

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

In the Matter of the Application of )  
**LTE Wireless Inc.** )  
for Designation as an Eligible ) Case No. \_\_\_\_\_  
Telecommunications Carrier in the State of )  
Missouri )  
)

**APPLICATION OF LTE WIRELESS INC. FOR DESIGNATION AS AN ELIGIBLE  
TELECOMMUNICATIONS CARRIER IN THE STATE OF MISSOURI**

COMES NOW LTE Wireless Inc. (“LTE Wireless” or “Company”) and makes application to the Missouri Public Service Commission (“Commission”) for Designation as an Eligible Telecommunications Carrier (“ETC”) pursuant to Section 214(e)(1)-(2) of the Federal Communications Act of 1934, as amended (“the Act”)<sup>1</sup>, Section 54.201 *et seq.* of the rules of the Federal Communications Commission (“FCC”)<sup>2</sup>, and the rules and regulations of the Commission, including 20 CSR 4240-2.060, 20 CSR 4240-31.015 and 20 CSR 4240-31.016. The Company requests statewide ETC designation.

LTE Wireless seeks ETC designation solely to provide Lifeline service to qualifying Missouri customers. 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.<sup>3</sup>

The Company satisfies all of the statutory and regulatory requirements for designation as an ETC in the State of Missouri. As explained herein, the public interest would be served by granting this petition.

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<sup>1</sup> 47 U.S.C. § 214(e)(2).

<sup>2</sup> 47 C.F.R. § 54.201 *et seq.*

<sup>3</sup> Given that LTE Wireless only seeks Lifeline support from the low-income program and does not seek any high-cost support, ETC certification requirements for the high-cost program are not applicable to the Company. This includes the requirement to file a 5-year service improvement plan. *See also*, 47 CFR Section 54.202(a)(1)(i).

In support of its Application, LTE Wireless states the following:

**A. COMPANY OVERVIEW**

LTE Wireless Inc. is a South Dakota corporation whose principal offices are located at 244 5<sup>th</sup> Avenue, Suite W221, New York, New York (NY) 10001. The nature of LTE Wireless's business is the provision of commercial mobile radio service ("CMRS") and of 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. CMRS providers such as LTE Wireless are treated as common carriers by the Federal Communications Commission.

LTE Wireless will not impose credit checks, deposits or contracts. LTE Wireless will engage in advertising campaigns specifically targeted to reach those likely to qualify for Lifeline service, promoting the availability of cost-effective wireless services to this neglected consumer segment. LTE Wireless may also promote the availability of its Lifeline offering by distributing brochures at various state and local social service agencies, community organizations, churches, and unions that have a membership of low-income consumers. LTE Wireless will provide partner organizations and retail vendors with signage to be displayed where Company products are sold, and with printed materials describing the Company's Lifeline program. LTE Wireless will also do on-line marketing which may include social media and other on-line channels. Thus, LTE Wireless will contribute to the expansion of mobile wireless and broadband services for low-income consumers in Missouri.

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

Faizal Hassad – Manager  
LTE Wireless Inc.  
244 5<sup>th</sup> Avenue, Suite W221  
New York, New York (NY) 10001  
(212) 671-0540  
[regulatory@ltewireless.com](mailto:regulatory@ltewireless.com)

With copies to:

William D. Steinmeier  
WILLIAM D. STEINMEIER, P.C.  
2031 Tower Drive  
Jefferson City, MO 65109  
Phone: 573-659-8672  
Email: [wds@wdspsc.com](mailto:wds@wdspsc.com)

The Company's website can be found at <https://ltewireless.com> .

LTE Wireless was not a winning bidder of Connect America Funding.

Pursuant to 4 CSR 240-2.060(1)(C), a Certificate of Authority to transact business in Missouri, issued by the Missouri Secretary of State, is attached hereto and incorporated herein by reference as **Exhibit A**.

**Exhibit B** is an officer's affidavit.

The Company is not an association. LTE Wireless is not certificated or registered by the Missouri Public Service Commission. The Company will not be providing a telecommunications service or IVoIP service as defined by Section 386.020, RSMo.

Upon designation as an ETC, the Company will provide the supported services throughout the State of Missouri and offer Lifeline service to qualified low-income consumers.

**Waiver of PSC Rule.** LTE Wireless requests a waiver of 20 CSR 4240-4.017(1), which requires 60-day prior notice of filing a case. Pursuant to 20 CSR 4240-4.017(1)(D), good cause exists because LTE Wireless has had no communications with the Missouri Public Service Commission regarding any substantive issue related to this filing, as documented in the affidavit attached hereto as **Exhibit B**.

**Compliance with Rules.** LTE Wireless commits to comply with all applicable rules of the Missouri Public Service Commission and of the Federal Communications Commission unless waived by this Commission or the FCC. The Company is compliant with contribution obligations to the federal USF.

**Missouri PSC Jurisdiction Concerning Eligible Telecommunications Carriers.**

Title 47 U.S.C. § 214(e)(2) of the Act provides that a state commission shall upon request designate a common carrier as an eligible telecommunications carrier (“ETC”) for a service area designated by the state commission. Title 47 U.S.C. § 214(e)(1) provides that an ETC shall be eligible to receive universal service support in accordance with section 254 of the Act and shall, in the service area for which the designation is received, offer the services that are supported by federal universal service support mechanisms under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier’s services, and shall advertise the availability of such services and their costs using media of general distribution. The Federal Communications Commission has promulgated a list of the services or functionalities that shall be supported by federal universal service support mechanisms at 47 C.F.R. § 54.101.

For the reasons set forth below, designating LTE Wireless as an ETC throughout the State of Missouri would serve the public interest, convenience and necessity.

**B. LTE WIRELESS WILL PROVIDE ALL SUPPORTED SERVICES**

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 the purchase of wholesale CMRS services from its facilities-based underlying 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.<sup>4</sup> “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.”<sup>5</sup> 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.

## **2. Broadband Internet Access Services**

LTE Wireless LTE Wireless provides Broadband Internet access service (“BIAS”) in

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<sup>4</sup> See *Lifeline and Link Up Reform Order* at ¶ 367.

<sup>5</sup> See *id.* at ¶ 49.

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."<sup>6</sup> 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 that is statewide in scope to allow the Company to provide Lifeline service wherever its underlying, facilities-based provider(s) have wireless coverage. LTE Wireless understands that its service area overlaps with rural carriers in Missouri, but maintains that the public interest factors described below justify its designation in these carriers' service areas, especially because it seeks ETC designation solely to utilize USF funding to provide Lifeline service to qualified low-income consumers. LTE Wireless is not eligible for and does not seek Link-Up or high-cost support.

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."<sup>7</sup> While federal rules (47 U.S.C. §§ 160, 214(e)(5) and

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<sup>6</sup> See 47 C.F.R. § 8.2(a).

<sup>7</sup> See *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, Memorandum Opinion and Order, 16 FCC Rcd 48, 55 (2000).

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.<sup>8</sup> 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.<sup>9</sup>

**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 will engage in advertising campaigns specifically targeted to reach those

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<sup>8</sup> See *In the Matter of Telecommunications Carriers Eligible for Support, Lifeline and Link Up Reform*, WC Docket No. 09-197, WC Docket No. 11-42, Memorandum Opinion and Order, FCC 13-44 (rel. April 15, 2013).

<sup>9</sup> See 47 C.F.R. § 54.207(c).

likely to qualify for Lifeline service, promoting the availability of cost-effective wireless services to this neglected consumer segment. LTE Wireless may also promote the availability of its Lifeline offering by distributing brochures at various state and local social service agencies, community organizations, churches, and unions that have a membership of low-income consumers. LTE Wireless will provide partner organizations and retail vendors with signage to be displayed where Company products are sold, and with printed materials describing the Company's Lifeline program. LTE Wireless will also do on-line marketing which may include social media and other on-line channels.

**E. 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).

**1. Service Commitment Throughout the Proposed Designated Service Area**

LTE Wireless will provide service in Missouri by reselling service which it obtains from 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.

**2. Ability to Remain Functional in Emergency Situations**

In accordance with 47 C.F.R. § 54.202(a)(2), LTE Wireless 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. The Company understands that its Underlying Carriers' networks have access to a reasonable amount of back-up power to ensure functionality without an external power source, are able to reroute traffic around damaged facilities, and are capable of managing traffic spikes resulting from emergency

situations. Through access to the Underlying Carriers' networks, LTE Wireless and its customers benefit from this same functionality.

**3. Commitment to Consumer Protection and Service Quality**

In accordance with 47 C.F.R. § 54.202(a)(3), an ETC applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards. Wireless applicants may satisfy this requirement with a commitment to comply with the Cellular Telecommunications and Internet Association's ("CTIA") Consumer Code for Wireless Service. LTE Wireless hereby commits to comply with the 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 fully cooperate with the Commission to resolve all customer complaints.

**4. 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 has not been subject to enforcement action, and has not been subject to ETC revocation proceedings in any state.

**5. 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 Missouri. LTE Wireless 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.

LTE Wireless allows customers to apply their Lifeline discount to any of its affordable prepaid plans that can be found at [www.ltewireless.com](http://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 customer chooses a plan that includes a payment from the customer 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 lose 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).<sup>10</sup> 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.

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<sup>10</sup> *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>).

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 Missouri 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 with 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 Missouri conducted pursuant to 47 CFR 54.420, as well as a copy of its annual report filed pursuant to 47 CFR 54.422 (i.e., FCC Form 481), and will comply with applicable Commission reporting requirements for Lifeline ETCs.

***Customer Complaints.*** The Company shall comply with applicable law regarding the manner in which customer complaints shall be recorded and maintained.

The following company contact information is provided to the Commission for complaints and/or billing dispute issues:

Faizal Hassad – Manager  
LTE Wireless Inc.  
244 5<sup>th</sup> Avenue, Suite W221  
New York, New York (NY) 10001  
212-290-9010  
[regulatory@ltewireless.com](mailto:regulatory@ltewireless.com)

The Company commits to resolve complaints received by the Commission against the Company. The above-identified contact person will work with the Commission staff for complaint resolution.

#### **I. MISSOURI APPLICATION REQUIREMENTS**

**20 CSR 4240-2.060(1)(K) and (L):** The Company has no pending or final judgments or decisions against it from any state or federal agency or court that involve customer rates or service. In addition, LTE Wireless has no annual report or assessment fees that are overdue.

**20 CSR 4240-31.016:** Pursuant to 20 CSR 4240-31.016 and 20 CSR 4240-2.060, Exhibit B provides the required affidavit under oath and the required Company information was provided in Section A of this Application. To the best of the Company's knowledge, LTE Wireless does not have any pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates within the past three (3) years, and no annual report or assessment fees are overdue. The Company has not obtained any waivers of ETC-related requirements from the FCC.

LTE Wireless LTE Wireless further provides the following information in accordance with **20 CSR 4240-31.016(2)(8):**

Identify any individual or entity having a ten percent (10%) or more ownership interest in the Applicant.

Faizal Hassad

Identify all officers, directors, and other persons, regardless of title, who fill the role of officer or director of the company.

Faizal Hassad, CEO, Secretary, Manager

Identify any company sharing common ownership or management with the applicant that has ever received funds from the federal USF or any state universal service fund.

None

Provide the details of any matter brought in the last ten (10) years by any state or federal regulatory or law enforcement agency against any of the individuals, entities, managers, officers, directors of other companies sharing common ownership or management with the applicant involving fraud, deceit, perjury, stealing, or the omission or misstatement of material fact in connection with a commercial transaction.

None

5. The website containing information about the LTE Wireless services and rates:

[www.ltewireless.com](http://www.ltewireless.com)

LTE Wireless commits to complying with the ETC requirements set forth in 20 CSR 240-31.015 and to notify the Commission of any changes to company contact information in EFIS. To the best of the Company's knowledge LTE Wireless is compliant with contribution obligations to the federal USF.

LTE Wireless does not currently intend to seek support from the Missouri USF or participate in the Disabled program, but reserves the right to seek such participation and support in the future.

#### **J. LTE WIRELESS LIFELINE PLANS**

The Company commits to provide Lifeline discounts consistent with 47 CFR 54.401, 47 C.F.R. § 54.403, and 47 CFR 54.411, and as required by Missouri law. The Company's proposed Lifeline offerings are set out in **Exhibit C** to this Application. These rates are

reasonably comparable to other telephone, IVoIP and broadband rates in Missouri.

**K. DESIGNATING LTE WIRELESS AS A COMPETITIVE ETC WILL SERVE THE PUBLIC INTEREST**

Competition furthers the goal of universal telecommunications service and provides the consumer with a greater choice of providers and service choices, which will in turn result in market-driven prices and quality. Granting the Company ETC status would advance principles of customer service by providing increased competition and is therefore in the public interest. In addition, as a wireless provider, the Company can often serve a larger local calling area than a traditional wireline provider and afford the customer the convenience of telephone mobility.

The designation of the Company as an ETC will offer Lifeline-eligible customers a greater choice of providers for accessing telecommunications services not available to such customers today and should likely expand the participation of qualifying customers in the Lifeline program.

**CONCLUSION**

WHEREFORE, LTE Wireless, Inc. respectfully submits that it has met the requirements for eligibility for designation as an Eligible Telecommunications Carrier (ETC) in the State of Missouri. LTE Wireless respectfully requests that the Missouri Public Service Commission issue an Order granting this Application and designating LTE Wireless as an ETC for Lifeline services in Missouri.

Respectfully submitted,

***/s/ William D. Steinmeier***

William D. Steinmeier, MoBar #25689

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Jefferson City, MO 65109

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COUNSEL FOR LTE WIRELESS, INC.

Dated: December 5, 2025

### **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been served electronically on the PSC Staff Counsel's office (at [staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov)) and on the Office of the Public Counsel (at [opcservice@opc.mo.gov](mailto:opcservice@opc.mo.gov)) on this 5<sup>th</sup> day of December 2025.

***/s/ William D. Steinmeier***

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William D. Steinmeier

**LIST OF EXHIBITS**  
***(Attached as separate pdf files)***

Exhibit A	Missouri Secretary of State Certificate of Authority
Exhibit B	Officer's Affidavit
Exhibit C	Proposed Rates