

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

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

**RESPONSE TO THE THIRD SET OF INFORMATION REQUESTS  
FROM THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE  
BY DISH WIRELESS L.L.C. D/B/A GEN MOBILE**

Pursuant to the Third Set of Information Requests from the Department of Telecommunications and Cable (“Department”) for Information to DISH Wireless L.L.C. (“DISH Wireless”) dated January 22, 2026 in the above-captioned matter, DISH Wireless files, together with its affiliate company, Boost SubscriberCo L.L.C. (“BSC”), this response to Department Requests D.T.C. 3-1 through 3-6. Unless otherwise noted, Robert Yap, Senior Vice President, is the sponsor to the answers to the Department Request and can vouch for the truth of the answer. DISH Wireless 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.

## Requests

**D.T.C. 3-1     Elaborate on how DISH will continue to control its own core network facilities given the assignment of certain DISH assets to Boost with a detailed explanation of how it controls:**

- A.     Hardware, including any cellular antenna assets; and,**
- B.     Software components.**

DISH 3-1     The assignment of retail assets to BSC, including the Gen Mobile brand was undertaken as part of an internal *pro forma* change under both entities' ultimate parent, EchoStar Corporation. Separate from that *pro forma* event, and due to other intervening events,<sup>1</sup> wireless service provided to BSC's customers have been transitioned to a "hybrid" Mobile Network Operator ("MNO") model. In this model, BSC 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.

- A.     Hardware: BSC customer traffic is routed via AT&T's cell sites. BSC maintains ownership and control of the complex physical network architecture of the Core. The BSC Core connects to AT&T's Radio Access Network through "core-to-core" connections utilizing the 3GPP standard S8 Home Roaming (S8HR) interface.
- B.     Software: BSC retains full control of its software-based core operations. The Core runs on the Amazon Web Service system, and BSC has a vendor relationship with Amazon. This cloud-native 5G core network allows BSC to own all parts of the customer experience, including tracking network issues at the customer level, owning and provisioning customers (including phone numbers), seeing data and usage at the customer level, and managing BSC's own business and operations support systems. ("BSS/OSS").

**DT.C. 3-2     Elaborate on any changes, with respect to the customer experience, that will result from the assignments of certain DISH assets to Boost.**

DISH 3-2     There will be no impact to the customer experience resulting from the internal *pro forma* assignment of certain DISH Wireless Assets to BSC.

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<sup>1</sup> Now pending before the FCC are two applications seeking consent for the assignment of certain licenses, including 600 MHz and 3.45 GHz licenses, to AT&T and the assignment of certain other licenses, including AWS-4, H-Block and unpaired AWS-3 authorizations, to Space Exploration Technologies Corp. Both transactions were undertaken due to the FCC's unequivocal position that: (i) EchoStar's utilization of its spectrum was not acceptable based on the relatively small number of subscribers using the Boost Mobile MNO network, and (ii) that EchoStar's continued operations failed to best serve the public interest.

**D.T.C. 3-3 Identify any electromagnetic spectrum assets in Massachusetts Boost or its affiliated companies own and intend to use for Lifeline customers.**

DISH 3-3 While BSC and its affiliates may hold FCC licenses in Massachusetts, the hybrid MNO model described herein means our wireless customer traffic will traverse the BSC Core network while routing traffic via another carrier's Radio Access Network.

**D.T.C. 3-4 Elaborate on any changes, with respect to how the company handles wireless traffic, that will result from the assignments of certain DISH assets to Boost.**

DISH 3-4 None. The assignment of retail assets to BSC, including the Gen Mobile brand was undertaken as part of an internal *pro forma* change under both entities' ultimate parent, EchoStar Corporation. Any changes to how the company handles wireless traffic as the result of the transition to a hybrid MNO model is as described herein.

**D.T.C. 3-5 Elaborate on any plans to introduce new offers as mentioned on page two of the Amendment to the Petition.**

DISH 3-5 Gen Mobile has the flexibility to introduce new offers, products, and services without relying on a competitor's facilities and will have the ability to monitor data traffic at the application level, which will allow Gen Mobile to make decisions to optimize plan offerings for a particular group of customers. Regarding Lifeline specifically, the cost savings from the hybrid model (offering wholesale capacity at a lower cost per GB) will likely be reflected in more compelling choices for Lifeline subscribers. Gen Mobile will offer a variety of plans, including plans available at no cost to consumers and "pay as you go" options without long-term commitments. Current offerings include a plan with 1,000 voice minutes, 1,000 texts, and 4.5 GB of data for no cost, and a plan with unlimited voice and text and 11 GB of data for residents of Tribal lands. Lifeline customers will have the choice to apply their Lifeline discount on any retail Gen Mobile-branded prepaid plans provided they pay the difference in the event the plan of their choice is more than the Lifeline discount received.

**D.T.C. 3-6 Identify any other changes that Lifeline customers will experience as a result of the assignment of certain DISH assets to Boost.**

DISH 3-6 Lifeline customers will continue to be served under the Gen Mobile brand, a trusted provider in this market segment. BSC's ownership of the BSS/OSS allows it to provision customers (including phone numbers) and see usage data directly, facilitating better customer support. There are no negative impacts to the service offerings or rates anticipated as a result of this assignment; rather, the model allows for continued investment in growing the customer base.



## COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

### D.T.C. 23-1 Service List

#### Petition for DISH Wireless L.L.C. d/b/a Gen Mobile Designation as an Eligible Telecommunications Carrier

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