

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

DISH Wireless L.L.C.)
Petition for Designation as an Eligible)
Telecommunications Carrier in the)
Commonwealth of Massachusetts for) D.T.C. Docket No. 23-1
the Limited Purpose of Providing)
Lifeline Service to Qualifying)
Customers)

**AMENDMENT TO PETITION OF DISH WIRELESS L.L.C. FOR
DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER IN
THE COMMONWEALTH OF MASSACHUSETTS FOR THE LIMITED PURPOSE OF
OFFERING LIFELINE SERVICE PROGRAM TO QUALIFIED HOUSEHOLDS**

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November 17, 2025

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Limited Purpose of Providing Lifeline)
Service to Qualifying Customers)
)

I. INTRODUCTION

DISH Wireless L.L.C. dba Gen Mobile (“DISH Wireless”), by its undersigned counsel, filed its petition for Designation as an Eligible Telecommunications Carrier (“ETC”) in the Commonwealth of Massachusetts on December 5, 2024 (the “Petition”). DISH Wireless seeks ETC designation for the limited purpose of providing Lifeline service under the brand name “Gen Mobile” to qualifying Massachusetts consumers, including those consumers residing on federally recognized Tribal lands. DISH Wireless, and its successor affiliate company, Boost SubscriberCo L.L.C., hereby submits this amendment to its Petition as set forth herein.

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

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Vice President and Associate General Counsel
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II. AMENDMENTS TO THE PETITION

A. New Entity

DISH Wireless recently entered into an agreement with its successor affiliate company, Boost SubscriberCo. L.L.C., whereby certain assets including the Gen Mobile brand and operations have been assigned to it. The Gen Mobile brand will remain the brand to provide Lifeline services in Massachusetts. As such, DISH Wireless together with Boost SubscriberCo L.L.C. respectfully request that the Massachusetts Department of Telecommunications and Cable (the “Department”) recognize Boost SubscriberCo, L.L.C. dba Gen Mobile (hereinafter, the “Company” or “Gen Mobile”) as the petitioner of the Petition effective immediately.¹

B. Transition To Hybrid MNO

Second, pursuant to a new arrangement with AT&T, the Company is transitioning to a “hybrid” mobile network operator (“MNO”). In this model, the Company continues to control its own core network facilities, which include all the hardware and software components necessary to manage and control the wireless network—essentially, the brain behind the radio access network. The Company will route customer traffic to its core using AT&T’s radio access network at the edges, with the Company’s core controlling the routing and transmission of traffic to its destinations. This setup allows the Company to maintain full control over its core network infrastructure, routing of wireless traffic, and the overall customer experience. Moreover, traffic destined for other carriers and traffic originating with other carriers will be routed by the Company using its interconnection arrangements. The Company thus controls the physical components of the network used for the transmission or routing of the services that will be designated for support. Like any MNO, the Company has the ability to introduce new offers,

¹ See Exhibit 1, attached hereto, for updated corporate organization chart for DISH Wireless and the Company.

products, and services without relying on a competitor's facilities, significantly enhancing the subscriber experience. This will allow the Company to immediately introduce new Lifeline options for consumers in Massachusetts as soon as the Department approves this Petition. Accordingly, pursuant to 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.101(b), the Company will offer Gen Mobile-branded services that are designated for federal universal support using its own facilities or a combination of its own facilities and/or resale of another carrier's services.

III. CONCLUSION

The AT&T transaction resulted in retail wireless services, including Gen Mobile Lifeline services, being housed within the Company instead of DISH Wireless. Therefore, the Company requests an amendment to, and name change of, the Petition.

Notwithstanding the updates of this amendment, the evidence submitted during the proceedings of this Petition remain the same and consistent with the federal and state requirements for ETC designation for Lifeline support, respectively, under Section 214(e)(2) of the Communications Act of 1934, as amended;² Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission;³ and the applicable Department the rules and regulations.

Gen Mobile remains committed to bridging the digital divide by providing Lifeline services to the underserved and unserved households in Massachusetts. Approving this Petition and designating Gen Mobile as an ETC would advance this commitment and serve the public interest. The ETC designation of Gen Mobile will serve the public interest by expanding

² 47 U.S.C. § 214(e)(2).

³ 47 C.F.R. §§ 54.101-54.207.

Lifeline services for qualified customers, fostering competition, and having desirable effects on the Massachusetts Lifeline markets by making these services readily available and accessible.

Gen Mobile respectfully submits this Amendment to be incorporated to its Petition for designation as an ETC in the Commonwealth of Massachusetts.

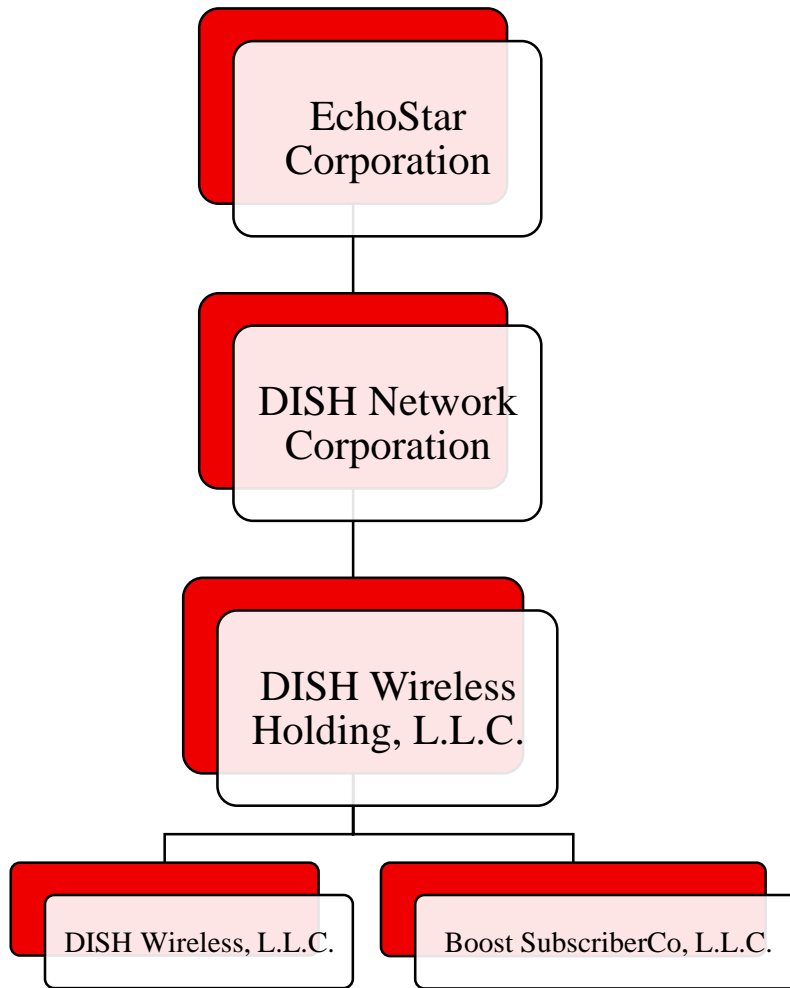
WHEREFORE, Gen Mobile respectfully requests that the Department designate Gen Mobile as an ETC in the Commonwealth of Massachusetts for the purpose of participating in the Lifeline program.

Respectfully submitted,

/s/ Alison Minea
Alison Minea
Gen Mobile

November 17, 2025

EXHIBIT 1: UPDATED CORPORATE ORGANIZATION CHART



COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

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CERTIFICATE OF SERVICE

I, Sidney Silver, hereby certify that on November 17, 2025, I served a true and correct copy of the Amendment by electronic mail, in accordance with the requirements of 207 C.M.R. 1.05(1), to the following service list:

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/s/Sidney Silver
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