

**BEFORE THE
STATE OF UTAH
PUBLIC SERVICE COMMISSION**

DISH Wireless L.L.C.)
Petition for Designation as an Eligible)
Telecommunications Carrier in the State of)
Utah for the Limited Purpose of Providing) Docket No. 23-2641-01
Lifeline Service to Qualifying Customers)
)
)

**PRE-FILLED SUPPLEMENTAL DIRECT TESTIMONY OF ROBERT YAP ON
BEHALF OF DISH WIRELESS L.L.C. DBA GEN MOBILE**

DISH Wireless L.L.C. dba Gen Mobile respectfully submits the attached pre-filled direct supplemental testimony of Robert Yap as a supplement to the direct testimony filed with the State of Utah Public Service Commission on March 29, 2023.

Respectfully submitted,



Alison Minea
Vice President and Associate General Counsel
DISH Wireless L.L.C.
1110 Vermont Ave NW Ste. 450
Washington, DC 20005
(202) 463-3709
Alison.Minea@dish.com

August 1, 2023

1 **1. Please state your name, your position with DISH Wireless L.L.C., and your Business**
2 **address.**

3 My name is Robert Yap. I am the Vice President of the Gen Mobile brand under DISH
4 Wireless L.L.C. (“DISH Wireless” or the “Company”) and my business location is P.O.
5 Box 1187, Gardena, CA 90249.

6 **2. What is the purpose of your testimony?**

7 The purpose of my testimony, combined with the petition that DISH Wireless filed on
8 March 6, 2023 (the “Petition”) and the direct testimony filed on March 29, 2023, is to
9 provide additional testimony to support the Petition for the Company to be designated as
10 a Lifeline-only ETC for the entire geographic area of the State of Utah under the “Gen
11 Mobile” trade name subject to our service area. During the discovery phase of the
12 proceedings in the above-mentioned docket, there were two particular questions about
13 which the Office of Consumer Services (“OCS”) and Division of Public Utilities
14 (“DPU”), as Parties to this proceeding, requested clarification. The Parties believe, and
15 DISH Wireless agrees, that the Utah Public Service Commission (the “Commission”)
16 would appreciate such clarification. By way of this testimony, the Company seeks to
17 answer those questions. The facts stated in this testimony are true of my own personal
18 knowledge, except as to any matters stated on information and belief, and as to those
19 matters, I am informed and believe them to be true.

20 **3. Do you verify that the statements and facts made in DISH Wireless application?**

21 I further verify and confirm the statements and assertions made in DISH Wireless’
22 Petition and exhibits attached thereto.

23 //

1 **4. What is the relationship between DISH Wireless and Gen Mobile?**

2 As mentioned in its Petition and entered into the record of this proceeding, DISH
3 Wireless is a limited liability company organized and headquartered in Colorado. DISH
4 Wireless is the business entity that is petitioning for the designation as an Eligible
5 Telecommunications Carrier (“ETC”) in the State of Utah for the limited purpose of
6 providing Lifeline service to qualifying customers. This is the same entity that is
7 building out the nation’s first virtualized, cloud-native, Open RAN-based 5G broadband
8 network. As of June 14, 2023, the Company offers 5G broadband service using its own
9 wireless facilities to more than 70% of the U.S. population.¹ DISH Wireless offers
10 service on its own network and on partner networks using multiple brand names. In
11 October 2021, DISH Wireless acquired the Gen Mobile brand, operations, and customer
12 assets from Gen Mobile Inc. As such, Gen Mobile is now a brand name and is owned
13 and operated by DISH Wireless. No other entity, whether an affiliate or subsidiary, owns
14 or operates the Gen Mobile brand.

15 **5. Does DISH Wireless offer any facilities-based services, which have been deployed in**
16 **Utah?**

17 Yes.

18 **6. Will DISH Wireless be able to provide Lifeline services consistent with 47 C.F.R. §**
19 **54.201(d)(1) of the rules of the Federal Communications Commission?**

20 Yes, using its own facilities or a combination of its own facilities and resale of another
21 carrier’s services.

¹ See Press Release, DISH Wireless L.L.C., The DISH 5G Network is Now Available to Over 70 Percent of the U.S. Population (June 15, 2023) (<https://about.dish.com/2023-06-15-The-DISH-5G-Network-is-Now-Available-to-Over-70-Percent-of-the-U-S-Population>).

1 **7. Is there anything else you would like to add to your testimony?**

2 Yes, I would like to reiterate that DISH Wireless meets the requirements for designation
3 as an ETC in the State of Utah. Accordingly, DISH Wireless respectfully requests that
4 the Commission designate DISH Wireless as an ETC in the State of Utah for the purpose
5 of participating in the Lifeline program at the earliest possible time.

6 **8. Does this conclude your testimony?**

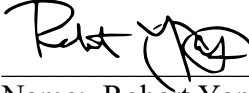
7 Yes.

State of California)
)
County of Los Angeles)

CERTIFICATION

I, Robert Yap, Vice President of Gen Mobile for DISH Wireless L.L.C., have reviewed and am familiar with the foregoing Testimony. The statements in the foregoing document are true of my own knowledge, except as to matters which are herein stated on information and belief, and as to those matters, I believe them to be true.

July 31, 2023
Date


Name: Robert Yap
Title: Vice President of Gen Mobile
DISH Wireless L.L.C.

CERTIFICATE OF SERVICE

I, Debra McGuire Mercer, counsel for DISH Wireless, L.L.C., certify that on August 1, 2023, a true and correct copy of the foregoing was delivered upon the following as indicated below:

By Email:

Patricia Schmid (pschmid@agutah.gov)
Patrick Grecu (pgrecu@agutah.gov)
Robert Moore (rmoore@agutah.gov)
Assistant Utah Attorneys General

Madison Galt (mgalt@utah.gov)
Division of Public Utilities

Alyson Anderson (akanderson@utah.gov)
Bela Vastag (bvastag@utah.gov)
Alex Ware (aware@utah.gov)
Jacob Zachary (jzachary@utah.gov)
(ocs@utah.gov)
Office of Consumer Services

/s/ Debra McGuire Mercer
Debra McGuire Mercer