



May 31, 2023

VIA ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: Docket No. 23-13-TL – Petition for Designation as an Eligible Telecommunications Carrier in the State of Rhode Island for the Limited Purpose of Offering Lifeline Service to Qualified Households
Responses to the Division of Public Utilities and Carriers Data Requests Set 1

Dear Ms. Massaro:

On behalf of DISH Wireless, L.L.C. (“the Company”) attached is the electronic version of the Company’s responses to the Division of Public Utilities and Carrier’s First Set of Data Requests in the above referenced matter. Hard copies will be delivered within twenty-four hours of the electronic filing. The Company reserves the right to amend, revise, and/or supplement any of the original answers it provides hereunder should there be any relevant change in circumstances.

Thank you for your time and attention to this matter. If you have any questions, please contact Sola Lee at (800) 378-7127 x707.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Sola Lee", written over a horizontal line.

Sola Lee

Enclosures

Cc: Docket No. 23-13-TL Service List
Leo Wold, Esq.

CERTIFICATE OF SERVICE

I certify that a copy of the within documents was forwarded by e-mail to the Service List in the above docket on May 31, 2023.

/s/ Kat B. Savage

Kat B. Savage, Esq.

Service List

Name	E-mail distribution list
DISH Wireless, L.L.C., Alison Minea P.O. Box 6655 Englewood, CO 30155	Alison.minea@dish.com Sola.Lee@dish.com
Hinckley Allen & Snyder LLP Robin Main, Esq. Kat Savage, Esq. 100 Westminster Street, Suite 1500 Providence, RI 02903	rmain@hinckleyallen.com ksavage@hinckleyallen.com ehanson@hinckleyallen.com
Division of Public Utilities and Carriers Leo Wold, Esq. 89 Jefferson Blvd. Warwick, RI 02888	Leo.Wold@dpuc.ri.gov Margaret.L.Hogan@dpuc.ri.gov ; John.Bell@dpuc.ri.gov ; Al.Contente@dpuc.ri.gov ; Ellen.Gold@dpuc.ri.gov Machaela.Seaton@dpuc.ri.gov Joel.Munoz@dpuc.ri.gov Thomas.Kogut@dpuc.ri.gov Cynthia.WilsonFrias@puc.ri.gov
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DIV 1-1

Request:

Please explain the relationship/usage of the different forms of the following corporate names used in Dkts. 23-12-TL and 23-13-TL:

- a. "DISH Wireless L.L.C."
- b. "Dish Wireless L.L.C."
- c. "DISH Wireless L.L.C. dba Gen Mobile"
- d. "Kings Peak Wireless L.L.C."

Response:

Please see the below explanations:

- a. "DISH Wireless L.L.C.": This is the legal name of the Company.
- b. "Dish Wireless L.L.C.": This is a different iteration of the above; however, it is not the official format of the Company's name.
- c. "DISH Wireless L.L.C. dba Gen Mobile": This is the Company's full legal name plus the fictitious business name that the Company will utilize to provide Lifeline services in Rhode Island.
- d. "Kings Peak Wireless L.L.C.": This was the Company's name prior to the Company changing it to DISH Wireless L.L.C. This name is no longer used by the Company.

DIV 1-2

Request

For purposes of the Petition in 23-13-TL and the application in 23-12-TL, is the Petitioner correctly identified as "DISH Wireless L.L.C."? If not, please provide the correct designation.

Response:

The full correct name is DISH Wireless L.L.C. dba Gen Mobile.

DIV 1-3

Request:

Will Petitioner file (or has Petitioner filed) to do business as or under the "Gen Mobile" name in Rhode Island? Please explain.

Response:

Yes. Petitioner will file to do business as Gen Mobile if required by the Commission.

DIV 1-4

Request:

Kindly provide the Orders granting DISH Wireless L.L.C. ETC designation in Colorado, New York, Oklahoma and the Order issued by the California Public Utilities Commission authorizing Petitioner to provide lifeline service in California.

Response:

See Attachment DIV 1-4-1, which includes Orders granting ETC designation in the above-identified states, including the newly granted ETC designation by the State of Wisconsin on April 26, 2023.

DIV 1-5

Request:

If issued since the filing of the Petition in 23-13-TL, kindly provide any FCC Order that has been issued granting DISH Wireless L.L.C. ETC designation for the states of Alabama, Connecticut, Delaware, Florida, New Hampshire, North Carolina, and the District of Columbia.

Response:

The Company has not been granted ETC designation in the states listed.

DIV 1-6

Request:

Kindly explain with more particularity how Petitioner will advertise the availability of Gen Mobile-branded voice, text messaging, and broadband services to reach potential Lifeline and tribal land customers in Rhode Island.

Response:

The Company's marketing plan will include advertising the availability of its services and charges in a manner reasonably designed to reach Lifeline-eligible consumers (i.e., using media of general distribution). The Company expects to advertise the availability of its Lifeline service plans through a variety of marketing channels, including informational brochures and flyers, and online and social media channels. In particular, the Company intends to advertise its Gen Mobile-branded Lifeline services to lower-income individuals in Rhode Island, including individuals residing on federally recognized Tribal lands, through its presence in their communities, including storefront or field locations in areas identified as particularly accessible to lower-income individuals in Rhode Island. To reach out to as many Rhode Island consumers in strategic locations identified as particularly accessible to lower-income individuals, the Company will primarily offer Gen Mobile-branded Lifeline services through a network of indirect and independent sales agents. These sales agents will advertise the availability of Gen Mobile-branded Lifeline plans at storefronts or high foot traffic areas in pop-up tents. The Company together with the sales agents will also plan to coordinate or schedule events with local government agencies, non-profits, and community based organizations to distribute more information about Gen Mobile-branded Lifeline offerings. Some of the Company's Lifeline advertising efforts will come from online affiliate marketing campaigns as well. In addition, the Company will comply with the FCC's rules regarding information to be included on materials describing the service, including section 54.405(c).

DIV 1-7

Request:

Kindly provide more detail: (a) as to number of staff, experience, qualifications and processes employed to ensure the information entered on Lifeline applications in Rhode Island is bona fide, (b) about the third party company and the processes that that company employs to provide RTR of Petitioner's Lifeline enrollments; and (c) about any certification the third party company makes to Petitioner about its RTR of Petitioner's Lifeline enrollments.

Response:

Please see responses below:

- (a) DISH Wireless has 9 staff members in the Gen Mobile brand that will be overseeing the Gen Mobile Lifeline Program. Their experiences and qualifications are as follows:
 1. Robert Yap
 - a. Gen Mobile Inc. (acquired by DISH Wireless L.L.C. in 2021), P.O. Box 1243, Redondo Beach, CA 90278, Co-Founder/CEO, 2017-2021
 - b. TruConnect Communications, Inc., 1149 S. Hill Street, Ste. 400, Los Angeles, CA 90012, 2015-2017
 - c. KDDI Corporation, 21241 S Western Ave # 210, Torrance, CA 90501, Chief Legal Officer, 2013-2015
 - d. Total Call International, Inc., 1411 W 190th St #700, Gardena, CA 90248, CLO, 2002-2015
 - e. OPEX Communications, Inc., 3777 Long Beach Blvd. Long Beach, CA 90807, CLO, 2002-2015
 2. Anthony Lombardo
 - a. Gen Mobile Inc. (acquired by DISH Wireless L.L.C. in 2021), P.O. Box 1243, Redondo Beach, CA 90278, Co-Founder/CFO, 2017-2021
 3. Jennifer Lin
 - a. Gen Mobile Inc. (acquired by DISH Wireless L.L.C. in 2021), P.O. Box 1243, Redondo Beach, CA 90278, Co-Founder/VP of Marketing, 2017-2021
 4. Jose Andrade
 - a. Gen Mobile Inc. (acquired by DISH Wireless L.L.C. in 2021), P.O. Box 1243, Redondo Beach, CA 90278, Director of Operations, 2018-2021

- b. TruConnect Communications, Inc., 1149 S. Hill Street, Ste. 400, Los Angeles, CA 90012, Director of Operations, 2016-2018
 - c. OPEX Communications, Inc., 3777 Long Beach Blvd. Long Beach, CA 90807, Sales and Customer Service Manager, 2007-2016
 - d. Total Call International, Inc., 1411 W 190th St #700, Gardena, CA 90248, Telesales and Customer Service Supervisor, 2004-2007
5. Sola Lee
- a. Gen Mobile Inc. (acquired by DISH Wireless L.L.C. in 2021), P.O. Box 1243, Redondo Beach, CA 90278, Senior Counsel, 2017-2021
 - b. TruConnect Communications, Inc., 1149 S. Hill Street, Ste. 400, Los Angeles, CA 90012, Counsel, 2015-2017
6. Vincent Buongiovanni
- a. Sprint (acquired by T-Mobile April 2020), PO Box 4191, Carol Stream, IL 60197, Retail Store Technician, Retail Store Manager, Retail Operations Manager, Performance & Regional Operations Manager, Operations Manager, and National Sales Manager for Assurance Wireless, 1997-2021

DISH Wireless will train relevant employees, agents, and representatives (Lifeline agents or enrollment representatives) to ensure that only qualified, non-duplicate, Lifeline eligible subscribers are enrolled in the program and will also rely on the National Verifier or state eligibility administrators, where applicable, to determine eligibility. All Lifeline sales agents must pass a Lifeline training that includes information about the federal Lifeline program and any Commission specific requirements, including compliance training. DISH Wireless will ensure that its enrollment representatives will be registered with DISH Wireless and with the Representative Accountability Database (“RAD”) before the Lifeline agents can submit orders and enroll customers in DISH Wireless’s Lifeline service. All enrollments performed in-person will be completed electronically in real-time. The use of “paper forms” will be prohibited. As applicable, DISH Wireless will follow the procedures and additional rules of the Commission and states’ commissions.

- (b) DISH Wireless will use the Lifeline enrollment application software of Emerios Enterprise Services Inc. (“Emerios”), or similar software, for its in-person and online Lifeline customer enrollments. The Emerios Lifeline enrollment application works on a wireless device, tablet, or computer and, in conjunction with the National Verifier, provides the required disclosures and collects customer information, identity documentation, and, if necessary due to a National Verifier eligibility denial, advises the customer on how to upload proof of eligibility to the National Verifier. The Emerios web

application will also redirect applicants to the National Verifier, if needed, to ensure that the applicant completes all certifications and takes all steps required by the National Verifier (e.g., one per household confirmation). The Emerios application will also check DISH Wireless's designated service territory in the state and underlying carrier coverage area and, if coverage is applicable, will conduct the NLAD enrollment.

Lifeline agents will have to log in to the Emerios software with a unique username and password to enroll customers and to ensure that the customer information is safeguarded against potential identity fraud. This also allows for the tracking of each Lifeline agent's enrollments. When a Lifeline agent uses the Emerios software, a Lifeline agent will have to sign an agreement to follow all rules and requirements with respect to assisting an applicant with the Lifeline enrollment, including Lifeline program rules and confidentiality obligations. If the National Verifier cannot determine a prospective subscriber's eligibility for Lifeline by accessing income or program eligibility databases, Lifeline agents may assist applicants in submitting the documentation to the National Verifier.

In addition, for applications completed with the assistance of an enrollment representative, the submitted Emerios applications will be sent electronically for review by real time review agents ("RTR agents") who are not paid on a commission basis. The RTR agents will review all documentation to confirm that it supports the related application. All information and scans, if applicable, collected will be electronically transmitted in encrypted form via the Emerios software.

When the reviews described herein are completed, approved customers will be enrolled and will receive a handset or SIM to be activated as discussed below. DISH Wireless has also engaged with various third party companies to provide additional checks on the customers' eligibility and applications for the Lifeline program.

- (c) DISH Wireless has agreements in place with the third party companies, with regard to the RTR of the Company's Lifeline enrollments and they are highly experienced in RTR and Lifeline enrollments.