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April 16, 2024

**VIA ELECTRONIC DELIVERY**

Florida Public Service Commission  
Office of Commission Clerk  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

Re: Q LINK WIRELESS LLC Petition for ETC Designation

To Whom It May Concern,

Q LINK WIRELESS LLC (“Q LINK” or the “Company”) hereby submits the attached Petition for Designation as an Eligible Telecommunications Carrier (“ETC”).

If you have any questions or if I may provide you with additional information, please do not hesitate to contact me. Thank you for your assistance.

Respectfully submitted,

*/s/ Lance J.M. Steinhart*

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*Attorneys for Q LINK WIRELESS LLC*

Attachments

cc: Maybell Kelly

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

Q LINK WIRELESS LLC )  
 )  
Petition for Designation as an Eligible ) Docket No. \_\_\_\_\_  
Telecommunications Carrier )  
\_\_\_\_\_ )

**PETITION**

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April 16, 2024

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**PETITION**

**I. INTRODUCTION**

Q LINK WIRELESS LLC (“Q LINK” or the “Company”), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”)<sup>1</sup>, Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”),<sup>2</sup> and the rules and regulations of the Florida Public Service Commission (“Commission”), including section 364.10 Florida Statutes (F.S.), as recently amended, hereby submits this Petition for Designation as an Eligible Telecommunications Carrier (“ETC”) in the state of Florida (“Petition”). Q LINK seeks ETC designation solely to provide Lifeline service to qualifying Florida consumers; it will not seek access to funds from the federal Universal Service Fund (“USF”) for the purpose of participating in the Link-Up program or high-cost program.<sup>3</sup>

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<sup>1</sup> 47 U.S.C. § 214(e)(2)

<sup>2</sup> 47 C.F.R. §§ 54.101-54.207.

<sup>3</sup> The Company does not seek access to state USF in the instant Petition. Given that Q LINK only seeks support from the low-income program and does not seek any high-cost support, ETC certification requirements for the high-cost program are not applicable to the Company.

As demonstrated herein, and as certified in Exhibit 1 to this Petition, Q LINK meets all the statutory and regulatory requirements for designation as an ETC in Florida, including the requirements outlined in the FCC’s *Lifeline and Link Up Reform Order*<sup>4</sup> and *Lifeline Modernization Order*,<sup>5</sup> and *Fifth Report and Order*.<sup>6</sup> Q LINK is uniquely positioned to reach unserved and underserved Lifeline-eligible consumers, especially those in rural areas. Rapid grant of Q LINK’s request, moreover, would advance the public interest because it would enable the Company to immediately commence providing much needed Lifeline services to a broad range of low-income customers in Florida as soon as possible. Accordingly, the Company respectfully requests that the Commission expeditiously approve this Petition.

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

Lance J.M. Steinhart  
Managing Attorney  
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<sup>4</sup> *In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) (“*Lifeline and Link Up Reform Order*”).

<sup>5</sup> *In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket No. 11-42, WC Docket No. 00-197, WC Docket No. 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) (hereinafter, “*Third Report and Order*” or “*Lifeline Modernization Order*”).

<sup>6</sup> *In the Matter of Bridging the Digital Divide for Low-Income Consumers, Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support*, WC Docket No. 17-287, WC Docket No. 11-42, WC Docket No. 09-197, Fifth Report and Order, Memorandum Opinion and Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking, FCC 19-111 (rel. Nov. 14, 2019) (hereinafter, “*Fifth Report and Order*”).

## **II. COMPANY OVERVIEW**

Q LINK is a Delaware limited liability company, organized on August 25, 2011, with principal offices located at 499 East Sheridan Street, Suite 400, Dania Beach, Florida 33004. Q LINK is authorized to provide business as a foreign corporation in the State of Florida. See Exhibit 2 which is attached hereto. Q LINK is wholly-owned by its parent, QUADRANT HOLDINGS GROUP LLC (“Quadrant Holdings”). Q LINK also owns 100% of Q Lixar Corporation, an entity that provides mobile advertising and is not a regulated entity. Quadrant Holdings is a non-regulated Delaware limited liability company with principal offices located at 499 East Sheridan Street, Suite 400, Dania Beach, Florida 33004. Quadrant also owns 100% of: (1) Centurion Logics, LLC, a Florida limited liability company, an entity that provides proprietary back-end software and is not a regulated entity; and (2) Hello Mobile Telecom, LLC (“Hello Mobile”), a Delaware limited liability company, an entity that provides non-Lifeline wireless services in all of the United States (except California and Wyoming), the District of Columbia, and Puerto Rico.

Q LINK is a provider of commercial mobile radio service (“CMRS”) and provides prepaid wireless telecommunications services to consumers by using the underlying wireless network of Tier I facilities-based carriers, currently T-Mobile USA, Inc. (“T-Mobile” or “Underlying Carrier”), on a wholesale basis. Q LINK is currently designated as an ETC in the following jurisdictions: Alabama, Arizona, Arkansas, Colorado, Georgia, Hawaii, Idaho, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Michigan, Minnesota, Mississippi, Missouri, Nevada, New Jersey, New York, North Dakota, Ohio, Oklahoma, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, Tennessee, Texas, US Virgin Islands, Utah, Vermont, Virginia, Washington, West Virginia, Wisconsin and Wyoming.

Q LINK will provide affordable prepaid mobile phone service, including calling, text messaging, and broadband access. Q LINK’s products and plans will be specially geared toward

serving lower income communities, especially in rural areas that are predominantly unserved by other ETCs designated in Florida, and its service models and pricing plans will reflect this mission. The Company will not require service contracts from its customers, and it will always ensure competitively low pricing for its services and products. Q LINK will manage all aspects of the customer experience, including setting service pricing, handset selection, marketing materials, and customer service. The Company's prepaid, budget-friendly pricing will give many low-income consumers the option of having mobile phone service and broadband access without the burden of hidden costs, varying monthly charges, or contractual commitments. Customers will be able to customize their Q LINK service to suit their needs with Q LINK's available bundles of minutes, broadband data, and text packages to supplement their monthly plan.

Q LINK's Lifeline customers will be low-income consumer households, and many are unlikely to have had phone service or broadband access of any kind prior to enrollment. Q LINK's customers will depend on, and benefit greatly from, Q LINK's inexpensive and flexible pricing plans. Q LINK will not impose credit checks nor will it require any deposits or contractual commitments. Most of Q LINK's customers likely will turn to Q LINK because they cannot afford the postpaid services provided by traditional wireless carriers. Q LINK will affirmatively reach out to the low-income sector of the consumer base to offer attractive and affordable communications options. As such, Q LINK will contribute to the expansion of mobile wireless and broadband services for low-income consumers in Florida.

By providing affordable wireless plans and quality customer service to consumers who are otherwise unable to afford them, or who were previously ignored by traditional carriers, Q LINK will expand the availability of wireless services to many more consumers, which is the principal reason that Congress created the universal service program.



### III. THE COMMISSION HAS JURISDICTION TO DESIGNATE WIRELESS ETCs

Section 214(e)(2) of the Act provides state public utility commissions with the “primary responsibility” for the designation of ETCs.<sup>7</sup> Although Section 332(c)(3)(A) of the Act prohibits states from regulating the entry of or the rates charged by any provider of commercial mobile service or any private mobile service, this prohibition does not allow states to deny wireless carriers ETC status.<sup>8</sup> Under the Act, a state public utility commission with jurisdictional authority over ETC designations must designate a common carrier as an ETC if the carrier satisfies the requirements of section 214(e)(1). The Commission now has jurisdiction over designation of wireless ETCs pursuant to Enactment of the Florida Legislature which passed Senate Bill 478, both the Florida Senate and the House of Representatives, and was signed into law effective April 15, 2024, which amended 364.10, F.S. as follows:

364.10(1)(a) For the purposes of this section, the term “eligible telecommunications carrier” means an entity a telecommunications company, as defined by s. 364.02, which is designated as an eligible telecommunications carrier by the commission pursuant to 47 C.F.R. s. 54.201 and this section.

364.10(3)

(a) The commission has the power and authority to designate an entity, upon petition and in accordance with 47 C.F.R. s. 54.201, as an eligible telecommunications carrier, provided that such entity is: 1. A telecommunications company; or 2. A commercial mobile radio service provider.

(b) This legislative authority is intended to be sufficient to enable the commission, for the limited purpose of providing Lifeline service under this section, to approve any of the types of entities specified in paragraph (a) as an eligible telecommunications carrier.

Q LINK recognizes that Section 214(e)(1)(A) of the Act states that ETCs shall offer services, at least in part, over their own facilities and that Section 54.201(i) of the FCC’s Rules (47

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<sup>7</sup> 47 U.S.C. § 214(e)(2).

<sup>8</sup> *USF Order*, at 8858-59, ¶ 145.

C.F.R. § 54.201(i)) prohibits state commissions from designating as an ETC a telecommunications carrier that offers services exclusively through the resale of another carrier's services. However, the FCC has granted forbearance from enforcement of this facilities requirement to carriers seeking Lifeline-only ETC designation.<sup>9</sup> Section 10(e) of the Act (47 U.S.C. § 160(e)) provides: “[a] State commission may not continue to apply or enforce any provision of this chapter that the [Federal Communications] Commission has determined to forbear from applying under subsection (a) of this section.” As such, the Commission is required by Section 10(e) to act in accordance with the FCC's grant of forbearance, and therefore, may not apply the facilities-based requirement to Q LINK. Therefore, the Commission has the authority under Section 214(e)(2) of the Act to grant Q LINK's request for designation as an ETC throughout Florida.

#### **IV. Q LINK SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC UNDER 47 C.F.R. § 54.201**

Section 254(e) of the Act provides that “only an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive specific federal universal service support.” Section 214(e)(2) of the Act authorizes state commissions, such as the Commission, to designate ETC status for federal universal service purposes and authorizes the Commission to designate wireless ETCs.<sup>10</sup> Section 214(e)(1) of the Act and Section 54.201(d) of the FCC's rules provide that applicants for ETC designation must be common carriers that will offer all of the services supported by universal service, either using their own facilities or a combination of their own facilities and the resale of another carrier's services, except where the FCC has forbore from the “own facilities” requirement. Applicants also must commit to advertise the availability and

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<sup>9</sup> See *Lifeline and Link Up Reform Order* at ¶ 368.

<sup>10</sup> See *Federal-State Joint Board on Universal Service, First Report and Order*, 12 FCC Rcd 8776, 8858-59, ¶ 145 (1997) (“*USF Order*”).

rates of such services,<sup>11</sup> and provide additional information set forth in 47 C.F.R. § 54.202(a). As detailed below, Q LINK satisfies each of the above-listed requirements.

**A. Q LINK Will Provide Service Consistent with the FCC’s Grant of Forbearance from Section 214’s Facilities Requirements**

Although Section 214 requires ETCs to provide services using their facilities, at least in part, the FCC has forbore from that requirement with respect to carriers such as Q LINK. In the *Lifeline and Link Up Reform Order*, the FCC granted forbearance from the “own-facilities” requirement contained in Section 214(e)(1)(A) for carriers that are, or seek to become, Lifeline-only ETCs, subject to the following conditions:<sup>12</sup>

(1) the carrier must comply with certain 911 requirements [(a) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; (b) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services; and (c) complying with conditions (a) and (b) starting on the effective date of this Order]; and

(2) the carrier must file, and the Bureau must approve, a compliance plan providing specific information regarding the carrier’s service offerings and outlining the measures the carrier will take to implement the obligations contained in this Order as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary.”

In accordance with the *Lifeline and Link Up Reform Order*, Q LINK filed its Compliance Plan which the FCC approved on August 8, 2012.<sup>13</sup> A copy of the approved Compliance Plan is attached hereto as Exhibit 3. Q LINK commits to providing Lifeline service in Florida in accordance with the Compliance Plan and in compliance with applicable state and federal regulations, to the extent amendments thereto may supersede commitments made in the Compliance Plan.

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<sup>11</sup> See 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d)(2).

<sup>12</sup> See *Lifeline and Link Up Reform Order* at ¶¶ 368, 373 and 379.

<sup>13</sup> See FCC Public Notice DA 12-1286, <https://www.fcc.gov/document/wcb-approves-compliance-plans-birch-communications>.

**B. Q LINK Is a Common Carrier**

CMRS providers like Q LINK are common carriers.<sup>14</sup>

**C. Q LINK Will Provide All Supported Services**

Through its wholesale arrangement with Underlying Carrier, Q LINK is able to provide all supported services required by FCC's Rules (47 C.F.R. § 54.101(a)), as follows:

**1. Voice Telephony Service**

The FCC has determined that “eligible voice telephony services must provide voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and toll limitation services to qualifying low-income consumers as provided in [47 C.F.R. § 54] subpart E.”<sup>15</sup>

Voice Grade Access. Q LINK provides voice grade access to the public switched network (“PSTN”) through the purchase of wholesale CMRS services from its facilities-based Underlying Carrier.

Local Usage. Q LINK offers a variety of rate plans that provide its customers with minutes of use for local and long distance service alike at no additional charge beyond the monthly plan

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<sup>14</sup> *Implementation of Sections 3(n) and 332 of the Communications Act, Regulatory Treatment of Mobile Services*, GN Docket No. 93-252, Second Report and Order, 9 FCC Rcd 1411, 1425 ¶ 37, 1454-55 ¶ 102 (1994) (wireless resellers are included in the statutory “mobile services” category, and providers of cellular service are common carriers and CMRS providers); 47 U.S.C. § 332(c)(1)(A) (“mobile services” providers are common carriers); *see also PCIA Petition for Forbearance for Broadband PCS*, WT Docket No. 98-100, Memorandum Opinion and Order and Notice of Proposed Rulemaking, 13 FCC Rcd 16857, 16911 ¶ 111 (1998) (“We concluded [in the *Second Report and Order*] that CMRS also includes the following common carrier services: cellular service, ... all mobile telephone services and resellers of such services.”)

<sup>15</sup> *See* 47 C.F.R. § 54.101(a).

rate (which is \$0 after Lifeline support).

Access to Emergency Services. Q LINK provides 911 and E911 access for all of its customers to the extent the local government in its service area has implemented 911 or E911 systems. As noted, calls to 911 emergency services will always be free and will be available regardless of service activation status or availability of minutes. Q LINK also complies with the FCC's regulations governing the deployment and availability of E911 compatible handsets.

Toll Limitation. In its *Lifeline and Link Up Reform Order*, the FCC stated that toll limitation would no longer be deemed a supported service.<sup>16</sup> "ETCs are not required to offer toll limitation service to low-income consumers if the Lifeline offering provides a set amount of minutes that do not distinguish between toll and non-toll calls."<sup>17</sup> Nonetheless, Q LINK's offerings inherently allow Lifeline subscribers to control their usage, as its wireless service is offered on a prepaid, or pay-as-you-go, basis. Q LINK's service, moreover, is not offered on a distance-sensitive basis and local and domestic long distance minutes are treated the same.

## **2. Broadband Internet Access Service**

The FCC has stated that broadband internet access service ("BIAS") consists of the ability for a user to receive "the capability to transmit data to and receive data from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up Internet access service."<sup>18</sup> Q LINK will provide BIAS to low-income consumers via resale of its Underlying Carrier's mobile services so that customers have access to full Lifeline support.

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<sup>16</sup> See *Lifeline and Link Up Reform Order* at ¶ 367.

<sup>17</sup> See *Lifeline and Link Up Reform Order* at ¶ 49.

<sup>18</sup> See 47 C.F.R. § 8.2(a).

#### **D. Q LINK Requests Designation Throughout Its Service Area**

Q LINK is not a rural telephone company as defined in Section 153(37) of the Act (47 U.S.C. § 153(37)). Accordingly, Q LINK is required to describe the geographic area(s) within which it requests designation as an ETC. Q LINK requests designation as an ETC statewide, including federally recognized tribal lands, subject to the existence of its Underlying Carrier's facilities and corresponding coverage, including as it may change going forward. A current coverage map is attached hereto as Exhibit 4. Q LINK understands that its service area overlaps with rural carriers in Florida, but maintains that the public interest factors described below justify its designation in these carriers' service areas, especially because it seeks ETC designation solely to utilize USF funding to provide Lifeline service to qualified low-income consumers.

Therefore, designation of Q LINK as an ETC will cause no growth in the high-cost portions of the USF and will not erode high-cost support from any rural telephone company. In fact, the FCC has determined that “[d]esignation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies.”<sup>19</sup> While the federal rules (47 U.S.C. §§ 160, 214(e)(5) and 47 C.F.R. § 54.207(b)) require that the service area of an ETC conform to the service area of any rural telephone company serving the same area (the “service area conformance” requirement), the FCC’s *Lifeline and Link Up Reform Memorandum Opinion and Order* (FCC 13-44 released April 15, 2013) authorized forbearance from the service area conformance requirements with respect to carriers seeking to provide Lifeline-only service.<sup>20</sup> In light of this forbearance, the Commission

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<sup>19</sup> See *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming, Memorandum Opinion and Order*, 16 FCC Rcd 48, 55 (2000).

<sup>20</sup> See *In the Matter of Telecommunications Carriers Eligible for Support, Lifeline and Link Up Reform*, WC Docket No. 09-197, WC Docket No. 11-42, Memorandum Opinion and Order, FCC 13-44 (rel. April 15, 2013).

has the authority to designate ETCs such as Q LINK in rural areas without concern for the service area conformance requirement.<sup>21</sup>

**E. Q LINK Will Advertise the Availability of Supported Services**

Q LINK will advertise the availability and rates for Lifeline service using media of general distribution as required by 47 C.F.R § 54.201(d)(2). Q LINK's advertising will comply with the FCC's rules regarding information to be included in marketing materials, including FCC rule section 54.405(c). Specifically, Q LINK's marketing materials will explain in clear, easily understood language the following disclosures: (i) the service is a Lifeline service; (ii) Lifeline is a government assistance program; (iii) the service may not be transferred to someone else; (iv) consumers must meet certain eligibility requirements before enrolling in the Lifeline program; (v) the Lifeline program permits only one Lifeline discount per household; (vi) documentation is necessary for enrollment; and (vii) Q LINK is the provider of the services. Moreover, the Lifeline application form will state that Lifeline is a federal benefit and that consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program. See Exhibit 5 for a sample advertisement.

Q LINK will advertise its services in a manner reasonably designed to reach those likely to qualify for Lifeline service. Q LINK has been very successful at targeting online advertising to low income consumers through business or public internet addresses, including through search engines and social media. Q LINK will continue to advertise its services in this manner, which has allowed it to grow organically to become one of the principal Lifeline providers in the nation. Moreover, Q LINK will expand its advertising efforts as necessary to ensure that Lifeline-eligible customers are aware of the Company's service offerings.

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<sup>21</sup> See 47 C.F.R. § 54.207(c).

**V. Q LINK SATISFIES THE ADDITIONAL REQUIREMENTS FOR ETC DESIGNATION UNDER 47 C.F.R. § 54.202(a)**

Q LINK hereby provides the additional information and certifications required for carriers seeking ETC designation as set forth in 47 C.F.R. § 54.202(a).

**A. Service Commitment Throughout the Proposed Designated Service Area**

In accordance with 47 C.F.R. § 54.202(a)(1)(i), and by the attached certification, Q LINK commits to comply with the service requirements applicable to the low-income support that it receives, including the rules set forth in the FCC's *Fifth Report and Order*. Because Q LINK seeks ETC designation in order to provide supported services only under subpart E of Part 54 of the Commission's Rules, submission of a five-year plan under 47 C.F.R. § 54.202(a)(1)(ii) is not required.

Q LINK will provide service in Florida by reselling service which it obtains from its Underlying Carrier, whose network is operational and largely built out. Thus, Q LINK will be able to commence offering its Lifeline service to all locations served by its Underlying Carrier very soon after receiving approval from the Commission. Upon receiving ETC designation from the Commission, Q LINK will immediately apply for a study area code (SAC) from the Universal Service Administrative Company (USAC), and will begin offering services upon issuance of the SAC.

**B. Ability to Remain Functional in Emergency Situations**

In accordance with 47 C.F.R. §54.202(a)(2), Q LINK has the ability to remain functional in emergency situations. Through its Underlying Carrier, Q LINK provides to its customers the ability to remain functional in emergency situations as provided by the Underlying Carrier, which includes access to a reasonable amount of back-up power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability



of managing traffic spikes resulting from emergency situations. Q LINK's Underlying Carrier has provisions to meet emergencies resulting from failure of commercial or power service, sudden and prolonged increase in traffic, illness of personnel, fire, storm, or other natural disasters.

**C. Commitment to Consumer Protection and Service Quality**

Under FCC guidelines, an ETC applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards, and wireless applicants may satisfy this requirement with a commitment to comply with the Cellular Telecommunications and Internet Association's ("CTIA") Consumer Code for Wireless Service.<sup>22</sup> The Company hereby commits to comply with the CTIA Consumer Code for Wireless Service. See Exhibit 8.

Customers are able to contact Q LINK's Customer Service department by (1) dialing 611 or Q LINK's toll-free number 1-855-QLINK43 (1-855-754-6543), with representatives available from 8am-9pm EST Monday-Friday and 9am-6pm EST Saturday-Sunday, (2) live chat or "Contact Us" through Q LINK's website available 24/7, (3) fax at 1-855-83QLINK (1-855-837-5465), (4) email at support@qlinkwireless.com, and (5) mail to Support Department, 499 East Sheridan Street, Suite 400, Dania, FL 33004. Customers may also access assistance online 24/7 through the "HELP CENTER" in the "My Account" section of Q LINK's website. Q LINK will cooperate fully with the Commission to resolve all consumer complaints.

The Company contacts for customer complaints and for the Florida PSC annual lifeline data request for Legislative report are as follows:

Maybell Kelly, Compliance Director  
reg@qlinkwireless.com  
Corporate: 800-610-1540  
Consumer Complaints: 855-754-6543

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<sup>22</sup> See 47 C.F.R. § 54.202(a)(3).

#### **D. Q LINK is Financially and Technically Capable**

In accordance with 47 CFR §54.202(a)(4), Q LINK is financially and technically capable of providing Lifeline-supported services. Since it began operations in 2012, Q LINK has grown to be one of the principal Lifeline providers in the nation, currently providing Lifeline service in thirty-eight (38) jurisdictions. Q LINK receives revenue from a number of sources which are completely independent from the revenue it will receive in the form of Lifeline support. Q LINK does not and will not rely exclusively on USF disbursements to operate. In addition, Q LINK's financial and technical capabilities to provide service are demonstrated by its performance over eleven (11) years, with consistently strong service, organic growth, and robust protections to ensure its Lifeline customers meet eligibility requirements. The Company has not been subject to ETC revocation proceedings in any state. Furthermore, the senior management of Q LINK has great depth in the telecommunications industry and offers extensive telecommunications business technical and managerial expertise to the Company.<sup>23</sup> Q LINK performs all the following functions in-house: billing, technology and software development; kiosk development and technology; marketing/sales, accounting, customer service, representative training, review of the enrollment and verification process in cooperation with National Verifier, and fulfillment of all orders direct to consumers. Q LINK's infrastructure was designed, built, and operates completely in-house at its state-of-the-art approximately 36,000 sq. foot facility in Dania, Florida. Q LINK will be providing resold wireless service, and therefore will also rely upon the managerial and technical expertise of its Underlying Carrier.

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<sup>23</sup> See Exhibit 6 for key management bios.

### **E. Terms and Conditions of Proposed Lifeline Offering**

Q LINK has the ability to provide all services supported by the universal service program, as detailed in Section 54.101(a) of the FCC's Rules (47 C.F.R. § 54.101(a)) throughout Florida. Q LINK is a leader in the prepaid marketplace by offering consumers exceptional value and competitive amounts of voice and/or broadband usage. Q LINK commits that its Lifeline-supported services will meet or exceed the minimum service standards set forth in 47 C.F.R. § 54.408, including as they change going forward.<sup>24</sup> To the extent Q LINK provides devices for use with Lifeline-supported broadband service, such devices will meet the equipment requirements set forth in 47 C.F.R. § 54.408(f), and Q LINK will not impose an additional or separate tethering charge for mobile data usage below the minimum standard.

Attached hereto as Exhibit 7 is a summary table of the Company's proposed Lifeline service offerings, showing that Lifeline customers will receive 1,000 voice minutes, unlimited text messages, and 4.5 gigabytes (GB) of data per month (i.e. the minimum service standards for both voice *and* broadband) at a net cost of \$0.00 after application of Lifeline support.<sup>25</sup> Tribal Lifeline customers will receive unlimited talk, text and data at a net cost of \$0.00 after application of enhanced tribal Lifeline support. Customers will also be able to purchase additional minutes or data as needed, including international calling credits.

In addition to wholly-supported or discounted wireless services, qualified Lifeline customers will receive a free SIM card as well as access to voice mail, caller I.D., call forwarding, 3-way calling, and call waiting features at no additional charge. Customers may use their minutes to place domestic long-distance calls at no additional charge, and calls to the Company's customer

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<sup>24</sup> Q LINK will bundle voice service with a plan that meets the broadband minimum service standards to ensure customers receive the full \$9.25 Lifeline support.

<sup>25</sup> The Company's terms and conditions of service are maintained on its website, at <https://www.qlinkwireless.com>.

service are free with no deduction of available minutes. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes. Q LINK's prepaid offering will be an attractive alternative for consumers who need the mobility, security, and convenience of a wireless phone, but who are concerned about usage charges or long-term contracts.

**F. Q LINK Will Comply with Lifeline Certification and Verification Requirements**

Customers interested in obtaining information on the Lifeline program will be directed to a toll-free telephone number and to the Company's website, which will contain information regarding the Company's Lifeline service plans, including a detailed description of the program and eligibility criteria. Customers must then apply directly through the National Lifeline Eligibility Verifier ("National Verifier"), which they may do online or by submitting all required documentation to the National Verifier by mail. Customers may download a copy of the application form from the Internet (either from the National Verifier's or Company's website) or request that a copy be mailed to them. Q LINK utilizes the standard Lifeline application forms as required by FCC rules, and thus complies with the disclosure and information collection requirements in 47 C.F.R. § 54.410(d).<sup>26</sup>

Q LINK will certify initial consumer eligibility, and annually verify continued eligibility, in accordance with 47 C.F.R. § 54.410, and will notify the applicant that the prepaid service must be personally activated by the subscriber and the subscriber must use their service every thirty (30) days. Q LINK further confirms that it will not provide a consumer with an activated device and will not activate a Lifeline service unless or until it has confirmed that the consumer is a qualifying

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<sup>26</sup> *FCC Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline Program*, WC Docket No. 11-42, Public Notice, "Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline Program," DA 18-161 (rel. Feb. 20, 2018). The standard application/certification forms are available on USAC's website (See USAC, Lifeline Forms, <http://www.usac.org/li/tools/forms/default.aspx>).

low-income household pursuant to 47 C.F.R. § 54.409, and completed the required eligibility determination and certification requirements of 47 C.F.R. §§ 54.410, 54.404-54.405. Processing of consumers' applications and determination of eligibility will be performed by the National Verifier.

**G. Prevention of Waste, Fraud and Abuse**

The FCC has taken steps to further curb abuse in the Lifeline program by establishing the National Verifier, which transfers the responsibility of eligibility determination away from Lifeline providers. Q LINK will rely on the National Verifier to determine initial and ongoing eligibility of Florida Lifeline subscribers. The National Verifier queries the National Lifeline Accountability Database ("NLAD") for every enrollment to determine whether a prospective subscriber is currently receiving a Lifeline service from Q LINK or any other ETC, and whether anyone else living at the prospective subscriber's residential address is currently receiving Lifeline service. Q LINK thus complies with the requirements of section 54.404 of the FCC's rules. In addition, Company personnel emphasize the "one Lifeline service per household" restriction in their direct sales contacts with potential customers.

Moreover, Q LINK employs a state-of-the-art proprietary fraud prevention system and does not utilize agents or third party representatives for Lifeline enrollment, and does not pay any commissions or sales incentives on Lifeline sign-ups. This model, which Q LINK has employed for almost the entirety of its Lifeline operations, was endorsed by the FCC's *Fifth Report and Order* which set forth reforms to strengthen the Lifeline program's enrollment, recertification, and reimbursement processes, including the prevention of Lifeline ETCs from paying commissions to agents. This direct-to-customer model utilizes technology to protect against waste, fraud and abuse. Q LINK recognized the value of this approach early and has a detailed, proven methodology that has and will continue to give it a competitive advantage over its competitors, demonstrating

Q LINK's commitment to being a trusted steward with public resources.

Furthermore, consistent with federal regulations, the Company will not seek USF reimbursement for inactive subscribers and will de-enroll any subscriber that has not used the Company's Lifeline service as set forth in 47 C.F.R. § 54.407(c)(2). An account will be considered active if the authorized subscriber establishes usage, as "usage" is defined by 47 C.F.R. § 54.407(c)(2), during the specified timeframe, currently a period of thirty (30) days, or during the notice period set forth in 47 C.F.R. § 54.405(e)(3), currently a period of fifteen (15) days. In accordance with 47 C.F.R. § 54.405(e)(3), Q LINK will provide the subscriber advanced notice, using clear, easily understood language, that the subscriber's failure to use the Lifeline service within the notice period will result in service termination for non-usage. Customers that have been deactivated may participate in the Company's Lifeline service in the future by reapplying and re-establishing eligibility.

#### **H. Q LINK Will Comply with Reporting Requirements**

Q LINK will provide the Commission a copy of its annual certifications and Lifeline recertification results pursuant to 47 C.F.R. § 54.416 (i.e. FCC Form 555), as well as a copy of its annual report filed pursuant to 47 C.F.R. § 54.422 (i.e. FCC Form 481), and will comply with any applicable Commission reporting requirements for Lifeline ETCs.

#### **I. Q LINK Will Comply with Regulations Imposed By The Commission**

By this Petition, Q LINK hereby asserts its willingness and ability to comply with the rules and regulations that the Commission may lawfully impose upon the Company's provision of service contemplated by this Petition. Upon Commission request, Q LINK is prepared to answer questions or present additional testimony or other evidence about its services within the state. Q LINK commits that 100% of federal universal service funds will flow through directly to Lifeline

customers. In accordance with 364.105 F.S., Q LINK will offer Transitional Lifeline service, and Q LINK will participate in the Lifeline Promotion Process required by Florida administrative code 25-4.0665(3).

## **VI. DESIGNATION OF Q LINK AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST**

One of the principal goals of the Act, as amended by the Telecommunications Act of 1996, is “to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies” to all citizens, regardless of geographic location or income.<sup>27</sup> Designation of Q LINK as an ETC in Florida will further the public interest by providing low-income Florida consumers with low prices and high quality services. Specifically, the Company will offer prepaid no-cost wireless service to low-income consumers, thereby increasing consumer choice and the Florida public’s access to telephone and broadband services through the availability of a new ETC designee in Florida. Many low-income customers have yet to reap the full benefits of the intensely competitive wireless market. Whether because of financial constraints, poor credit history or intermittent employment, these consumers often lack the countless choices available to most consumers.

The FCC has in recent years expanded the Lifeline program to cover broadband services, noting that “Only half of all households in the lowest income tier subscribe to a broadband service and 43 percent say the biggest reason for not subscribing is the cost of the service,” and “Of the low income consumers who have subscribed to mobile broadband, over 40 percent have to cancel or suspend their service due to financial constraints.”<sup>28</sup> According to a study conducted by USAC, as of December 2023 there were more than 38 million Lifeline-eligible Americans still unserved

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<sup>27</sup> *Telecommunications Act of 1996*, Pub. L. No. 104-104, 110 Stat. 56.

<sup>28</sup> See *Lifeline Modernization Order* ¶ 2.

by the Lifeline program, with only 11% of eligible Lifeline households being served in Florida.<sup>29</sup>

The instant request for ETC designation must be examined in light of the Act's goal of providing low-income consumers with access to telecommunications services. The primary purpose of universal service is to ensure that consumers—particularly low-income consumers—receive affordable and comparable telecommunications services. Given this context, designating Q LINK as an ETC would significantly benefit low-income consumers eligible for Lifeline service in Florida—the intended beneficiaries of universal service.

**A. Advantages of Q LINK's Service Offering**

The public interest benefits of the Company's wireless Lifeline service include larger local calling areas (as compared to traditional wireline carriers); the convenience, portability and security afforded by mobile telephone service; the opportunity for customers to control cost by receiving a preset amount of monthly airtime at no charge; the opportunity for customers to receive both the minimum service standards for voice *and* broadband usage within the same rate plan; the ability of users to use the supported service to send and receive "SMS" or text messages; the ability for customers to purchase additional usage at flexible and affordable amounts in the event that included usage has been exhausted (and the courtesy of free low-balance alerts); the opportunity for customers to receive service without going through a credit check or deposit requirement, or committing to a long-term service contract; and access to 911 and E911 (where available) service in accordance with current FCC requirements. Additionally, the inclusion of domestic long distance as a part of Q LINK's flat-rate wireless offerings allows consumers to avoid the risks of becoming burdened with significant and unexpected per-minute charges for domestic telephone toll and overage charges. These no cost to consumer services and low-cost minutes are an

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<sup>29</sup> See <https://www.usac.org/lifeline/learn/program-data/>.



invaluable resource for cash-strapped consumers, and the prepaid nature of the service also provides an alternative for “unbanked” consumers.

Q LINK’s Lifeline program will provide low-income Florida residents with the convenience and security offered by wireless services—even if their financial position deteriorates. Low-income individuals can greatly benefit from the advantages offered by the Company’s Lifeline service, which provides access to wholly-supported wireless service to assist in emergency situations, facilitate job search efforts, and to maintain contact with family members. It is a commonly accepted fact that in today’s market all consumers, including qualified Lifeline customers, view the portability and convenience of wireless service not as a luxury, but as a necessity. Mobile service allows children to reach their parents, wherever they may be, allows a person seeking employment the ability to be contacted by potential employers, and provides end users with the ability to contact emergency service providers, regardless of location. Q LINK’s prepaid wireless service is likely to be an especially attractive option for low-income consumers because it alleviates customer concerns regarding hidden costs, varying monthly charges and long-term contract issues. Providing Q LINK with the authority necessary to offer discounted Lifeline service to those most in danger of losing wireless service altogether undoubtedly promotes the public interest.

Q LINK’s Lifeline service includes mobile broadband access that meets the federal minimum service standards. Mobile service often also serves as a key bridge in closing the homework gap for students who live in rural areas with limited access to broadband. Q LINK’s business model is unique in that the Company is able to reach unserved and underserved Lifeline-eligible consumers, especially in less dense areas that have not been a focus of other Lifeline providers. With the comprehensive strength and experience of Q LINK’s management team, the Company’s

proven technology-based business model, and Q LINK's solid history as a Lifeline provider, Q LINK is uniquely-positioned to meet the needs of Lifeline customers, utilizing the Company's innovative outreach and high integrity enrollment process, and Q LINK remains committed to careful stewardship of the Lifeline program.

### **B. The Benefits of Competitive Choice**

The benefits to consumers of being able to choose from among a variety of telecommunications service providers have been acknowledged by the FCC for more than three decades.<sup>30</sup> Designation of Q LINK as an ETC will help assure that quality services are available at "just, reasonable, and affordable rates" as envisioned in the Act.<sup>31</sup> Introducing Q LINK into the market as an additional wireless ETC provider will afford low income Florida residents a wider choice of providers and available services while enhancing a competitive marketplace as ETCs compete for a finite number of Lifeline-eligible customers. Increasing customer choice promotes competition and innovation, thus spurring other carriers to target low-income consumers with higher-value service offerings tailored to their needs, resulting in improved services to consumers. Increasing the competitive marketplace of providers has the potential to effectively increase the penetration rate and reduce the number of individuals not connected to the PSTN.

### **C. Impact on the Universal Service Fund**

With Lifeline, ETCs only receive support for customers they obtain. The amount of support available to an eligible subscriber is exactly the same whether the support is given through a company such as Q LINK or the Incumbent LEC operating in the same service area. The number of persons eligible for Lifeline support is the same regardless of the number of ETCs; thus, Q LINK

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<sup>30</sup> See, e.g., *Specialized Common Carrier Services*, 29 FCC Rcd 870 (1971).

<sup>31</sup> See 47 U.S.C. § 254(b)(1).

will only increase the amount of USF Lifeline funding in situations where it obtains Lifeline customers not already enrolled in another ETC's Lifeline program. By implementing the safeguards set forth in the *Lifeline and Link Up Reform Order* and utilizing the NLAD and National Verifier, the likelihood that Q LINK's customers are not eligible or are receiving duplicative support either individually or within their household is greatly minimized. Q LINK's ability to increase the Lifeline participation rate of qualified low-income individuals will further the goal of Congress to provide all individuals with affordable access to telecommunications service, and thus any incremental increases in Lifeline expenditures are far outweighed by the significant public interest benefits of expanding the availability of affordable wireless services to low-income consumers.

## VII. CONCLUSION

Based on the foregoing, designation of Q LINK as an ETC in Florida satisfies the requirements of Section 214(e)(2) of the Act and is in the public interest.

WHEREFORE, Q LINK respectfully requests that the Commission promptly designate Q LINK as an ETC in Florida for purposes of participating in the Lifeline program.

Respectfully submitted,

*s/ Lance J.M. Steinhart*

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*Attorneys for Q LINK WIRELESS LLC*

April 16, 2024

**EXHIBIT 1**

**Certification of Company Officer**

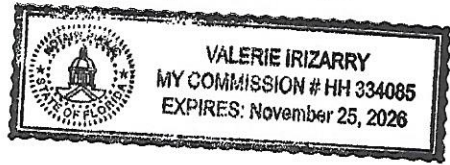
State of Florida )  
 )  
County of Broward )


### Certification

I, Issa Asad, the CEO of Q LINK WIRELESS LLC (“Q LINK”), have read the foregoing Petition for Eligible Telecommunications Carrier (“ETC”) designation (“Petition”) and know the contents thereof, and hereby certify as follows:

1. Q LINK meets all the statutory and regulatory requirements for designation as an ETC.
2. Q LINK agrees that all statements made and matters set forth in its Petition are true and correct to the best of Q LINK’s knowledge, information, and belief.
3. Q LINK will comply with the service requirements applicable to the low-income support it receives.

Dated: 4/11/24



  
\_\_\_\_\_  
Issa Asad, CEO  
Q LINK WIRELESS LLC

**EXHIBIT 2**

**FL Secretary of State Authority**

# State of Florida



## Department of State

I certify from the records of this office that Q LINK WIRELESS LLC, is a Delaware limited liability company authorized to transact business in the State of Florida, qualified on October 13, 2011.

The document number of this limited liability company is M11000005158.

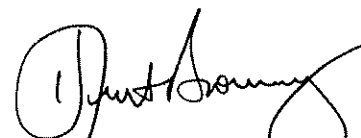
I further certify that said limited liability company has paid all fees due this office through December 31, 2011, and its status is active.

I further certify that said limited liability company has not filed a Certificate of Withdrawal.

Given under my hand and the  
Great Seal of the State of Florida  
at Tallahassee, the Capital, this the  
Second day of November, 2011



CR2EO22 (1-11)

  
Kurt S. Browning  
Secretary of State

**EXHIBIT 3**

**FCC-Approved Compliance Plan**





# PUBLIC NOTICE

Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

News Media Information 202 / 418-0500  
Internet: <http://www.fcc.gov>  
TTY: 1-888-835-5322

DA 12-1286

Release Date: August 8, 2012

## WIRESLINE COMPETITION BUREAU APPROVES THE COMPLIANCE PLANS OF BIRCH COMMUNICATIONS, BOOMERANG WIRELESS, IM TELECOM, Q LINK WIRELESS AND TAG MOBILE

### WC Docket Nos. 09-197 and 11-42

The Wireline Competition Bureau (Bureau) approves the compliance plans of five carriers: Birch Communications, Inc. (Birch); Boomerang Wireless, LLC (Boomerang); IM Telecom, LLC (IM); Q Link Wireless, LLC (Q Link); and TAG Mobile, LLC (TAG). The compliance plans were filed pursuant to the *Lifeline Reform Order* as a condition of obtaining forbearance from the facilities requirement of the Communications Act of 1934, as amended (the Act), for the provision of Lifeline service.<sup>1</sup>

The Act provides that in order to be designated as an eligible telecommunications carrier for the purpose of universal service support, a carrier must “offer the services that are supported by Federal universal service support mechanisms . . . either using its own facilities or a combination of its own facilities and resale of another carrier’s services . . . .”<sup>2</sup> The Commission recently amended its rules to define voice telephony as the supported service and removed directory assistance and operator services, among other things, from the list of supported services.<sup>3</sup> As a result of these amendments, many Lifeline-only ETCs that previously met the facilities requirement by providing operator services, directory assistance or other previously supported services no longer meet the facilities requirement of the Act.<sup>4</sup> In the *Lifeline Reform Order*, the Commission found that a grant of blanket forbearance of the facilities requirement, subject to certain public safety and compliance obligations, is appropriate for carriers

<sup>1</sup> See *Lifeline and Link Up Reform and Modernization et al*, WC Docket No.11-42 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd 6656, 6816-17 at paras. 379-380 (2012) (*Lifeline Reform Order*). A list of the compliance plans approved through this Public Notice can be found in the Appendix to this Public Notice.

<sup>2</sup> 47 U.S.C. § 214(e)(1)(A).

<sup>3</sup> See *Connect America Fund*, WC Docket No. 10-90 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, 17692-93, paras. 77-78, 80 (2011); *pets. for review pending sub nom. In re: FCC 11-161*, No. 11-9900 (10th Cir. filed Dec. 8, 2011); *Connect America Fund*, WC Docket No. 10-90 *et al.*, Order on Reconsideration, 26 FCC Rcd 17633, 17634-35, para. 4 (2011) (*USF/ICC Transformation Order on Reconsideration*).

<sup>4</sup> See *Lifeline Reform Order*, 27 FCC Rcd 6812, at para. 366, App. A; *USF/ICC Transformation Order on Reconsideration* at para. 4. Some ETCs have included language in their compliance plans indicating that they have facilities or plan to acquire facilities in the future. See, e.g., Blanket Forbearance Compliance Plan, WC Docket Nos. 09-197 and 11-42, Q Link Wireless, LLC’s Third Amended Compliance Plan at 4 n. 2 (filed July 30, 2012). To the extent ETCs seek to avail themselves of the conditional forbearance relief established in the *Lifeline Reform Order*, we presume they lack facilities to provide the supported service under section 54.101 and 54.401 of the Commission’s rules. See 47 C.F.R. §§ 54.101 and 54.401. Such ETCs must comply with the compliance plan approved herein in each state or territory where they are designated as an ETC, regardless of their claim of facilities for other purposes, such as eligibility for state universal service funding.

seeking to provide Lifeline-only service.<sup>5</sup> Therefore, in the *Lifeline Reform Order*, the Commission conditionally granted forbearance from the Act's facilities requirement to all telecommunications carriers seeking Lifeline-only ETC designation, subject to the following conditions: (1) compliance with certain 911 and enhanced 911 (E911) public safety requirements; and (2) Bureau approval of a compliance plan providing specific information regarding the carrier and its service offerings and outlining the measures the carrier will take to implement the obligations contained in the *Order*.<sup>6</sup>

The Bureau has reviewed the five plans listed in the Appendix for compliance with the conditions of the *Lifeline Reform Order*, and now approves those five compliance plans.<sup>7</sup>

Filings, including the Compliance Plans identified in the Appendix, and comments are available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12<sup>th</sup> Street, S.W., Room CY-A257, Washington, D.C. 20554. They may also be purchased from the Commission's duplicating contractor, Best Copy and Printing, Inc., Portals II, 445 12<sup>th</sup> Street, S.W., Room CY-B402, Washington, D.C. 20554, telephone: (202) 488-5300, fax: (202) 448-5563, or via email [www.bcpiweb.com](http://www.bcpiweb.com).

People with Disabilities: To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an email to [fcc504@fcc.gov](mailto:fcc504@fcc.gov) or call the Consumer & Governmental Affairs Bureau at (202) 418-7400 or TTY (202) 418-0484.

For further information, please contact Divya Shenoy, Telecommunications Access Policy Division, Wireline Competition Bureau at (202) 418-7400 or TTY (202) 418-0484.

- FCC -

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<sup>5</sup> See *Lifeline Reform Order*, 27 FCC Rcd 6813-6817 at paras. 368-381.

<sup>6</sup> See *id.* at paras. 373 and 389. Subsequently, the Bureau provided guidance for carriers submitting compliance plans pursuant to the *Lifeline Reform Order*. *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197 and 11-42, Public Notice, 27 FCC Rcd 2186 (Wireline Comp. Bur. 2012).

<sup>7</sup> The Commission has not acted on any pending ETC petitions filed by these carriers, and this Public Notice only approves the compliance plans of the carriers listed above. While these compliance plans contain information on each carrier's Lifeline offering, we leave it to the designating authority to determine whether or not the carrier's Lifeline offerings are sufficient to serve consumers. See *Lifeline Reform Order*, 27 FCC Rcd 6679-80, 6818-19 at paras. 50 and 387.

**APPENDIX**

<b>Petitioner</b>	<b>Compliance Plans As Captioned by Petitioner</b>	<b>Date of Filing</b>	<b>Docket Numbers</b>
Birch Communications, Inc.	Further Amended Compliance Plan of Birch Communications, Inc.	July 2, 2012	09-197; 11-42
Boomerang Wireless, LLC	Boomerang Wireless, LLC Revised Compliance Plan	July 26, 2012	09-197; 11-42
IM Telecom, LLC	IM Telecom, LLC d/b/a Infiniti Mobile Compliance Plan	July 5, 2012	09-197; 11-42
Q Link Wireless, LLC	Q Link Wireless, LLC's Third Amended Compliance Plan	July 30, 2012	09-197; 11-42
TAG Mobile, LLC	TAG Mobile, LLC Compliance Plan	July 26, 2012	09-197; 11-42

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**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of the	)	
	)	
Telecommunications Carriers Eligible for Universal Service Support	)	WC Docket No. 09-197
	)	
Lifeline and Link Up Reform and Modernization	)	WC Docket No. 11-42
	)	
Blanket Forbearance Compliance Plan	)	

**Q LINK WIRELESS LLC'S THIRD AMENDED COMPLIANCE PLAN**

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*Attorney for Q LINK WIRELESS LLC*

July 30, 2012

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**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of the	)	
	)	
Telecommunications Carriers Eligible for	)	WC Docket No. 09-197
Universal Service Support	)	
	)	WC Docket No. 11-42
Lifeline and Link Up Reform and Modernization	)	
	)	
Blanket Forbearance Compliance Plan	)	

**Q LINK WIRELESS LLC’S THIRD AMENDED COMPLIANCE PLAN**

**I. INTRODUCTION**

Q LINK WIRELESS LLC (“Q LINK” or the “Company”) is a prepaid wireless telecommunications carrier seeking designation as an Eligible Telecommunications Carrier (“ETC”) solely for the purpose of participating in the Lifeline program. Although Section 214(e)(1)(A) of the Act requires an ETC to offer USF-supported services to some extent over its own facilities, the Federal Communications Commission (“FCC” or “Commission”) has forbore from that requirement for carriers that are, or seek to become, Lifeline-only ETCs.<sup>1</sup> Q LINK will avail itself of the FCC’s conditional grant of forbearance and, by its attorney, hereby files its Third Amended Compliance Plan outlining the measures it will take to implement the conditions of forbearance outlined in the *Order*.<sup>2</sup> This Third Amended Compliance Plan replaces in its entirety Q LINK’s Second Amended Compliance Plan filed on April 12, 2012, and all other Compliance Plans

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<sup>1</sup> *In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) (“*Order*”).

<sup>2</sup> Although the Company qualifies for and seeks to avail itself of the Commission’s grant of forbearance from the facilities requirement of section 214(e)(1)(A) for purposes of the federal Lifeline program, the Company reserves the right to demonstrate to a state public utilities commission that it provides service using its own facilities in a state for purposes of state universal service funding under state program rules and requirements. The Company will follow the requirements of the Commission’s Lifeline rules and this Compliance Plan in all states in which it provides Lifeline service and receives reimbursements from the federal Low-Income fund.

previously filed by the Company. Given the severe economic environment that is forcing many low-income customers to forego wireless service, Q LINK respectfully requests expeditious approval of this plan so that the Company, upon designation as an ETC, may quickly deploy much-needed Lifeline services to qualified low-income customers.

## **II. BACKGROUND**

In the *Order*, the Commission granted forbearance from the “own-facilities” requirement contained in Section 214(e)(1)(A) for carriers that are, or seek to become, Lifeline-only ETCs, subject to the following conditions:<sup>3</sup>

(1) the carrier must comply with certain 911 requirements [(a) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; (b) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services; and (c) complying with conditions (a) and (b) starting on the effective date of this Order]; and

(2) the carrier must file, and the Bureau must approve, a compliance plan that: (a) outlines the measures the carrier will take to implement the obligations contained in this Order, including but not limited to the procedures the ETC follows in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the Fund, materials related to initial and ongoing certifications and sample marketing materials, as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary; and (b) provides a detailed description of how the carrier offers service, the geographic areas in which it offers service, and a description of the carrier’s various Lifeline service plan offerings, including subscriber rates, number of minutes included and types of plans available.

## **III. Q LINK WILL COMPLY WITH THE REQUIREMENTS SET FORTH IN THE ORDER**

Q LINK will comply with all conditions set forth in the *Order*, the provisions of this Compliance Plan, and all laws and regulations governing its provision of Lifeline-supported prepaid wireless service to customers throughout the United States.

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<sup>3</sup> See *Order* at ¶¶ 368, 373 and 379.



**A. Access to 911 and E911 Services**

In the *Order*, the Commission requires Q LINK to provide its Lifeline customers with access to 911 and E911 services, regardless of activation status and availability of minutes.<sup>4</sup> The Commission and consumers are hereby assured that all Q LINK customers will have available access to emergency calling services at the time that Lifeline service is initiated, and that such 911 and E911 access will be available from Q LINK handsets even if the account associated with the handset has no minutes remaining.

**B. E911-Compliant Handsets**

The Commission also conditioned its grant of forbearance determination on Q LINK providing only E911-compliant handsets to its Lifeline customers.<sup>5</sup> Q LINK will ensure that all handsets used in connection with the Company's Lifeline service offering are E911-compliant. In the event that an existing Q LINK customer does not have an E911-compliant handset, the Company will replace it with a new 911/E911-compliant handset at no charge to the customer. Any new customer that qualifies for and enrolls in the Lifeline program is assured of receiving a 911/E911-compliant handset as well, free of charge.

**C. Consumer Eligibility and Enrollment**

Q LINK will certify and verify consumer eligibility for Lifeline in accordance with the requirements set forth in the *Order*. In instances where a state agency or third-party administrator is responsible for the initial determination and annual recertification of consumer eligibility, Q LINK will rely on the state identification or database.<sup>6</sup> In instances where Q LINK is responsible for the initial determination and annual recertification of consumer eligibility, the Company will follow the procedures set forth below.

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<sup>4</sup> See *Order* at ¶ 373.

<sup>5</sup> See *id.*

<sup>6</sup> See *Order* at ¶ 98.

## 1. One-Per-Household

Q LINK understands that Lifeline is limited to a single subscription per household, and that the Commission has defined household as “any individual or group of individuals who are living together at the same address as one economic unit.”<sup>7</sup> Upon receiving an application for Lifeline support, Q LINK will check the duplicates database, once in place, to determine whether an individual at the applicant’s residential address is currently receiving Lifeline-supported service. Q LINK will also search its own internal database of active customers, real-time, pre-sale, to ensure that it does not already provide Lifeline-supported service to someone at that residential address.

If Q LINK determines that an individual at the applicant’s address is currently receiving Lifeline-supported service, Q LINK will take an additional step to ensure that the applicant and the current subscriber are part of different households. To enable applicants to make this demonstration, Q LINK will require applicants to complete and submit to the Company USAC’s one-per-household template, which will contain the following: (1) an explanation of the Commission’s one-per-household rule; (2) a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) a space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant’s household and share in the household’s expenses or benefit from the applicant’s income; and (4) the penalty for a consumer’s failure to make the required one-per-household certification (i.e., de-enrollment).<sup>8</sup> Q LINK will deny the Lifeline application of any individual residing at the same address as a current Lifeline subscriber who is part of the same household, and will advise the applicant of the basis for the denial.

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<sup>7</sup> See Order at ¶ 74.

<sup>8</sup> See Order at ¶ 78.

On its application certification forms, a sample of which is attached as Exhibit A,<sup>9</sup> Q LINK will obtain a consumer's permanent residential address (which cannot be a P.O. Box or General Delivery address), unless they only have a temporary address, and, if different, a billing address for the service (which may include a P.O. Box or General Delivery address).<sup>10</sup> Q LINK will inquire on its certification forms whether or not the address provided is temporary.<sup>11</sup> If so, Q LINK will notify the consumer that the Company will contact the consumer every 90 days, by phone or text, to verify that he or she continues to rely on that address, and that if the consumer fails to respond within 30 days of Q LINK's attempt to verify the temporary address, he or she will be de-enrolled from the Lifeline program. Also on its certification forms, Q LINK will explain that if the subscriber moves, they must provide their new address to the Company within 30 days of moving.<sup>12</sup> If the subscriber has moved, Q LINK will update the duplicates database, once in place, with the information within 10 business days of receipt of the information.<sup>13</sup>

As detailed below, Q LINK's certification form will clearly explain the one-per-household requirement and all consumers must certify that they receive Lifeline support for a single subscription per household.

## **2. Initial and Annual Certification**

Consumers will be signed up in person or directed, via company literature or advertising, to a toll-free telephone number and to the Company website, which will provide information regarding the Company's Lifeline service plans, including a detailed description of the program and state-specific eligibility criteria. Q LINK's application form will identify that it is a "Lifeline"

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<sup>9</sup> See Exhibit A. The sample certification form remains subject to change, but substantially reflects the content of the Company's application.

<sup>10</sup> See Order at ¶ 85.

<sup>11</sup> See Order at ¶ 89.

<sup>12</sup> See Order at ¶ 85.

<sup>13</sup> See *id.*

application. Q LINK will provide Lifeline-specific training to all personnel, whether employees, agents or representatives, that interacts with actual or prospective customers with respect to obtaining, changing, or terminating Lifeline services.

Q LINK's initial and annual certification forms will conform to the list of requirements provided in the *Order*, Appendix C and with C.F.R. § 54.410(d), as amended. Q LINK's Lifeline certification forms will require each prospective subscriber to provide the following information:

- (i) The subscriber's full name;
- (ii) The subscriber's full residential address;
- (iii) Whether the subscriber's residential address is permanent or temporary;
- (iv) The subscriber's billing address, if different from the subscriber's residential address;
- (v) The subscriber's date of birth;
- (vi) The last four digits of the subscriber's social security number, or the subscriber's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a social security number;
- (vii) If the subscriber is seeking to qualify for Lifeline under the program-based criteria, as set forth in § 54.409, the name of the qualifying assistance program from which the subscriber, his or her dependents, or his or her household receives benefits; and
- (viii) If the subscriber is seeking to qualify for Lifeline under the income-based criterion, as set forth in § 54.409, the number of individuals in his or her household.

The certification forms will also explain in clear, easily understandable language that:

- (i) Lifeline is a federal government benefit;
- (ii) Lifeline service is available for only one line per household;
- (iii) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses;
- (iv) households are not permitted to receive benefits from multiple providers;
- (v) that violation of the one-per-household requirement would constitute a violation of the Commission's rules and would result in the consumer's de-enrollment from the program, and potentially, prosecution by the United States government; and
- (vi) a Lifeline subscriber may not transfer his or her service to any other individual, including another eligible low-income consumer.

Q LINK will require all consumers, at sign up and annually thereafter, to certify under penalty of perjury that:

- (i) The subscriber meets the income-based or program-based eligibility criteria for receiving Lifeline, provided in § 54.409;

- (ii) The subscriber will notify the carrier within 30 days if for any reason he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the subscriber no longer meets the income-based or program-based criteria for receiving Lifeline support, the subscriber is receiving more than one Lifeline benefit, or another member of the subscriber's household is receiving a Lifeline benefit.
- (iii) If the subscriber is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands, as defined in 54.400(e);
- (iv) If the subscriber moves to a new address, he or she will provide that new address to the eligible telecommunications carrier within 30 days;
- (v) If the subscriber provided a temporary residential address, he or she will be required to verify his or her temporary residential address every 90 days;
- (vi) The subscriber's household will receive only one Lifeline service and, to the best of his or her knowledge, the subscriber's household is not already receiving a Lifeline service;
- (vii) The information contained in the subscriber's certification form is true and correct to the best of his or her knowledge,
- (viii) The subscriber acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and
- (ix) The subscriber acknowledges that the subscriber may be required to re-certify his or her continued eligibility for Lifeline at any time, and the subscriber's failure to re-certify as to his or her continued eligibility will result in de-enrollment and the termination of the subscriber's Lifeline benefits pursuant to § 54.405(e)(4).

Applicants will also be required to initial a number of disclosure statements intended to ensure that the applicant understands applicable eligibility requirements. Q LINK will verbally explain the certifications to consumers. With respect to those enrolling via the Internet, Q LINK will highlight the certifications that are required, for example, by requiring consumers to acknowledge each certification before moving on to the next field.<sup>14</sup> Consumers must return a signed application and support documentation to the Company by mail, fax, email, kiosk scan, or other electronic transmission. The Company will accept electronic signatures, including Interactive Voice Response (IVR) recordings, which meet the requirements of the Electronic Signatures in Global and National Commerce Act, 15 USC 7001-7006.<sup>15</sup>

Q LINK will determine eligibility, at a minimum, utilizing the income and program criteria currently utilized by federal default states (47 C.F.R. § 54.409(a), (b)), as well as any

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<sup>14</sup> See Order at ¶ 123.

<sup>15</sup> See Order at ¶ 168.

additional state-specific criteria. Prior to enrolling a new subscriber, Q LINK will check the eligibility of applicants first by accessing state or federal social services electronic eligibility databases, where available.<sup>16</sup> If a database is used to establish eligibility, Q LINK will not require documentation of the applicant's participation in a qualifying federal program; instead, Q LINK or its representative will note in its records what specific data was relied upon to confirm the applicant's initial eligibility for Lifeline.<sup>17</sup> However, in states where there is no state administrator, the state commission or other state agency is not making eligibility determinations, and there is no automated means for Q LINK to check electronic databases for eligibility, Q LINK will review documentation to determine eligibility for new subscribers until such time as a qualifying eligibility database is available.<sup>18</sup> Q LINK will require acceptable documentation both for income eligibility and program eligibility. The Company will not retain copies of the documentation but rather will establish policies and procedures to review such documentation and keep accurate records detailing how the applicant demonstrated his or her eligibility.<sup>19</sup> Q LINK understands that it may permit agents or representatives to review documentation of consumer program eligibility for Lifeline, and in such cases Q LINK remains liable for ensuring the agent or representative's compliance with the Lifeline program rules.<sup>20</sup>

### **3. Annual Re-Certification**

Q LINK understands that it must re-certify the eligibility of its entire Lifeline subscriber base as of June 1, 2012 by the end of 2012 and report the results to USAC by January 31, 2013, and the Company may elect to perform this re-certification on a rolling basis throughout the

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<sup>16</sup> See Order at ¶ 97.

<sup>17</sup> See Order at ¶ 98.

<sup>18</sup> See Order at ¶ 99.

<sup>19</sup> See Order at ¶ 101.

<sup>20</sup> See Order at ¶ 110.

year.<sup>21</sup> By December 31, 2012, Q LINK will re-certify the continued eligibility of all of its subscribers by contacting them – either in person, in writing, by phone, by text message, by email, or otherwise through the Internet – to confirm their continued eligibility.<sup>22</sup> The re-certification notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact Q LINK. Q LINK will obtain a signed certification from the subscriber that meets the certification requirements of 47 C.F.R. § 54.410(d), as amended, as detailed in section C.2 above. The Company will provide written notice of impending service termination to subscribers who do not respond to the annual re-certification within 30 days. Q LINK understands that such certifications may be obtained through a written format, an IVR system, or a text message, and will use one or more of such options for its certifications.<sup>23</sup>

Alternatively, where a database containing consumer eligibility data is available, Q LINK (or state agency or third-party, where applicable) will instead query the database by the end of 2012 and maintain a record of what specific data was used to re-certify eligibility and the date of re-certification. If a subscriber's address cannot be verified through the state data, Q LINK will contact the subscriber during the annual certification process to obtain a valid address.<sup>24</sup> After 2012, Q LINK will continue to annually certify the continued eligibility of its entire subscriber base, either by accessing a qualifying database, or by electing to have USAC administer the self-certification process on the Company's behalf.<sup>25</sup>

Q LINK will certify its compliance with Commission rules on an annual Lifeline eligible telecommunications carrier certification form and when submitting FCC Forms 497 to USAC for

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<sup>21</sup> See Order at ¶ 130.

<sup>22</sup> See *id.*

<sup>23</sup> See Order at ¶ 132.

<sup>24</sup> See Order at ¶ 131.

<sup>25</sup> See Order at ¶ 133.

reimbursement. As part of Q LINK's submission of re-certification data pursuant to 47 C.F.R. § 54.416, an officer of the Company will certify annually to USAC:

(1) that the Company has procedures in place to review consumers' documentation of income-and program-based eligibility. In instances where the Company confirms consumer eligibility by relying on official program eligibility data, such as a state or federal database, an officer of the Company will attest to what data the Company uses to confirm consumer eligibility in each state; and

(2) that the Company is in compliance with all federal Lifeline certification procedures.<sup>26</sup>

In addition, Q LINK will certify when seeking reimbursement that the Company has obtained a valid certification form for each customer for whom the Company seeks Lifeline reimbursement.<sup>27</sup>

#### **D. Additional Reforms to Eliminate Waste, Fraud and Abuse**

Q LINK shares the Commission's concern about abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that the procedures it will implement will prevent Company customers from engaging in such abuse of the program, inadvertently or intentionally. In an effort to prevent waste, fraud, and abuse, Q LINK has implemented procedures to identify and prevent fraud. The goals are to ensure integrity both in Q LINK, but also in the Lifeline program as a whole.

Q LINK has contracted with CGM, LLC of Roswell, Georgia, a Lifeline service bureau, to edit all subsidy request data. CGM will process and validate the Company's subsidy data to prevent: (1) Duplicate Same-Month Lifeline Subsidies (Double Dip): any name/address that is already receiving a lifeline subsidy from the Company will be automatically prevented from

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<sup>26</sup> See Order at ¶ 126-27.

<sup>27</sup> See Order at ¶ 128.



receiving a second lifeline subsidy in that same month; and (2) Inactive lines receiving subsidy: CGM's systems compare all subsidy requests to underlying network status to ensure that subsidies are requested only for active lines. Through the processes described herein, Q LINK ensures that it does not over-request from support funds.

For each applicant, Q LINK first validates the applicant's identity via a government issued ID card, passport, etc. Additionally, as mentioned above, Q LINK requires the applicant provide their date of birth (DOB) and last four digits of their social security number (SSN). Requiring DOB and SSN ensures that neither the applicant nor the Company representative can forge certification forms based on false names and addresses. Once the applicant's identity is confirmed, Q LINK verifies that the applicant is eligible to receive the Lifeline subsidy. To do this, Q LINK checks any available eligibility database. If one is not available, the applicant is required to provide proof of participation in one of the Lifeline eligible programs or proof that their annual household income is at or below 135% of the federal poverty guidelines. This prevents ineligible applicants from receiving the Lifeline subsidy.

The address of the applicant is then verified via a USPS/Melissa Database to ensure the address is correct. Simultaneously, the name/address combination is dipped into CGM's aggregate duplicate database to confirm that the applicant is not already receiving a Lifeline subsidy from Q LINK or any other CGM client. This is done through an API connection between Q LINK's provisioning platform and GCM. This allows the Company to ensure the applicant is not receiving a duplicate subsidy, as well as identify those who share an address with current Q LINK customers. This then prompts the representative to detail the one-per-household rule with the applicant, allowing the applicant to then certify they are head of household. Should Q LINK confirm that a household is receiving more than one subsidy, whether by information obtained from an applicant,

USAC's IDR process, or a national database, the customer will be immediately de-enrolled from the Lifeline program.

If and when Q LINK determines that an applicant is indeed eligible for the Lifeline program, the Company will ship a new or refurbished handset, dependent only upon availability, to the qualifying Lifeline customer along with materials explaining the use of the handset, Q LINK's terms and conditions, and disclosures regarding the Lifeline program. Handsets will not be shipped pre-activated. Qualifying Lifeline customers, upon receipt of the handset, must personally activate the handset by contacting Q LINK Customer Service either over the phone or via Internet.

#### **1. National Lifeline Accountability Database**

Q LINK will participate in the National Lifeline Accountability Database, once it is established. As required by the *Order*, Q LINK will provide to the database subscriber name, address, phone number, the last four digits of Social Security number, date of birth, Lifeline service initiation and de-enrollment date (when applicable), and amount of federal Lifeline support being sought for that subscriber.<sup>28</sup> Q LINK will provide the information listed above for existing subscribers within 60 days of Commission notice that the database is capable of accepting subscriber information.<sup>29</sup>

Furthermore, Q LINK will obtain acknowledgement and consent from each of its subscribers that is written in clear, easily understandable language that the subscriber's name, telephone number, and address will be disclosed to USAC and/or its agents for the purpose of verifying that the subscriber does not receive more than one Lifeline benefit.<sup>30</sup>

Within 30 days following Commission notice that the database is capable of accepting queries, Q LINK will query the database to check if a prospective subscriber is already receiving

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<sup>28</sup> See *Order* at ¶ 189.

<sup>29</sup> See *Order* at ¶ 190.

<sup>30</sup> See *Order*, Appendix C.

service from another ETC prior to seeking reimbursement from the Fund.<sup>31</sup>

## 2. Subscriber Usage

Q LINK will not seek reimbursement from the USF for new subscribers until they have personally activated the service, either by initiation and/or actual use of the service by the subscriber. Furthermore, Q LINK will not seek reimbursement from the USF for inactive subscribers who have not used the service for a consecutive 60-day period.<sup>32</sup> Q LINK will notify its subscribers at service initiation about the non-transferability of the phone service, its usage requirements, and the de-enrollment and deactivation that will result following non-usage in any 60-day period of time.<sup>33</sup> An account will be considered active if during any 60-day period the authorized subscriber does at least one of the following: makes a monthly payment; purchases minutes from the Company to add to an existing pre-paid Lifeline account; completes an outbound call; answers an incoming call from anyone other than the Company, its representative, or agent; or affirmatively responds to a direct contact from the Company confirming that he or she wants to continue.<sup>34</sup> Q LINK utilizes tracking software to notify the customer if the customer has not used their service for more than 30 or 60 consecutive days. Furthermore, a third party contractor validates the Company's subsidy data to prevent a subsidy request for customers that are inactive under the Company's non-usage policy.<sup>35</sup> After notification, if the customer fails to use their service, the customer is automatically de-enrolled pursuant to the procedures outlined in section E below. Q LINK will continue to comply with applicable public safety, including transmitting 911 calls to the appropriate PSAP even if the Company is no

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<sup>31</sup> See Order at ¶ 203.

<sup>32</sup> See Order at ¶ 257.

<sup>33</sup> See *id.*

<sup>34</sup> See Order at ¶ 261.

<sup>35</sup> CGM, LLC is currently the Company's third party contractor.

longer providing Lifeline service to a consumer.<sup>36</sup>

### **3. Marketing & Outreach**

Q LINK will implement the measures outlined herein to help ensure that only eligible consumers enroll in the program and that those consumers are fully informed of the limitations of the program, so as to prevent duplicative or otherwise ineligible service as well as other forms of waste, fraud, and abuse. Q LINK will explain in clear, easily understood language the following disclosures in all marketing materials related to the supported service:<sup>37</sup> (1) that only eligible consumers may enroll in the program; (2) that the program is limited to one benefit per household, consisting of either wireline or wireless service; (3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; and (4) that Lifeline is a government benefit program. Q LINK will prepare printed material that will explain the documentation necessary for enrollment, and the details of the Company's plans, and will provide such information on its website. Such material and website information, as well as its application, will make clear that consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.<sup>38</sup> For broadcast advertisements and outdoor signage, such as billboards, and any other situation in which inclusion of documentation information and warnings against willful false statements are impractical, Q LINK, will provide the URL link for the information disclosure page on its website. Additionally, Q LINK will

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<sup>36</sup> See Order at ¶ 262. 911 transmissions will actually be performed by the Company's underlying facilities-based CMRS provider.

<sup>37</sup> See Exhibit B for sample marketing materials. The Company understands the term "marketing materials" includes materials in all media, including but not limited to print, audio, video, Internet (including email, web, and social networking media), and outdoor signage, that describe the Lifeline-supported service offering, including application and certification forms. See Order at ¶ 275.

<sup>38</sup> See Order at ¶ 275.

disclose the company name under which it does business.<sup>39</sup> In order to reinforce the limitation of one Lifeline phone per household, the following statement, or words to the same effect, will appear in the Company's marketing materials and website (www.qlinkwireless.com) in a conspicuous place, in bold font and in an offsetting color to ensure it is not overlooked:

**Lifeline support is limited to one per household on wireline or wireless service.**

#### **4. Audits**

If Q LINK draws \$5 million or more in the aggregate on an annual basis from the low-income program, as determined on a holding company basis taking into account all operating companies and affiliates, the Company will hire an independent licensed certified public accounting firm to conduct a biennial audit according to government accounting standards to assess Q LINK's overall compliance with the program's requirements.<sup>40</sup> Q LINK will comply with applicable rules regarding the dissemination of audit findings to the Commission, USAC, and relevant state and Tribal governments within 30 days upon issuance.<sup>41</sup>

#### **E. De-Enrollment**

If at any time a Q LINK Lifeline customer wishes to de-enroll from the Company's Lifeline program, Company customer service representatives will handle such elective de-enrollment requests. Q LINK Lifeline customers simply call the Company's toll-free customer service number and they can speak to a live operator to de-enroll from Q LINK's Lifeline program. Q LINK will de-enroll consumers from the Company's Lifeline program in the following instances, according to C.F.R. § 54.405(e):

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<sup>39</sup> See *id.*

<sup>40</sup> See *Order* at ¶ 291.

<sup>41</sup> See *Order* at ¶ 294.

Ineligibility. Any subscriber who indicates that he or she is receiving more than one Lifeline-supported service per household, or neglects to make the required one-per-household certification on his or her certification form, will be de-enrolled from Lifeline pursuant to the process for resolving duplicative Lifeline subscriptions described in section 54.405(e)(2).<sup>42</sup>

If a customer does not respond to the Company's annual verification survey within 30 days, or if Q LINK has reasonable basis to believe that the subscriber no longer meets the Lifeline-qualifying criteria (including instances where a subscriber informs the Company or the state that he or she is ineligible for Lifeline), Q LINK will provide a written notice of impending service termination to the subscriber and then give the subscriber 30 days after the date of the letter to demonstrate that his or her Lifeline service should not be terminated.<sup>43</sup> Similarly, Q LINK will de-enroll a subscriber if they fail to respond to the Company's attempt to verify a temporary address within 30 days.<sup>44</sup>

Duplicative Support. Subject to USAC's Duplicate Resolution Process and anticipated Duplicate Scrubbing Process,<sup>45</sup> Q LINK will de-enroll a subscriber within 5 business days if the Company is informed by USAC that the subscriber is receiving Lifeline service from another ETC or that more than one member of a subscriber's household is receiving Lifeline service.

Non-Usage. Q LINK will monitor all customers to ensure that they in fact have usage on their account within a 60-day period. Q LINK will de-enroll any subscriber that has not used the Company's Lifeline service for 60 consecutive days, as discussed in section IV.B above. Q LINK will send the subscriber a 30-day termination letter, using clear, easily understood language, notifying the subscriber that failure to use the Lifeline service within the 30-day cure

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<sup>42</sup> See Order at ¶ 122.

<sup>43</sup> See *id.* In states that have dispute resolution procedures applicable to Lifeline termination, the Company will comply with the state requirements.

<sup>44</sup> See Order at ¶ 89.

<sup>45</sup> See Order at ¶ 214-16.

period will result in service termination for non-usage. The subscriber will be able to confirm that they want to continue receiving their Lifeline service. Q LINK will update the national database, once in place, within one business day of de-enrolling a subscriber for non-use and will submit a non-usage de-enrollment report annually to USAC.<sup>46</sup> Q LINK will not seek reimbursement from the USF during the 30-day cure period unless the subscriber confirms they want to continue service.

## **F. Additional Rule Amendments**

### **1. Reporting Requirements**

Q LINK will report all information required by section 54.422, as it may heretofore be amended. This includes the names of the Company's holding company, operating companies and affiliates, and any branding ("doing-business-as company" or brand designation), and provide to the Commission and USAC general information regarding the terms and conditions of the Lifeline plans for voice telephony service offered specifically for low income consumers through the program offered during the previous year, including the number of minutes provided, and whether there are additional charges to the consumer for service, including minutes of use and/or toll calls.<sup>47</sup>

### **2. Reimbursements from USAC**

In seeking reimbursement for Lifeline, Q LINK will comply with the requirements of C.F.R § 54.407, as revised by the *Order*.<sup>48</sup> Q LINK will certify when seeking reimbursement that the Company has obtained a valid certification form for each consumer for whom the Company

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<sup>46</sup> See *Order* at ¶ 257.

<sup>47</sup> See *Order* at ¶ 296, 390. Section 153 of the Communications Act defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person.

<sup>48</sup> See *Order* page 221.

seeks Lifeline reimbursement;<sup>49</sup> and the Company will seek reimbursement for actual lines served, not projected lines.<sup>50</sup>

### **3. Section 54.202 Certifications**

Q LINK certifies the following in accordance with newly amended C.F.R. § 54.202: (1) Q LINK will comply with the service requirements applicable to the support that it receives; (2) Q LINK is able to remain functional in emergency situations; and (3) Q LINK will satisfy applicable consumer protection and service quality standards.

## **IV. COMPANY INFORMATION**

Q LINK is a Limited Liability Company organized in the State of Delaware on August 25, 2011. Q LINK will provide prepaid wireless telecommunications services by using the Sprint Nextel (“Sprint”) network on a wholesale basis to offer nationwide service. Sprint is a nationwide carrier that provides wholesale capacity on its wireless network to wireless providers like Q LINK. Q LINK will obtain from Sprint the network infrastructure and wireless transmission facilities to allow Q LINK to operate as a Mobile Virtual Network Operator (“MVNO”). Q LINK was designated as an ETC in Maryland on December 21, 2011. Q LINK does not currently provide service in any state.

### **A. Names and Identifiers**

The Company’s legal name is Q LINK WIRELESS LLC. Q LINK’s holding company is QUADRANT HOLDINGS GROUP LLC. The Company does not have any operating companies and it identifies itself as Q LINK or Q LINK WIRELESS on its marketing and advertising materials.

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<sup>49</sup> See Order at ¶ 128.

<sup>50</sup> See Order at ¶ 302.



## **B. Financial and Technical Capability**

Q LINK is financially and technically capable of providing Lifeline-supported services.<sup>51</sup> Q LINK will provide service to both Lifeline and non-Lifeline customers. Q LINK intends to launch its retail and Lifeline wireless service simultaneously. Q LINK has not been subject to enforcement action or ETC revocation proceedings in any state. Q LINK is financially able to provide Lifeline-supported services and will not rely exclusively on USF disbursements to operate.<sup>52</sup> Furthermore, the senior management of Q LINK has great depth in the telecommunications industry and offers extensive telecommunications business technical and managerial expertise to the Company.<sup>53</sup> Q LINK will also rely upon the managerial and technical expertise of its underlying carrier Sprint.

## **C. Lifeline Offering**

Q LINK will offer its Lifeline service in the states where it is designated as an ETC and throughout the coverage area of its underlying carrier Sprint. As summarized in Exhibit E attached hereto, the Company's Lifeline offering will provide customers with the option to choose between three (3) Lifeline Plans<sup>54</sup> that best meets their needs:

1. Plan 1: 68 Monthly Minutes. Under Plan 1, eligible customers enjoy 68 anytime minutes that rollover and free international long distance.<sup>55</sup> Text messaging is at the rate of one-third of one minute (3 texts = 1 minute).

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<sup>51</sup> See Order at ¶ 387.

<sup>52</sup> See Exhibit C for QUADRANT HOLDINGS GROUP LLC'S Financial Statements. This information is **CONFIDENTIAL AND PROPRIETARY** and is being filed under seal as such.

<sup>53</sup> See Exhibit D for key management resumes.

<sup>54</sup> Q LINK's Lifeline Plans vary from state to state in accordance with state requirements or Tribal offerings; the three Lifeline plans outlined in this compliance plan are the offerings available in most states. Please see the Company's website ([www.qlinkwireless.com](http://www.qlinkwireless.com)) for more detailed information regarding plans available in each state.

<sup>55</sup> If you are on Plan 1, there is no additional charge for international long distance to countries designated at [www.qlinkwireless.com](http://www.qlinkwireless.com).

2. Plan 2: 125 Monthly Minutes. Under Plan 2, eligible customers enjoy 125 anytime minutes that rollover. Text messaging is at the rate of one minute (1 text = 1 minute).
3. Plan 3: 250 Monthly Minutes. Under Plan 3, eligible customers enjoy 250 anytime minutes. Minutes do not rollover. Text messaging is at the rate of one minute (1 text = 1 minute).

Customers have the capability of purchasing additional bundles of minutes in denominations as low as \$9.99, \$19.99, \$29.99, and \$59.99.<sup>56</sup> Airtime replenishment cards will be made available at retail outlets frequented by low-income customers throughout the Company's Service Area. In addition to free voice services, all of Q LINK's Lifeline plans will include a free handset and the following Custom Calling features: Caller ID, Call Waiting, and Voicemail. Q LINK does not impose burdensome credit checks or long-term service contracts on its prepaid customers. Customers are not bound by a local calling area requirement; all Q LINK plans come with domestic long distance at no extra per minute charge and exceptional nationwide digital coverage on the Nationwide Sprint PCS Network. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes. Calls to Q Link customer service are also free. Q LINK has attached as Exhibit F its Lifeline terms and conditions of service. The terms and conditions of the Company's plans can also be found at [www.qlinkwireless.com](http://www qlinkwireless.com).

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<sup>56</sup> \$9.99 = 50 minutes, \$19.99 = 120 minutes, \$29.99 = 200 minutes, and \$59.99 = 450 minutes.

V. **CONCLUSION**

Q LINK submits that its Compliance Plan fully satisfies the conditions of forbearance set forth in the Commission's *Order*. Implementation of the procedures described herein will promote public safety and should ensure that Lifeline customers have access to 911 and E911 services while safeguarding against misuse of the Company's Lifeline services. Accordingly, Q LINK respectfully requests that the Commission expeditiously approve its Compliance Plan so that the Company may begin providing the benefits of much-needed Lifeline service to qualifying low-income consumers as quickly as possible.

Respectfully submitted,

Q LINK WIRELESS LLC

/s/ LANCE STEINHART

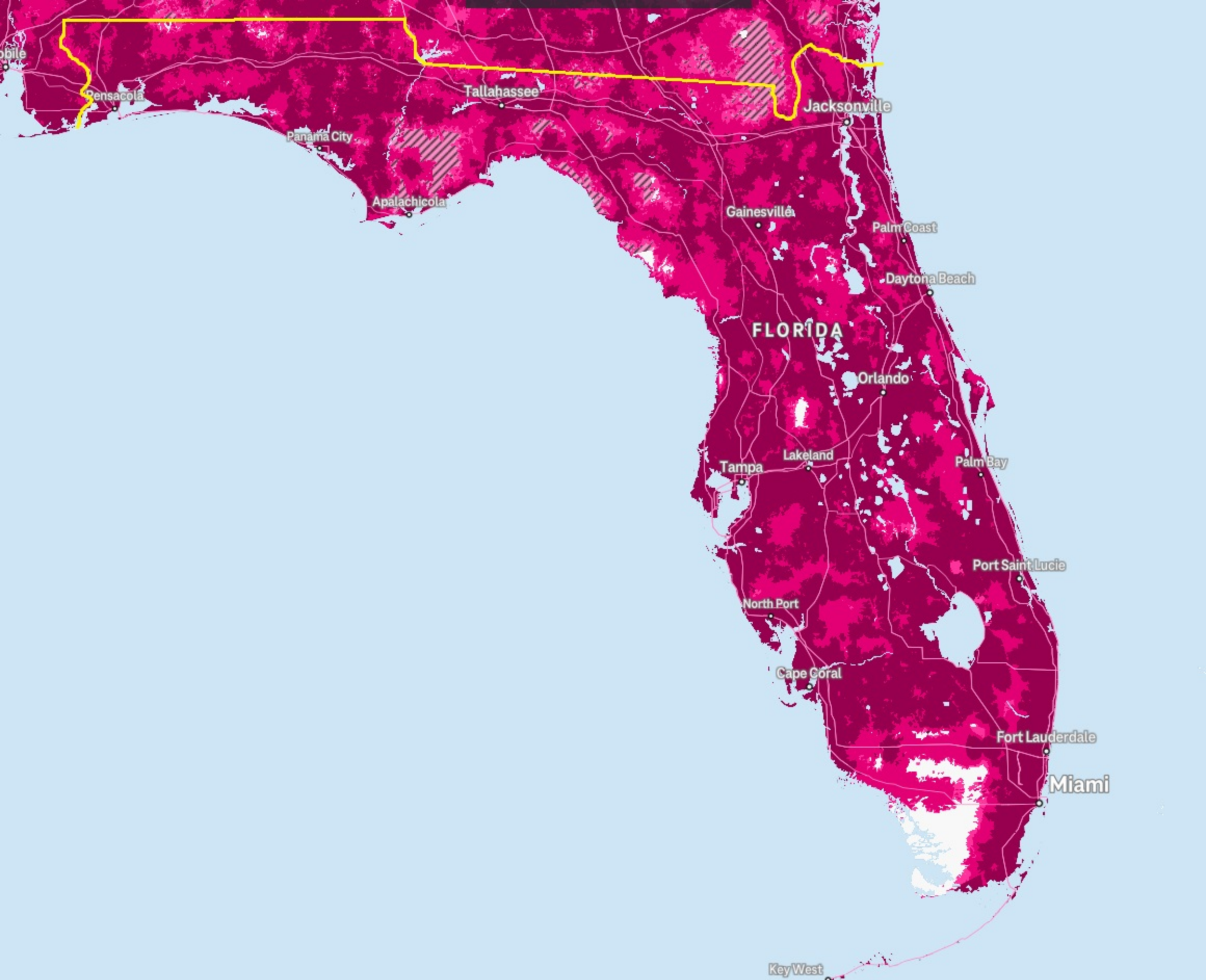
---

Lance J.M. Steinhart  
Lance J.M. Steinhart, P.C.  
1725 Windward Concourse  
Suite 150  
Alpharetta, Georgia 30005  
(770) 232-9200

*Its Counsel*

Dated July 30, 2012

**EXHIBIT 4**  
**Coverage Map**



**EXHIBIT 5**

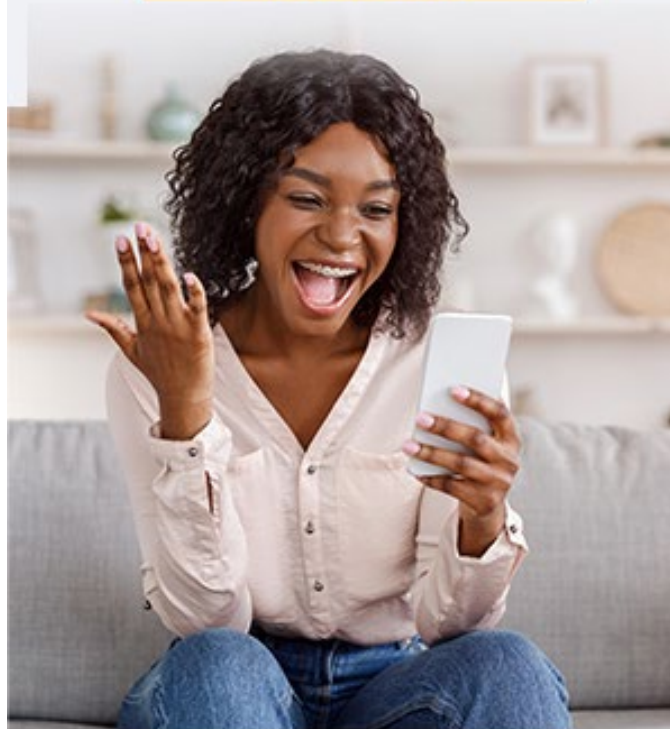
**Sample Advertisement**



# FREE MONTHLY SERVICE: 4.5GB OF DATA, 1000 MINUTES & UNLIMITED TEXTING

 GOVERNMENT BENEFIT PROGRAM

**SIGN UP TODAY!**



MUST BE ELIGIBLE TO ENROLL. [CLICK TO VIEW DISCLOSURE](#)

Q Link Wireless is a provider of Lifeline, a non-transferable federal benefit program. You must be eligible to enroll. Lifeline support is limited to one per household on wireline, wireless, or broadband service. If your household's income is at or below 135 percent of the federal poverty guidelines, or if you participate in a qualifying federal assistance program, you may be eligible for a Lifeline Program discount. Proof of eligibility will be required during enrollment. To view terms visit <http://www.qlinkwireless.com>

**EXHIBIT 6**

**Key Management Bios**





## **ISSA ASAD**

***Managing Member***  
**Quadrant Holdings Group, LLC.**

***Founder and Chief Executive Officer***  
**Q Link Wireless, LLC.**

***Founder and Chief Executive Officer***  
**Hello Mobile Telecom, LLC.**

**Issa Asad** is an experienced entrepreneur, businessman, and marketing strategist residing in the Dania Beach, Florida area. With over 20 years of experience in telecommunications, marketing, and technology industries, Issa's companies have produced continuous yearly profit growth in highly competitive domestic and international markets. He is the Founder, Managing Member, Chief Executive Officer and President of several telecom and technology companies, including, Quadrant Holdings, LLC (founded 2011); Q Link Wireless, LLC a subsidiary of Quadrant Holdings (founded 2011); Hello Mobile Telecom, LLC (founded 2018); and Reliable Telecard (founded 1998).

Before devoting himself to the telecom industry, Issa was an entrepreneur from the start. He began in retail at the early age of 24 as owner, operator, and developer of convenience stores and gas stations across New York and Florida. With vision and entrepreneurial spirit, he was the first gas station owner to offer fast food in his network of privately owned stores, beginning with Fine Foods Supermarkets in Miami, Florida. As President and CEO of the South Florida Grocers Association, Issa led the industry to incorporate Point of Sale, Cashless ATMs, Prepaid Calling Cards and check cashing services within grocery stores and gas stations.

Issa's career shifted into the telecom industry in the late 1990s, when he noticed an unexplored opportunity to provide prepaid phone cards for low-income Americans with families abroad. Issa began selling phone cards in his stores, and in the spring of 2000, he revolutionized the entire prepaid phone card industry when he founded Reliable Telecard and co-founded I-Prepay, Inc. Under Issa's leadership, these companies were the first to use touch-screen technology to develop and successfully distribute a real-time PIN delivery system with electronic point-of-sale solutions and physical distribution of phone cards, prepaid wireless products, bill payment processing, and other digital services.

The I-Prepay technology set the industry standard for the distribution of prepaid telecommunication services and products, and catalyzed a complete market restructuring, leading to record sales, revenues, and growth of the industry as a whole. Issa's own

unparalleled telecom marketing victories followed. With his passionate and strategic professional vision, he founded and helmed several of the nation's most esteemed telecom, technology, and Internet companies.

Issa's recent achievements include his sweeping success as CEO and founder of Q Link Wireless, Managing Member of Quadrant Holdings, President of QLixar Mobile Advertising Company, and CEO and founder of Hello Mobile. In only 6 years, Issa has directed Q Link Wireless to become the third largest Lifeline provider in the United States, is fully self-funded with zero debt, and services approximately 2.8M customers nationwide.

Issa has been featured in many technology-based publications. *Intelecard News* profiled Issa as a telecommunications executive with "real vision" and the *Prepaid Press* newspaper featured Issa as a "Telecom Mover of the Month" and labeled him as a "playmaker"—one of the "top telecommunications executives" in United States. He has also been recognized by *Who's Who in Telecom*, has authored several books, owns a variety of social media and e-commerce marketing blogs, and has been recognized in several news publications for his ongoing commitment to both customers and community.

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E-mail: [issa@quadrantholdings.com](mailto:issa@quadrantholdings.com)  
499 E Sheridan St, Suite 400  
Dania, FL 33004

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## SENIOR EXECUTIVE SUMMARY

Entrepreneur and senior sales executive with 22-year accomplished track record and known throughout the prepaid and telecom industry for delivering and sustaining revenue and profit gains with highly competitive domestic and international prepaid products, including domestic and international prepaid telephone and wireless calling cards and national distribution channels markets. By age 30, had pioneered what is now a multi-hundred million dollar a year prepaid industry. Practical experience in and solid understanding of a diverse range of business management applications, including market analysis, sales and marketing, team building and quality assurance. Demonstrated ability to select, train and retain self-motivated customer-oriented employees. Exceptional problem-solving skills, keen client needs assessment aptitude, high-caliber presentation, negotiation and closing skills.

Strategic & Tactical Planning  
Mergers & Acquisition  
Strategic Partnerships & Alliance  
Broker & Vendor Relations

Business Expansion & Startups  
Staff Management & Development  
Sales Presentations & Closing  
Account Development & Acquisition

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## PROFESSIONAL EXPERIENCE

### QUADRANT HOLDINGS GROUP, LLC – DANIA, FL

**Managing Member**, January 2011 - Present

Quadrant Holdings serves as the Managing Member entity of Q Link Wireless, LLC., and other telecom companies.

### Q LINK WIRELESS, LLC – DANIA, FL

**Founder and CEO**, January 2011 - Present

Q Link Wireless, LLC., is the third largest provider of government assisted wireless service nationwide, offering prepaid wireless and discounted Lifeline phone service to low income families and individuals, ensuring vulnerable populations have consistent and reliable phone service with 24-hour access to manned 911 operators. Q Link Wireless is the largest rural Lifeline provider in the nation. In-house technology infrastructure integrates directly with Sprint's network to offer consumers industry-leading service worldwide. Q Link Wireless provides quality wireless service and customer support to approximately 2.8M customers and has revenues exceeding \$2 million. As of June 2020, Q Link Wireless is ETC approved in 31 states. Q Link Wireless serves as the Managing Member entity of both Qlixar Corporation (a mobile advertising company) and Hello Mobile Telecom, LLC., (a MVNO).

- Developed and evolved sales model, including strategy, process, partnerships, organization, and execution to deliver financial and market share goals and achieve sustained profitable growth.
- Established direct working relationships with fortune 500 companies such as Facebook, Google, and Bing to reach consumers in un-serviced areas of the market, resulting in 85% of its enrollees being new to the Lifeline program.
- Self-funded Q Link Wireless and carries no company debt.
- Built, trained, and managed a results-orientated staff of high-level managers to oversee sales, marketing, compliance, shipping, technology, and a customer service team of over 150 dedicated employees providing live in-house support via phone, email, chat, and social media.
- Architected and manages the industry's most sophisticated Lifeline technology platform, with an expert team of in-house coders and developers.

## **PROFESSIONAL EXPERIENCE (Cont'd)**

### **HELLO MOBILE TELECOM, LLC., MIAMI, FL**

Founder and CEO, July 2017 – Present

Hello Mobile Telecom, LLC., a new technology driven MVNO, is a national, innovative prepaid wireless phone service provider that removes the need to visit retail outlets to obtain reliable and affordable cell phone service. Hello Mobile reaches its customer via cutting edge digital marketing and provides excellent customer service through its cutting-edge internet portal hellomobile.com and in-house customer support department. Prepaid wireless customers can switch to Hello Mobile and break free from higher phone bills and long-term contracts with free unlimited calling to over 60 countries and automatic connection to free WiFi at over 10 million locations.

- Developed and evolved a technology based sales model, including strategy, process, partnerships, organization, and execution to deliver financial and market share goals and achieve sustained profitable growth in the very competitive prepaid wireless industry.
- Established direct working relationships with fortune 500 companies such as Facebook, Google, and Bing to reach consumers in the prepaid wireless market via innovative digital marketing campaigns.
- Self-funded Hello Mobile Telecom as a new national prepaid wireless company with no debt.
- Built, trained, and managed a results-orientated staff of high-level managers to oversee sales, marketing, shipping, technology, and a customer service team of over 150 dedicated employees providing live in-house support via phone, email, chat, and social media.
- Architected and manages a new leading edge prepaid wireless industry provider with a proprietary technology platform and an expert team of in-house coders, developers and digital marketers.

### **QLIXAR CORPORATION, MIAMI, FL**

Founder and CEO, Sept 2017 – Present

QLixar Corporation is a leading mobile advertising company with 2 million customers nationwide. Its QLixar rewards smart app allows wireless phone service customers to collect free rewards every week that can be used to earn free wireless data, minutes and SMS and get coupons for Amazon.com, Google Play, PayPal and Walmart.

- Built, launched and successfully grew a new national, leading mobile advertising company.
- Developed and marketed its QLixar app, used by mobile advertising customers across the U.S., to earn free wireless minutes, data and SMS, and get coupons to spend on Amazon.com, Google Play, PayPal and Walmart.
- Built, trained, and managed a results-orientated expert team of in-house app creators and developers to launch and grow a national base of mobile advertising customers who can earn valuable free benefits.

### **RELIABLE TELECARD – MIAMI, FL**

CEO, President and Founder, 2000 - 2016

A leading provider of wholesale and retail telecommunications services. Reliable Telecard uses its own network infrastructure to route calls worldwide. The company's prepaid retail cards (topping 100 brands) are available at over 250,000 points of sale nationwide.

- Grew and maintained client base of 9,000 distributors and 300 worldwide outlets.
- Managed a staff of 150 employees.
- Gross annual revenues exceeding \$50M.

## **IPREPAY, INC. – MIAMI, FL**

**VP of Sales & Co-Founder**, January 2000 - 2008

Provided wholesale long distance, prepaid point of sale services including prepaid wireless, prepaid calling cards, bill pay, FTD flowers, Prepaid Visa Card, Prepaid Discover Card and an array of stored value products and services for carriers and end-users.

- Developed and evolved the sales model including strategy, process, partnerships, organization, and execution to deliver financial and market share goals and achieve sustained profitable growth.
- Recruited, trained and managed results-orientated staff of professional managers to oversee sales and marketing efforts.
- Increased 2004 gross revenues from \$20M to 2006 run-rate of \$75M.

## **X CHANGE COMMUNICATIONS – MIAMI, FL**

**Strategic Business Partner**, 2000 - 2008

Powerhouse Company with over 150 employees in a 40,000 square foot office campus in Miami, Florida. X Change was capable of handling 8 billion calling minutes per month through a state of the art system, completely designed and developed by strategic partners and X Change's in-house software engineers.

- Facilitated partnership with top carriers.
- 1<sup>st</sup> year partnership revenues exceeded \$85M.

## **PREPAID TECHNOLOGIES – MIAMI, FL**

**CEO, President and Founder**, 1996 - 2001

Prepaid Technologies aligned with qualified national processors and issued cards through a variety of national banks. Prepaid Technologies provided host-based stored value cards that were packaged and marketed as gift cards, travel cards, payroll cards, incentive reward cards, student cards, e-cards, vendor payment cards, and expense cards.

- Responsible for securing national prepaid distribution channels.
- 1<sup>st</sup> year profits exceeding \$600K.

## **WORLDCOM – MIAMI, FL**

**Director of Sales**, 1995 - 1996

Facilities-based network operator managed one of the world's largest communications network systems. One of the largest carriers of international voice traffic operating a leading Internet protocol backbone system.

- Secured exclusive prepaid phone card deal with Michael Jordon generating over \$1B in gross revenues with over \$350M in revenues during the 1<sup>st</sup> year.

## **FINE FOODS SUPERMARKETS – MIAMI, FL**

**CEO, President and Founder**, 1991 - 1999

- Designed, developed, opened, and maintained 12 retail chain grocery stores.

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## **PUBLICATIONS:**

Asad, Issa. (2014) *Instant Profits with Alibaba: Cash in On the World's Largest Economy – China*

Asad, Issa. (2014) *Instant Profits with Instagram: Build Your Brand, Explode Your Business*

Asad, Issa. (2014) *Instant Profits with Snapchat: How to Use Snaps to Boost Your Sales Fast*

Asad, Issa. (2014) *Instant Profits with Vine: How to Grow Your Business in Just 6 Seconds*

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## APPOINTMENTS:

National Lifeline Association (NaLA), Board of Directors, 2019- Present.  
Nova South Eastern University, Gold Shark Appointment, 2019 – Present.  
University of Miami, Alumni Donors Board of Directors, 2018 – Present.  
CITA Wireless Association, Ember Appointment, 2017 – Present.

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## NOMINATIONS:

South Florida Power Leader, Biz Journal, 2019.  
Top 500 Growing Private Companies, (*Q Link Wireless*), Inc.com, 2017.  
Top 1000 Growing Private Companies, (*Q Link Wireless*), Inc.com, 2016.  
Top 5000 Growing Private Companies, (*Q Link Wireless*), Inc.com, 2015.

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## MEDIA RECOGNITION

### NEWS:

Sun Sentinel News	Recognized for Boost Mobile Bid, 2019.
Sun Sentinel News	Recognized for Hello Mobile's low-cost international calling, 2019.
Sun Sentinel News	Recognized for Hurricane Harvey Relief Efforts, 2017.
CBS Miami	Recognized for Hurricane Harvey Relief Efforts, 2017.
7 News Miami	Recognized for Hurricane Harvey Relief Efforts, 2017.

### MAGAZINES:

Phone Plus	Recognized in 10 issues since 2002.
Intel-Card News Magazine	Recognized in 48 issues since 2000.
Convenience Store Decisions	Recognized in 1997 and 1998.
Convenience Store News	Recognized in 1997 and 1998.
Vending Times	Recognized in 1995.

### ELECTRONIC NEWS PUBLICATIONS:

Best MNVO	Recognized in 2019.
Capital Soup	Recognized in 2019.
Prepaid Phone News	Recognized in 2019.
Open Port	Recognized in 2019.
Reuters	Recognized in 2019.
Business Insider	Recognized 2 times since 2018.
Biz Journals	Recognized in 2018.
EPN Enterprise Podcast Network	Recognized in 2018.
Fierce Wireless	Recognized 3 times since 2018.
Medium	Recognized in 2018.
One Million by One Million Blog	Recognized in 2018.
Yahoo Finance	Recognized over 4 times since 2018.
City Lab	Recognized in 2017.
CBS Miami	Recognized over 20 times since 2015.
PRNewswire	Recognized over 20 times since 2014.
Telecom Reseller	Recognized in 2014.
Benzinga	Recognized over 4 times since 2013.
PRWeb	Recognized 5 times since 2013.

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## **EDUCATION**

### **UNIVERSITY OF MIAMI – MIAMI, FL**

B. S . Science

A.A. Business Management

### **FLORIDA INTERNATIONAL UNIVERSITY – MIAMI, FL**

A.A. Physiology



## **RAFAEL CARVAJAL**

*Chief Operating Officer*  
Q Link Wireless LLC

*Acting Chief Financial Officer*  
Q Link Wireless LLC

*Former Chief Operating Officer*  
Telefónica, S.A.

**Rafael Carvajal** is an experienced business executive residing in the Miami, Florida area. Mr. Carvajal has extensive experience in general management, finance, strategic planning, business development, startup operations, mergers and acquisitions and investment banking. Mr. Carvajal has built a professional reputation for innovative strategic thinking, operational excellence and a passionate commitment to his clients and employers.

Mr. Carvajal currently serves as the Chief Operating Officer and acting Chief Financial Officer for Q Link Wireless, LLC, a telecommunications company based in Dania Beach, Florida. In this role, Mr. Carvajal is responsible for the day-to-day operations of the business. Additionally, as acting Chief Financial Officer, he also manages the company's finance activities such as business planning, budgeting and forecasting. Mr. Carvajal's wealth of knowledge and experience has made him an invaluable asset to the Q Link Wireless team.

Before joining Q Link Wireless, Mr. Carvajal worked with Telefónica, an international telecommunications company with \$125 million in revenues and operations in the United States, Spain, Mexico, Brazil and Argentina. Within the Telefónica group, Mr. Carvajal served in different executive roles, including Chief Operating Officer. While with Telefónica, Mr. Carvajal used his vast expertise to manage all of the company's corporate departments, including operations, finance, sales, procurement, strategic planning, human resources and legal. Further, he used his diverse knowledge to support Telefónica's other lines of business, including developing a new method to generate over \$1 billion in revenues for Telefónica Data and developing as well as managing Telefónica's Internet B2B organization which provided e-business professional services to corporate clients. During his tenure with Telefónica, Mr. Carvajal successfully helped the company increase its profit in various areas of its business.

Before shifting his career to the telecommunications industry, Mr. Carvajal provided top-tier strategic development and value-based management consulting services to Fortune 100 corporations. In this role, Mr. Carvajal used his knowledge, skills and a detailed, fact-based methodology to help corporations maximize their full potential and shareholders' value. His clients included Bank of America, First Union Bank, Bank of Montreal and Champion International.

Mr. Carvajal earned a Bachelor in Science degree in Management from the United States Coast Guard Academy and a Master in Business Administration from Harvard University Graduate School of Business Administration.





## **RONALD RECHTMAN**

*Chief Technology Officer*  
**Q Link Wireless LLC**

*Principal Consultant*  
**NuRoN Consulting, Inc.**

**Ronald Rechtman** is an experienced technology professional residing in the Pembroke Pines, Florida area. Mr. Rechtman has extensive experience in the areas of technology systems, software development and programming. Mr. Rechtman is considered a “technology lifer” and has garnered much respect in the technology industry.

Mr. Rechtman currently serves as the Chief Technology Officer for Q Link Wireless, LLC, a telecommunications company based in Dania Beach, Florida. In this role, he oversees the technical aspects of the company’s business and helps implement and discover new technologies that yield successful results. Mr. Rechtman is crucial to Q Link Wireless’ operations and assists with making technology decisions that are instrumental to its success.

Throughout his career, Mr. Rechtman has focused on managing and supporting the technology needs of businesses. He has served as a technical team leader for software developers, a consultant to technology directors and Chief Technology Officers, as well as IT Director and Chief Technology Officer for multiple companies. In addition, Mr. Rechtman’s experience crosses various industries such as telecommunications and government programs.

Mr. Rechtman’s technical skillset is extensive. He has designed and implemented enterprise solutions for high transactional systems using technologies such as COM/COM+, SOAP/Web Services, ATL/WTL/WCF/ MS SQL/SSRS. He has also worked on multiple secured web application solutions using technologies like XML/XSLT, CSS, DHTML, SSL, AJAX and jQuery. Further, Mr. Rechtman’s programming language knowledge, which he has been developing since an early age, is vast and includes both well-known and obscure systems and products. These include without limitation Visual C/C++, ASP/ASP.NET, C#, VB.NET, and SQL. Mr. Rechtman’s technical skillset also includes database design utilizing systems such as Microsoft SQL Server, Pervasive, Oracle Mobile, MySql and FoxPro.

Mr. Rechtman also has knowledge and experience selecting and implementing technology solutions to streamline an organization’s operations and optimize their benefits. Along these lines, he has developed and implemented solutions for different system requirements such as wireless solutions, VoIP and Long Distance, database design and optimization, pocket PC applications, smart client applications and various websites.

Mr. Rechtman earned a Bachelor in Science degree in Computer Engineering from the University of South Florida.



## **ROI SADEH**

*Senior Software Engineer*  
**Q Link Wireless LLC**

*Former Chief Technology Officer*  
**012 Global Inc.**

**Roi Sadeh** is an experienced software engineer and technology leader residing in the Parkland, Florida area. Mr. Sadeh has extensive experience in the areas of technology strategy, software and web development, network engineering and infrastructure design, deployment and support. Mr. Sadeh has a reputation for developing creative solutions for various challenges, performing his tasks in an efficient manner, and being a positive team member to work with.

Mr. Sadeh currently serves as the Senior Software Engineer for Q Link Wireless, LLC, a telecommunications company based in Dania Beach, Florida. In this role, he helps to refine and execute technology strategies and roadmaps to direct data capabilities using third party OCS systems and integration with Sprint and T-Mobile. Mr. Sadeh, a business-savvy technology leader, consistently combines his strong technical acumen, polished management skills and deep business understanding to deliver valuable work product. It is this attribute that makes Mr. Sadeh an invaluable member of Q Link Wireless.

Mr. Sadeh's entire career has been focused on providing technology support to various businesses. Mr. Sadeh has served as a program instructor for the Cisco Systems Networking Academy, the Chief Architect and Developer for a VoIP service provider, and Chief Technology Officer for a telecommunications provider. In his various roles, Mr. Sadeh has garnered experience building technology infrastructure and systems, developing and managing R&D and engineering teams, and delivering advanced VoIP, back-end, web and mobile systems.

Mr. Sadeh also has a robust technical skillset. He has extensive experience utilizing various technologies including, but not limited to, VoIP, SIP, Multithreading, RTP, GSM, and Cisco. Mr. Sadeh's knowledge of programming languages includes C#, C, C++, T-SQL, PL-SQL, ASP.NET, JavaScript, PHP, VB6, Java, and Python. Further, Mr. Sadeh's technical skillset also includes databases, such as MS-SQL, MySQL, Oracle, NoSQL, MongoDB, SSIS, Reporting Services, and ETL.

Mr. Sadeh earned a Bachelor in Arts degree in Computer Science and a Master in Business Administration in Business and Information Technology from Netanya Academic Collage in Israel.



## **MAYBELL KELLY**

*Compliance Director*  
**Q Link Wireless LLC**

*Former Fraud & Compliance Manager*  
**Xchange Communications**

**Maybell Kelly** is an experienced compliance officer residing in the Miami, Florida area. Ms. Kelly has extensive experience in creating and managing operational, financial and regulatory procedures. In addition, Ms. Kelly has a managerial skillset that has made her a vital asset in the compliance industry. She is proactive and highly organized with an ability to handle multiple, complex tasks. Further, her verbal and written communication skills are unmatched.

Ms. Kelly currently serves as the Compliance Director for Q Link Wireless, LLC, a telecommunications company based in Dania Beach, Florida. In this role, Ms. Kelly manages, evaluates and implements requirements of the Federal Communications Commission's Lifeline Program and conducts internal and external audits to maintain adherence to applicable standards. She also works directly with administrators of the Lifeline Program to identify compliance requirement updates necessary to ensure the integrity of the Lifeline Program. Ms. Kelly is an important resource for Q Link Wireless as she is responsible for maintaining positive relationships with the Federal Communications Commission, Universal Service Administrative Co., and other local government offices. These relationships have been crucial to the success of Q Link Wireless.

Ms. Kelly's compliance experience has been primarily in the telecommunications industry. Prior to joining Q Link Wireless, she was a Fraud & Compliance Manager for Xchange Communications, a telecommunications powerhouse in Miami, Florida. During this time, she managed the company's fraud operations by conducting reviews of the fraud manual, performed risk management analysis of merchant accounts, and monitoring dispute patterns.

Before shifting her career to compliance, Ms. Kelly served as an administrative assistant for a building materials company. In this role, she performed a variety of tasks including preparing monthly and quarterly commissions report for the VP of Operations and managing communication with vendors in Latin America and Spain. Ms. Kelly also served as an Account Collection and Receivables Manager for a provider of wholesale and retail telecommunications services. In this capacity, she developed strategies to increase the percentage of successful client payments and gathered and analyzed credit and financial information on new and existing clients. These experiences gave Ms. Kelly the necessary skills to successfully transition to a career in compliance.

**EXHIBIT 7**

**Proposed Lifeline Offering**

## Q LINK WIRELESS LLC LIFELINE OFFERING

### Non-Tribal:

#### **Lifeline Bundle Plan (Q LINK ALWAYS ON)**

1,000 anytime minutes per month  
Unlimited text and picture messaging  
4.5 GB data per month  
Minutes & data do not rollover  
Net cost to Lifeline customer: \$0

### Tribal:

#### **Tribal Lifeline Plan**

Unlimited minutes  
Unlimited text and picture messaging  
Unlimited data  
(No hotspot)  
Net cost to Tribal Lifeline customer: \$0

All packages include:

- Free SIM card, or discounted data-capable device for qualified applicants
- Free calls to Q LINK Customer Service
- Free calls to 911 emergency services
- Free access to Voicemail, Caller-ID, and Call Waiting features
- Voice minutes may be used for Domestic Long Distance at no extra charge

#### **Additional airtime available for purchase**

Current rates published at <https://qlinkwireless.com/members/cart/quickpurchase.aspx>

## EXHIBIT 8

### Service Quality and Consumer Protection

The Company is committed to satisfying all applicable state and federal requirements related to consumer protection and service quality standards.

The Company complies with the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless Service.

1. Disclose Rates and Terms of Service – These are fully disclosed in advertising as well as on the Company's website.
2. Make Coverage Maps Available – Coverage maps are available on the Company's website.
3. Provide contract terms – the Company does not employ contracts.
4. Allow a trial service – Since Lifeline customers receive free service, there is no contract with company to the service on their part. If the service does not suit their needs, they can cancel service.
5. Provide Specific Disclosure in advertising – All Company advertising, including its website, fully discloses charges and service parameters.
6. Separately Identify Carrier Charges from Tax on Billing Statements – the Company does not render billing statements to its prepaid customers, but for every transaction they make, service charges vs. taxes are fully described.
7. Provide Customers with the Right to Terminate Service Upon Changes to Their Contract – As mentioned, we don't employ contracts so this provision does not apply.
8. Provide Ready Access to Customer Service – Customers can call customer service for free by dialing 611 or a toll free number. These numbers are disclosed on the Company's website and in advertising and customer welcome materials. Customers may also access Customer Service online through the Company's website.
9. Promptly Respond to Customer Inquiries and Complaints from Government Agencies – We promptly respond to all complaints. If a customer care representative cannot help a customer, we have an escalation process. The Company is committed to resolving customer questions, concerns and complaints in a swift and satisfactory manner.
10. Privacy Policy – The Company protects the privacy of customer information in accordance with applicable federal and state laws. Our privacy policy is available, via link, on every page of the Company's website.
11. Provide Consumers with Free Notifications for Voice, Data and Messaging Usage, and International Roaming – Because the Company's service is prepaid, customers are not able to incur overage charges. However, the Company provides, at no charge, (a) a notification to consumers of domestic wireless plans that include limited data allowances when consumers approach their allowance for data usage; (b) a notification to consumers of domestic voice and messaging plans that include limited voice and messaging allowances when consumers approach their allowance for those services; and (c) a notification to consumers without an international roaming plan/package whose devices have registered abroad and who may incur charges for international usage. The Company also clearly and conspicuously discloses tools or services that enable consumers to track, monitor and/or set limits on voice, messaging and data usage.

12. Abide by the following principles regarding the ability of customers, former customers, and individual owners of eligible devices to unlock phones and tablets, (“mobile wireless devices”) that are locked by or at the direction of the carrier –

- (1) Disclosure. The Company has posted on its website its clear, concise, and readily accessible policy on postpaid and/or prepaid mobile wireless device unlocking.
- (2) Postpaid Unlocking Policy. Not Applicable.
- (3) Prepaid Unlocking Policy. Upon request, the Company will unlock prepaid mobile wireless devices no later than one year after initial activation, consistent with reasonable time, payment or usage requirements.
- (4) Notice. The Company will clearly notify customers that their devices are eligible for unlocking at the time when their devices are eligible for unlocking or automatically unlock devices remotely when devices are eligible for unlocking, without additional fee. The Company reserves the right to charge non-customers/nonformer-customers with a reasonable fee for unlocking requests. Notice to prepaid customers may occur at point of sale, at the time of eligibility, or through a clear and concise statement of policy on the Company’s website.
- (5) Response Time. Within ten business days after receiving a request, the Company will unlock eligible mobile wireless devices or initiate a request to the OEM to unlock the eligible device, or provide an explanation of why the device does not qualify for unlocking, or why the carrier reasonably needs additional time to process the request.
- (6) Deployed Personnel Unlocking Policy. The Company will unlock mobile wireless devices for deployed military personnel who are customers in good standing upon provision of deployment papers.

The Company reserves the right to decline an unlock request if it has a reasonable basis to believe the request is fraudulent or the device is stolen.