

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: February 12, 2026

TO: Adam J. Teitzman, Commission Clerk, Office of Commission Clerk

FROM: Samuel Day, Public Utility Analyst III, Office of Industry Development and Market Analysis *SD*

RE: Docket No 20250138-TP – Petition for designation as a facilities based wireless eligible telecommunications carrier (ETC) in the State of Florida, by LTE Wireless Inc.

Attached are documents from the Iowa Utilities Commission (IUC) in Docket No. ETA-2025-0004 regarding LTE Wireless's request for ETC designation in Iowa, including:

- IUC Staff Questions for LTE Wireless, filed November 25, 2025.
- LTE Wireless's Withdrawal Letter to the IUC, filed January 8, 2026.

Please add to docket file.

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COMMISSION
CLERK



Iowa Utilities Commission

Sarah M. Martz, Chair
Joshua J. Byrnes, Commissioner
Erik M. Helland, Commissioner

November 25, 2025

Faizal Hassad
Manager
LTE Wireless INC
244 5 Ave F12 Suite W221
New York, NY 10001

RE: Docket No. ETA-2025-0004
Second Staff Review Letter

Dear Mr. Hassad,

On September 10, 2025, LTE Wireless INC (LTE Wireless) filed an incomplete application for designation as an eligible telecommunications carrier (ETC) pursuant to 47 U.S.C. §§ 214(e) and 254 with the Iowa Utilities Commission (IUC) identified as Docket No. ETA-2025-0004.

On September 18, 2025, Staff filed a staff review letter requesting LTE Wireless to file a revised application in accordance with 199 Iowa Administrative Code (IAC) 39.3(2) within 30 days of the filing of the letter.

On October 23, 2025, LTE Wireless filed a revised application. Staff have reviewed the revised application and requests the following information to complete the application requirements set forth in the IUC's rules at 199 IAC 39.3 and 39.4:

1. 199 IAC 39.3(2)(e) requires a certification that the applicant offers or intends to offer the supported services either using its own facilities or a combination of its own facilities and resale of another carrier's services. Furthermore, the rule states wireless resellers shall provide the name of the facilities-based wireless carrier(s) whose services they are reselling and demonstrate they have an agreement with the carrier(s) in Iowa that will cover the applicant's proposed designated service area. LTE Wireless states that it intends to provide wireless service through a combination of its own network infrastructure and through its underlying service provider of T-Mobile, but does not provide any supporting documentation as required by 39.3(2)(e). Staff request LTE Wireless demonstrate that it has an agreement with its underlying carrier, T-Mobile.

2. 199 IAC 39.3(2)(g) relates to the geographic service area for which the applicant requests an ETC designation, and requires coverage area and signal strength maps for commercial mobile radio service providers. LTE Wireless states that it is a provider of commercial mobile radio service and intends to provide service using a combination of its own facilities and those of its underlying carrier. LTE Wireless provided a map of T-Mobile's coverage area as well as a request for waiver of the rule requiring maps of T-Mobile's signal strength. However, the request for waiver only addresses the signal strength maps of T-Mobile, and does not extend to the requirement that LTE Wireless provide its own signal strength maps as a commercial mobile radio service provider. Staff request that LTE Wireless provide coverage area maps and maps depicting its own signal strength.
3. 199 IAC 39.3(2)(j) relates to an applicant's ability to remain functional in emergency situations. LTE Wireless states that its underlying carriers have the ability to remain functional in emergency situations as Tier 1 carriers. In addition, LTE Wireless states that its own network infrastructure is located in a data center with redundancies, back-up generators, an extensive disaster recovery plan, and that LTE Wireless has the ability to redirect traffic to other carriers. Staff request LTE Wireless provide specific capabilities of LTE Wireless' ability to handle traffic spikes. Additionally, provide clarification regarding the nature of LTE Wireless' data-center-located facilities and how it is capable of redirecting traffic to other carriers.
4. 199 IAC 39.3(2)(m) specifies that an applicant that is seeking designation as an ETC for any part of tribal lands must provide a copy of its application to the affected tribal government and tribal regulatory authority at the time it files the application with the IUC. LTE Wireless did not state that it provided a copy of its application to the affected tribal government or tribal regulatory authority. Please provide a response certifying that a copy of LTE Wireless' application has been provided to all affected tribal governments and tribal regulatory authorities, or amend the application to exclude tribal lands.
5. 199 IAC 39.3(2)(n) requires a commitment to complying with certain consumer protection standards. Subparts (1) and (2) require certifications that an applicant will provide ready access to customer service, and promptly respond to consumer inquiries and complaints from government agencies. The application does not provide the required information on how LTE Wireless will provide ready access to customer service, as required by subpart (1). Staff request that LTE Wireless certify to abiding by the customer service standards set out by 199 IAC 39.3(2)(n)(1).

6. 199 IAC 39.4(1) specifies that the applicant shall submit a copy of its Federal Communications Commission (FCC) compliance plan and FCC notice of approval. In the application, LTE Wireless asserts it will use a combination of its own network infrastructure and that of its underlying carrier, and thus does not require a compliance plan approved by the FCC. However, the application does not include specific information regarding LTE Wireless' owned facilities, and does not explain the role LTE Wireless' own network infrastructure will play in providing Lifeline services. Accordingly, please clarify how LTE Wireless will utilize its own facilities along with the resale of another carrier's facilities for the purposes of being exempt from the requirements of 199 IAC 39.4(1). The response should include details regarding the full extent of LTE Wireless' owned facilities and how such facilities will be used to provide Lifeline services in conjunction with the facilities owned by T-Mobile.
7. 199 IAC 39.4(2) and (3) require an applicant to submit the terms and conditions of voice telephone (39.4(2)) and broadband (39.4(3)) services offered to Lifeline subscribers. If the applicant intends to offer Lifeline subscribers plans that are generally available to the public, the applicant may provide summary information regarding those plans, such as a link to a public website outlining the terms and conditions of the plans.

LTE Wireless addresses this requirement on page 9 of its application, stating that it will allow consumers to apply their Lifeline discount to any of its current prepaid plans found at its website, which is linked in the application. While the website provides information regarding the plans currently offered by LTE Wireless, it also highlights in bold text the availability of such plans without any form of verification, stating that "everyone is automatically approved", and that income verification and credit checks are not required. Given that LTE Wireless purports to offer the same plans to Lifeline customers, please provide an explanation as to how LTE Wireless will differentiate the offering of its Lifeline services, which require extensive verification to qualify for, and the offering of its other services, which are advertised as not requiring any verification.

8. 199 IAC 39.4(4) requires an applicant to demonstrate its financial and technical capabilities to provide supported services. Although LTE Wireless states in the application that it is financially and technically capable of providing service, the application contains no substantiation to support its claim. Staff request LTE Wireless provide a demonstration of its financial and technical capabilities. A non-exhaustive list of relevant considerations is listed within rule 39.4(4).
9. On page 11 of LTE Wireless' Revised Application, LTE Wireless asserts that it will follow all IUC imposed requirements. However, since first registering with

the IUC to provide telecommunications services in Iowa in 2019, LTE Wireless has repeatedly required intervention from the IUC to ensure compliance with the IUC's reporting requirements. Specifically, the IUC has put LTE Wireless on notice of potential cancellation of its telecommunications registration three times since 2021 for failure to timely file its annual report, including each of the past two years.

Providing a timely annual report is far less burdensome than the reporting requirements expected of Iowa-designated ETCs, both with the state as well as the FCC. Please provide an explanation as to why LTE Wireless' past noncompliance should not weigh against the IUC's consideration in this matter.

In order for staff to evaluate the merits of LTE Wireless' request for ETC designation, LTE Wireless must first satisfy each requirement for a complete application pursuant to 199 IAC 39.3(2) and 39.4. Staff request that LTE Wireless provide a response to the items identified in Docket No. ETA-2025-0004 within 30 days of issuance of this letter.

Sincerely,

Lizzie Mora
Huber

Digitally signed by Lizzie Mora
Huber
Date: 2025.11.25 12:18:58 -06'00'

Lizzie Mora Huber, Utility Analyst
Regulatory Analysis

**BEFORE THE
IOWA UTILITIES COMMISSION**

In the Matter of the Application of LTE
Wireless INC for Designation as an
Eligible Telecommunications Carrier Pursuant
to 47 U.S.C. 214(e)

**APPLICATION FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER**

LTE Wireless Inc is formally requesting to withdraw its petition for Designation as an Eligible Telecommunications Provider docket ETA-2025-004 in the State of Iowa without prejudice. LTE Wireless Inc will file for designation at a later time.

Thanks,

Faizel Hassad