

**PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

**Date of Issuance: July 16, 2025**  
**Communications Division**

**RESOLUTION T-17882**  
**June 26, 2025**

**R E S O L U T I O N**

**RESOLUTION T-17882. Application of Go MD USA, LLC (U-4576-C) for Designation as an Eligible Telecommunications Carrier in California.**

PROPOSED OUTCOME: Rejection of Go MD USA's request for ETC designation.

SAFETY CONSIDERATIONS: There are no safety considerations associated with this resolution.

ESTIMATED COST: There are no costs associated with this resolution.

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**SUMMARY**

This Resolution denies the request of Go MD USA, LLC, (U-4576-C) (Go MD USA) for designation as an Eligible Telecommunication Carrier (ETC). Go MD USA has not satisfied the requirements for ETC designation pursuant to Resolution T-17002. The CPUC finds that Go MD should not be designated at this time as an ETC for the purpose of participating in the federal Lifeline program to provide talk, text, and data, to qualifying low-income households in Go MD USA's service areas. Go MD USA is a reseller operating under wholesale agreements with AT&T and T-Mobile, its underlying facilities-based wireless carriers in California.

**BACKGROUND**

Go MD USA, LLC, provides commercial mobile radio services (CMRS) and is designated as a Cellular Retail Reseller by the California Public Utilities Commission. On August 6, 2024, Go MD USA filed Tier 3 Advice Letter No 2 (Application) seeking designation as an Eligible Telecommunications Carrier for the limited purpose of providing federal Lifeline service under the brand name "GO MD USA Mobile," and

other brand names,<sup>1</sup> to qualifying consumers in California located within the service territories served by the company's underlying wireless carriers, AT&T Wireless and T-Mobile USA.

Go MD USA, LLC must satisfy all federal and state ETC requirements to receive an ETC designation.

### **Federal ETC Designation Requirements**

In order to receive federal universal service support, an applicant must be designated as an ETC. Section 254(e) of the Communications Act (the Act), as amended, states that "only an eligible telecommunications carrier under section 214(e) shall be eligible to receive specific federal universal service support."<sup>2</sup>

The Act gives state commissions the primary responsibility for granting ETC designations to companies operating in their states. Section 214(e)(2) states that, "[u]pon request and consistent with the public interest, convenience, and necessity, the state commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated by the state commission" so long as the requesting carrier meets the requirements of Section 214(e)(1).

Accordingly, Section 214(e)(1) provides that a common carrier designated as an ETC must offer services supported by the federal Universal Service Fund (USF) throughout its designated service area either by using its own facilities, resale, or by a combination of its own facilities and resale of another carrier's services. However, the Federal Communications Commission (FCC) has since amended its rules regarding the designation of ETCs that deliver services exclusively by resale, which now also requires a Lifeline Compliance Plan approved by the FCC.<sup>3</sup>

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<sup>1</sup> See Go MD USA Advice Letter 2. Other brand names include Open Mobile Telehealth Mobile Network. At p. 6

<sup>2</sup> 47 C.F.R. §§ 54.400 *et seq.* contains the Federal Communications Commission's (FCC) Lifeline rules issued to implement § 254 of the Act. Section 54.401 defines Lifeline as a non-transferrable retail service offering for which qualifying low-income consumers pay a reduced charge for voice telephony service after applying the federal Lifeline support amount.

<sup>3</sup> FCC DA 12-314 states: "Non-facilities-based carriers designated after December 29, 2011 will not be eligible to receive universal service support for Lifeline service in those states until the Bureau approves their [Lifeline] compliance plans." WC Docket Nos. 09-197, 11-42, February 29, 2012. See [Lifeline Compliance Plans & ETC Petitions | Federal Communications Commission](#).

An ETC must advertise the services and the related charges using advertising media of general distribution throughout the designated service area. Advertising must include the availability of federal Lifeline services in a manner reasonably designed to reach those likely to qualify for those services.

In addition to meeting the public interest standard, the FCC rules require that a carrier requesting ETC designation must:

1. Certify that it will comply with the service requirements applicable to the support that it receives;
2. Submit a five-year plan that describes proposed improvements or upgrades to the applicant's network throughout its proposed service area;<sup>4</sup>
3. Demonstrate its ability to remain functional in emergency situations;<sup>5</sup>
4. Demonstrate that it will satisfy applicable consumers and meet service quality standards;
5. Demonstrate that it is financially and technically capable of providing the federal Lifeline service; and
6. Submit information describing the terms and conditions of any voice telephone service plans offered to federal Lifeline participants.<sup>6</sup>

### **California ETC Designation Requirements**

The CPUC also adopted procedures and guidelines for processing ETC applications. In Resolution T-17002 (May 25, 2006), the CPUC adopted *The Comprehensive Procedures and Guidelines for ETC Designation and Requirements for ETCs* that are consistent with FCC Universal Service Order 97-157<sup>7</sup> regarding the designation of a communications service provider as a qualified ETC. Pursuant to this Resolution, applicants seeking ETC designation in California are required to provide the following:

1. A description of the proposed service offerings and attached service area maps;
2. A description of the advertising plan(s);
3. A statement of commitment to provide service;
4. Submission of the 2-year service quality improvement plan;
5. A showing of the ability to remain functional;
6. A statement of commitment to consumer protection;

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<sup>4</sup> This requirement is only applicable to ETC applicants requesting to participate in federal High-Cost subsidy programs. Go MD USA's AL 2 ETC application does not seek this authority.

<sup>5</sup> For this condition, Go MD USA must submit annual Resiliency Plans per Decision (D).21-02-029

<sup>6</sup> 47 C.F.R. § 54.202(a).

<sup>7</sup> See *In the Matter of Federal-State Joint Board on Universal Service*, Report and Order, CC Dkt. 96-45 (FCC 97-157), released May 8, 1997.

7. Demonstration that a carrier's usage plan is comparable to that of the incumbent LEC in the proposed service area; and
8. A public interest determination.

## DISCUSSION

In its Application, Go MD USA is seeking designation as an ETC to participate in the federal Lifeline subsidy program and does not intend to draw funds from the federal High-Cost Fund program. Therefore, it must adhere to the comprehensive procedures and guidelines for ETC Designation, attached as Appendix A of Resolution T-17002.<sup>8</sup> Since Go MD USA is not applying for funding from the federal High-Cost Fund program, it is not required to comply with all the requirements of Appendix B of Resolution T-17002, *Comprehensive Reporting Requirements for ETCs to receive Federal High-Cost Support*.

Communications Division (CD) Staff conducted a due diligence review and analysis of Go MD USA's application for compliance with requirements outlined in Resolution T-17002. CD Staff identified several areas where Go MD's application raises concerns about its fitness for being granted ETC designation for serving California consumers.

1. ETC applicants are required to include "a List of Geographic Service Areas and a corresponding map in .shp format showing the proposed service area. For wireless petitioners, the map should identify the location of cell sites and shade the area where the carrier provides commercial mobile radio service or similar service."<sup>9</sup> Go MD USA has indicated its intention to serve all of California customers who are located in the service areas covered by its underlying wireless carriers, AT&T and T-Mobile. While Go MD USA provided a list of zip codes that covered several pages,<sup>10</sup> it failed to include the required map for wireless carriers.<sup>11</sup>
2. ETC applicants are required to include "a list of services which the carrier proposes not to provide or for which the carrier is seeking an extension of time"<sup>12</sup>. Go MD USA has identified services it intends to offer, but it failed to

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<sup>8</sup> Resolution T-17002, Ordering Paragraph (OP) 1.

<sup>9</sup> T-17002 Appendix A Section 1, as well as FCC Report and Order 97-157. May 8, 1997.

<sup>10</sup> Go MD USA Advice Letter 2, Exhibit 3: California Coverage Area Zip Codes.

<sup>11</sup> T-17002 Appendix A, Section I-A

<sup>12</sup> FCC Report and Order 97-157. May 8, 1997.

specify which services it will not provide and/ or is seeking an extension of time to comply with the requirement.<sup>13</sup>

3. ETC applicants are required to apply for “a waiver of the requirement that an ETC not disconnect Lifeline customers for non-payment of a toll”<sup>14</sup>. Go MD USA failed to provide this waiver or indicate its intention to apply for such waiver.
4. ETC applicants are required “to provide equal access if all other ETCs in the service area relinquish their designations pursuant to section 214 (e)(4) of the Act.”<sup>15</sup> Go MD USA failed to indicate this requirement in its Application and how it will comply with it.<sup>16</sup>
5. Go MD USA fails to demonstrate that it offers a local usage plan comparable to the one offered by the Incumbent Local Exchange Carrier (“ILEC”) in the service areas for which it seeks ETC designation. Go MD USA did not provide service offering comparisons to those of competitors in any of the zip codes listed in its Application, Exhibit 3. Furthermore, Go MD USA did not demonstrate that a) the ETC designation will increase consumer choices; b) the advantages and disadvantages of its service offerings; and c) the absence of cream skimming.

Pursuant to FCC DA 12-314,<sup>17</sup> Go MD USA must have an FCC-approved Lifeline Compliance Plan in order to attain ETC designation, which it does not.<sup>18</sup> In addition, Go MD USA failed to demonstrate its ownership of any facilities in California. Instead in its Application, Go MD USA states, “[n]ow, using its subcontracted licensed wireless spectrum assets, Go MD is building the nation’s first virtualized, cloud-native, Open Mobile Telehealth Mobile Network - based 5G broadband network. To facilitate the buildout, Go MD USA will be entering into multi-year agreements with multiple partners.”<sup>19</sup> This statement does not address whether Go MD USA currently owns any operational facilities in California.

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<sup>13</sup> T-17002 Appendix A, Section I-C.

<sup>14</sup> T-17002 Appendix A, Section I-D.

<sup>15</sup> FCC Report and Order 97-157. May 8, 1997.

<sup>16</sup> T-17002 Appendix A, Section II-F.

<sup>17</sup> FCC DA 12-314, WC Docket Nos. 09-197, 11-42, February 29, 2011, WIRELINE COMPETITION BUREAU PROVIDES GUIDANCE FOR THE SUBMISSION OF COMPLIANCE PLANS PURSUANT TO THE LIFELINE REFORM ORDER. <https://docs.fcc.gov/public/attachments/DA-12-314A1.pdf>

<sup>18</sup> FCC DA 12-314. January 29, 2012, at p. 1. Also see FCC website for list of carriers that does not include Go MD USA, LLC, [Lifeline Compliance Plans & ETC Petitions | Federal Communications Commission](#).

<sup>19</sup> Go MD USA’s Advice Letter 2, at 6.

Pursuant to section 214 (e)(1)(A), “in order to be designated as an ETC, a carrier must “offer the services that are supported by Federal universal service support mechanisms...either using its own facilities or a combination of its own facilities and resale of another carrier’s services ....”<sup>20</sup> Instead of demonstrating how it will offer the services, Go MD USA claims that “there is no need for GO MD USA to obtain an approved FCC Compliance Plan” because it has contracted to resell services using AT&T and T-Mobile facilities.<sup>21</sup> By contrast, FCC rules dictate that wireless resellers that do not have their own facilities and are seeking ETC designation to provide Lifeline services, must obtain Lifeline Compliance Plan approval from the FCC.<sup>22</sup> Go MD USA failed to meet this requirement because it has neither an approved Lifeline Compliance Plan, nor any facilities in California.

Go MD USA’s Application was suspended twice, first until January 2, 2025, and again until July 1, 2025. Staff worked with GO MD USA to address the inadequacies in the ETC designation requirements of the Application. On December 16, 2024, in response to Staff communication, Go MD USA’s contact person informed Staff via email that they would provide Staff a letter on or around December 18<sup>th</sup> regarding GO MD USA’s position on owning facilities and the FCC Lifeline Compliance Plan. However, Staff has not received any such communication from Go MD USA to date.

Go MD USA must satisfy all federal and state ETC requirements to receive an ETC designation. For reasons discussed above, CD Staff recommends that Go MD USA’s Advice Letter No 2 seeking ETC designation be denied without prejudice. Staff determined that it would not be in the public interest to approve their ETC designation at this time.

### **Notice/Protests**

Go MD USA served its Tier 3 Advice Letter filing via email to all parties on the ETC service list and the Advice Letter appeared in the Commission’s Daily Calendar on August 9, 2024. No protests or responses were filed with respect to this application.

### **COMMENTS**

In compliance with P.U. Code § 311(g), the Commission emailed a notice letter on May 22, 2025, informing all parties on the Eligible Telecommunications Carrier service list of

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<sup>20</sup> 41 U.S.C. § 214(e)(1)(A)

<sup>21</sup> Go MD USA’s AL 2, IV: C.

<sup>22</sup> DA 12-314, Released by FCC February 29, 2012, “Guidance for the Submission of the Compliance Plans Pursuant to the Lifeline Reform Order. [120191.doc](#)

the availability of this Resolution for public comments at the Commission's website [www.cpuc.ca.gov](http://www.cpuc.ca.gov). The notice letter also informed parties that the final confirmed Resolution adopted by the Commission will be posted and available at the same website. The Commission received no public comments.

## **FINDINGS AND CONCLUSIONS**

1. Go MD USA, LLC, (Go MD USA) provides commercial mobile radio services (CMRS) and is designated as a Cellular Retail Reseller by the California Public Utilities Commission (CPUC).
2. On August 6, 2024, Go MD USA filed Advice Letter No 2 seeking ETC designation for the limited purpose of providing federal Lifeline service under the brand name "GO MD USA Mobile," and other brand names,<sup>23</sup> to qualifying California consumers subject to the service areas served by the company's underlying wireless carriers, AT&T and T-Mobile.
3. Go MD USA served its Application filing via email to all parties on the ETC service list, and the Application appeared in the Commission's Daily Calendar on August 9, 2024. No protests were filed.
4. Go MD USA's Application did not fully comply with the procedures and guidelines for ETC designation established in Resolution T-17002.
5. Go MD USA's Application was suspended two times, first to January 2, 2025, and again to July 1, 2025. During this time, Staff worked with the company to address the ETC designation requirement inadequacies with Go MD USA's ETC application. Go MD USA indicated it would provide Staff with a letter on or around December 18<sup>th</sup>, but Staff has not received any such correspondence from Go MD USA.
6. Go MD USA failed to comply with the Geographic Services Areas map requirement, failing to supply a map in .shp format showing the proposed service area.
7. Go MD USA did not provide an indication of whether it plans to apply for a waiver of the requirement that as an ETC it will not disconnect Lifeline customers for non-payment of toll costs.

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<sup>23</sup> Go MD USA AL 2, II. Company Overview.

8. Go MD USA failed to discuss or commit to providing equal access if all other ETCs in the service area relinquish their designations pursuant to section 214 (e)(4) of the Act.
9. Go MD USA failed to demonstrate that it offers a local usage plan comparable to the ones offered by the Incumbent Local Exchange Carriers (ILECs) in the service areas for which it seeks ETC designation.
10. Go MD USA failed to demonstrate that : a) the ETC designation will increase consumer choices; b) the advantages and disadvantages of its service offerings; and c) the absence of cream skinning pursuant to Resolution T-17002.
11. Go MD USA failed to demonstrate to the CPUC that it obtained a Lifeline Compliance Plan approval from the FCC.
12. Go MD USA failed to demonstrate current ownership of any network facilities in California.
13. CD Staff recommends that Go MD USA, LLC's Tier 3Advice Letter, seeking ETC designation, be denied without prejudice.
14. On May 22, 2025, the Commission emailed a draft of this resolution to the Eligible Telecommunications Carrier service list for public comments.



**THEREFORE, IT IS ORDERED THAT:**

The request of Go MD USA, LLC, to be designated as an Eligible Telecommunications Carrier in California is denied without prejudice.

This Resolution is effective today.

/s/ RACHEL PETERSON

Rachel Peterson  
Executive Director

ALICE REYNOLDS  
President

JOHN REYNOLDS  
DARCIE L. HOUCK  
KAREN DOUGLAS  
MATTHEW BAKER  
Commissioner