



**STATE OF RHODE ISLAND**

**DIVISION OF PUBLIC UTILITIES & CARRIERS**

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**MEMORANDUM**

**TO:** Luly Massaro, Commission Clerk  
Rhode Island Public Utilities Commission

**FROM:** Jon G. Hagopian, Esq.  
RI Division of Public Utilities & Carriers RI Division of Public  
Utilities & Carriers

**DATE:** February 14, 2024

**RE:** Docket No. 24-03-TL, IM Telecom LLC d/b/a Infiniti Mobile –  
Petition for Designation as an Eligible Telecommunications Carrier  
(ETC) Designation

On January 4, 2024, IM Telecom, LLC d/b/a Infiniti Mobile (Infiniti) filed with the Rhode Island Public Utilities Commission (Commission) an application for designation as an Eligible Telecommunications Carrier (ETC) in the state of Rhode Island for the limited purpose of offering Lifeline Services to qualified households. Infiniti seeks ETC designation solely to provide subsidized Lifeline wireless service to eligible/qualifying low-income consumers in the state. Infiniti does not seek access to funds from the federal Universal Service Fund (USF), nor does it seek “high-cost” support from the federal high-cost program. Infiniti’s submission was made pursuant to Section 214(e)(2) of the Communications Act of 1934, Sections 54.101-54.207 of the Rules of the Federal Communications Commission (FCC), and the applicable Commission rules and regulations. Although the Commission is herein tasked with ETC designation, these federal laws/rules provide the basis for the requisite requirements and standards by which the common carrier is to be vetted and a determination on ETC designation is made.

In support of designation as an ETC in Rhode Island, Infiniti included with its application a comprehensive overview of the company/affiliates, its industry experience, past practice, regulatory record, and proposed dealings in Rhode Island. Through its explanatory papers, Infiniti asserts that it satisfies the requirements for designation as an ETC pursuant to FCC Rules 47 C.F.R. §54.201 and 47 C.F.R. §54.202(a), and that such designation is in the public interest. As additional support, Infiniti provided documentary evidence (Exhibits 1-6) that includes (1) Infiniti's President's certification; (2) FCC Approved Revised Compliance Plan; (3) Coverage Area; (4) Proposed Lifeline Offering (i.e.: Customer Package Plan—Minutes & Data Customer Emergency Services—911); (5) Sample Advertisement; and (6) Infiniti's Management Biographies.

The Division of Public Utilities and Carriers (DPUC) has carefully reviewed Infiniti's application materials, as well as the applicable federal and state regulatory requirements. All told, the DPUC's review and verification of the contents of Infiniti's application, coupled with an independent review of Infiniti/affiliates' industry, consumer, financial and regulatory history and status, yields no major areas of concern as it relates to the limited ETC status sought by the Commission in this docket. Further, the DPUC is not aware that any comments in opposition to the filing were submitted. The DPUC finds that Infiniti's application satisfies the threshold regulatory criteria, and it recommends that the Commission grant the wireless ETC designation without the need for additional regulatory vetting.

Respectfully submitted,  
Division of Public Utilities and Carriers



Jon G. Hagopian, Esq.  
Chief of Legal Services

cc: Service List