Program nationwide, specifically managing the field agents used by the service provider. He also served as interim Director of Wireless at Assurance during the acquisition of Sprint by T-Mobile and is part-time police officer in Hi-Nella, New Jersey. Mr. Buongiovanni is in charge of the sales operations for ACP and Lifeline program for the Gen Mobile brand at DISH Wireless.

EXHIBIT 7: CERTIFICATE OF REGISTRATION

(See attached).



State of Missouri
John R. Ashcroft, Secretary of State

Corporations Division
PO Box 778 / 600 W. Main St., Rm. 322
Jefferson City, MO 65102

FL001426763
Date Filed: 12/16/2019
John R. Ashcroft
Missouri Secretary of State

**Amendment of a
Foreign Limited Liability Company**
(Submit with filing fee of \$25.00)

- The name of the foreign limited liability company as currently registered in Missouri: Kings Peak Wireless L.L.C.
Missouri Charter #: FL00 426763
- The name of the limited liability company in the parent state: Kings Peak Wireless L.L.C.
- The foreign limited liability company was formed under the laws of Colorado on the date of October 27, 2016
month/day/year *State of jurisdiction*
- The foreign limited liability company's certificate of registration is hereby amended as follows (complete all that apply):
 - Changing the name of the limited liability company in the parent state:
From Kings Peak Wireless L.L.C. To DISH Wireless L.L.C.
 - Changing the name of the limited liability company to be used in Missouri:
From Kings Peak Wireless L.L.C. To DISH Wireless L.L.C.
 - Changing the limited liability company's state of registration:
From _____ To _____
 - Any other matter:
 - Adding series under section 347.157 RSMo. (Form LLC 4A must be attached.)
- The effective date of this document is the date it is filed by the Secretary of State of Missouri unless a future date is otherwise indicated: _____
month/day/year
- The amendment shall include a certificate of existence or document of similar import duly authenticated by the Secretary of State or other official having custody of the records in the state or country under whose laws it is registered. Such document should be dated within sixty calendar days from the filing for acceptance.

In Affirmation thereof, the facts stated above are true and correct:

(The undersigned understands that false statements made in this filing are subject to the penalties provided under Section 575.040, RSMo)

 **Eric J. Pagels** **12-12-2019**
Authorized Signature of Member or Manager *Printed Name* *Date*

Name and address to return filed document:

Name: Jonathan Anderson

Address: 8801 S. Meridian Blvd.

City, State, and Zip Code: Englewood CO 80112

LLC-14 (01/2017)

STATE OF MISSOURI



John R. Ashcroft
Secretary of State

CERTIFICATE OF AMENDMENT

WHEREAS,

DISH Wireless L.L.C.
FL001426763

Formerly in Missouri

Kings Peak Wireless L.L.C.

an entity organized under the laws of the State of Colorado, has delivered to me and that I have filed its Certificate of Amendment of its Articles of Organization; that said entity has in all respects complied with the requirements of law governing the Amendment of Articles of Organization and the said Articles are amended in accordance therewith.

IN TESTIMONY WHEREOF, I hereunto set my hand and cause to be affixed the GREAT SEAL of the State of Missouri. Done at the City of Jefferson, this 16th day of December, 2019.


Secretary of State



CERTIFICATE OF AMENDMENT

WHEREAS,

DISH Wireless L.L.C.
FL001426763

Formerly in Missouri

Kings Peak Wireless L.L.C.

an entity organized under the laws of the State of Colorado, has delivered to me and that I have filed its Certificate of Amendment of its Articles of Organization; that said entity has in all respects complied with the requirements of law governing the Amendment of Articles of Organization and the said Articles are amended in accordance therewith.

IN TESTIMONY WHEREOF, I hereunto set my hand and cause to be affixed the GREAT SEAL of the State of Missouri. Done at the City of Jefferson, this 16th day of December, 2019.