



**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

D.T.C. 23-1

March 20, 2025

Petition of DISH Wireless, LLC for Limited Designation as an Eligible Telecommunications Carrier (ETC)

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**SECOND SET OF INFORMATION REQUESTS BY THE  
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE  
TO DISH WIRELESS, LLC**

Pursuant to 207 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Cable ("Department") submits to DISH WIRELESS, LLC the following information requests:

Instructions

The following instructions apply to this set of information requests.

1. All answers should be filed with the Department by the close of business on June 16, 2025
2. Unless otherwise stated, each request should be answered in writing and include: the case docket number; a reference to the request number; the name of the person responsible for the answer; and a recitation of the request.
3. The term "affiliate" means a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, DISH. For purposes of this definition, the term "own" means to own an equity interest (or the equivalent thereof) of more than 10 percent.
4. The term "DISH" means DISH Wireless, LLC d/b/a Gen Mobile Wireless and its corporate predecessors, agents, officers, employees, and assigns.
5. The term "Amended Petition" means DISH amended application for designation as an ETC which the Department received on December 5, 2024.
6. The term "ETC" means eligible telecommunications carrier.
7. The term "FCC" means the Federal Communications Commission.
8. The term "USF" means Universal Service Fund.

9. The term “USAC” means the Universal Service Administrative Company.
10. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, press releases, handwritten and/or typed notes, records, reports, bills, checks, articles from journals and/or other sources, legal filings, e-mails, SMS text messages, blog postings, RSS feeds, web pages, social media postings such as Facebook and Twitter, and/or other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
11. The term “provide complete and detailed documentation” means: provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used by DISH in developing the projections or estimates.
12. Requests shall be deemed continuing so as to require further supplemental responses if DISH and/or its witnesses receive or generate additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
13. If any of these requests are ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.

### Requests

- D.T.C. 2-1 State for the record if there are any changes to DISH's responses to the First Set of Information Requests issued on March 23, 2023.
- DT.C. 2-2 Describe DISH's plans for providing customer service in Massachusetts, including but not limited to:
- A. DISH's internal standards for responding to and resolving customer inquiries and complaints (e.g., expected response times, manner of communication).
  - B. Whether DISH plans to use any artificial intelligence tool in its customer service operation.
  - C. The organization of DISH's customer service team for Lifeline related complaints including which areas of management are responsible for Massachusetts.
- D.T.C. 2-3 Describe, in narrative form, the types of complaints DISH receives from Lifeline subscribers in other jurisdictions where it operates as an ETC and the company's procedures on how it handles each of these complaints.
- D.T.C. 2-4 Describe DISH's policy regarding customers returning equipment.
- D.T.C. 2-5 State whether DISH will impose an activation fee, change fee, early termination fee, or any other service fee for any of its Lifeline services. Provide a detailed description of any such fee(s) and explain whether the same or similar fee is imposed on non-Lifeline subscribers.
- D.T.C. 2-6 State whether DISH's Lifeline subscribers incur roaming charges. If so:
- A. State whether Lifeline subscribers will be notified before they incur roaming charges;
  - B. State whether Lifeline subscribers can terminate the call before incurring such roaming charges;
  - C. Describe in narrative form how roaming charges will apply to DISH's Massachusetts Lifeline subscribers; and
  - D. State whether additional charges will be incurred for 911 calls made while roaming.
- D.T.C. 2-7 Describe any free account management tools available to DISH's lifeline subscribers in Massachusetts, including web applications.

- D.T.C. 2-8 Identify underserved Lifeline eligible groups DISH has identified in Massachusetts and any outreach plan for such groups.
- D.T.C. 2-9 Provide copies of agreements with all underlying carriers upon which DISH will rely upon to provide prepaid wireless telecommunications services to Lifeline customers in Massachusetts.
- D.T.C 2-10 Describe how and when a Massachusetts Lifeline customer will be notified of any changes or updates to the applicable terms and conditions.
- D.T.C. 2-11 State if DISH as ever:
- A. Formally relinquished, or unilaterally abandoned, or withdrawn an ETC designation in any state or other jurisdiction;
  - B. Experienced dismissal (with or without prejudice) of an application or petition for ETC designation;
  - C. Had an ETC designation permanently revoked, rescinded, suspended, or otherwise “terminated” in any state or jurisdiction; and
  - D. Explain the reason(s) for and circumstances behind each such event or occurrence falling under the foregoing categories.
- D.T.C. 2-12 State whether the FCC, any state utilities commission, or any other government agency has, to date, rendered or entered a finding, criminal conviction (including plea agreements), or civil judgement (including money judgements) against DISH or its affiliates (or against the executives or managers of DISH or its affiliates). Provide a copy of any such finding, conviction, plea agreement, or civil judgement entered against DISH, its executives, or managers.
- D.T.C 2-13 State whether DISH has any ongoing litigation related to its Lifeline service in any state. Provide a summary and explanation or any such instance.
- D.T.C. 2-14 Provide a complete list of other DISH prepaid and Lifeline wireless brands.
- D.T.C. 2-15 State whether DISH is subject to any outstanding tax liabilities, late payments, or other liabilities due and owing to any government and/or quasi-public entities in any other jurisdictions. If so, provide complete and detailed documentation identifying the amounts owed and explaining the reasons for such arrears.
- D.T.C. 2-16 Provide a Certificate of Good Standing from DISH’s state of incorporation.
- D.T.C. 2-17 State how long it would take DISH to offer Lifeline service in Massachusetts from the date of approval if the Petition is granted by the Department.
- D.T.C. 2-18 Provide a list of countries that Lifeline subscribers can make calls to and, if applicable, the rate per minute for each of these countries.

- D.T.C 2-19     Elaborate, in detail, on how DISH’s offerings are different from what is currently offered in Massachusetts at the present time.
- D.T.C. 2-20     Provide a delineation, if possible, of where DISH will use AT&T’s service versus T-Mobile’s service.
- D.T.C. 2-21     Provide the most recent cellular coverage map, for:
- a) DISH’s own cellular facilities, and
  - b) DISH’s underlying carriers.
- D.T.C. 2-22     Provide the most recent list of supplemental or “top-up” prepaid services available to DISH Lifeline customers including prices.
- D.T.C. 2-23     Provide the model name of any equipment DISH expects to offer to Massachusetts Lifeline customers at no charge.
- D.T.C. 2-21     Provide DISHs “Bring Your Own Device” (BYOD) policy for Massachusetts Lifeline customers.
- D.T.C. 2-22     Refer to the Petition at Page 4. DISH describes GenMobile as available in “10,000 retail establishments nationwide.” Identify any major GenMobile retail partnerships in Massachusetts and how many Massachusetts retailers can fulfill GenMobile refill requests.
- D.T.C. 2-23     Provide a copy of DISH’s most recent Massachusetts state 911 Department monthly surcharge fee submission form.