



COMMONWEALTH OF MASSACHUSETTS

Department of Telecommunications and Cable

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D.T.C. 24-4

September 16, 2024

In the Matter of GO MD USA LLC d/b/a GO MD USA for Designation as an Eligible
Telecommunications Carrier in the Commonwealth of Massachusetts

FIRST SET OF INFORMATION REQUESTS BY THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE TO GO MD USA, LLC

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

Instructions

The following instructions apply to this set of information requests, and all subsequent requests issued by the Department in this proceeding.

1. All answers should be filed with the Department by the close of business on **November 15, 2024**.
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 "GO MD USA" means GO MD USA, LLC d/b/a GO MD USA and its corporate predecessors, agents, officers, employees, and assigns.
4. 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, GO MD USA. For purposes of this definition, the term "own" means to own an equity interest (or the equivalent thereof) of more than 10 percent.

5. The term “Petition” means GO MD USA’s application for designation as an ETC which the Department received on July 31, 2024.
6. 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 GO MD USA used in developing the projections or estimates.
7. The term “ETC” means eligible telecommunications carrier.
8. The term “FCC” means the Federal Communications Commission.
9. The term “USF” means Universal Service Fund.
10. The term “USAC” means the Universal Service Administrative Co.
11. The term “ACP” means Affordable Connectivity Program.
12. The term “equipment” includes, but is not limited to, a SIM card and/or a device.
13. 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.
14. Requests shall be deemed continuing so as to require further supplemental responses if GO MD USA 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.
15. If any of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.

Requests

- D.T.C. 1-1 State whether GO MD USA presently has physical facilities in Massachusetts that are currently operational or capable of being operational within a short period of time. If yes, please elaborate on the extent of the facilities in Massachusetts.

- D.T.C. 1-2 If GO MD USA does not have physical facilities in Massachusetts, and does not plan to build its own physical facilities in the future, identify whether GO MD USA intends to obtain an FCC approved Compliance Plan.
- D.T.C. 1-3 Provide the number of current GO MD USA non-Lifeline mobile voice and broadband subscribers nationwide and in Massachusetts.
- D.T.C. 1-4 Explain why the DTC contact information is listed on the Terms and Conditions page of GO MD USA's website.
- D.T.C. 1-5 Refer to Exhibit 4. Provide a sample advertisement similar to the ACP advertisement but for Lifeline services that GO MD USA offers.