

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Petition of Q LINK WIRELESS)
LLC)
)
) Docket No. _____
for Designation as an Eligible Telecommunications)
Carrier in the State of Utah)
_____)

**Q LINK WIRELESS LLC'S SUBMISSION OF
DIRECT TESTIMONY AND EXHIBITS**

Q LINK WIRELESS LLC, by counsel, files its Direct Testimony and Attachments with the Public Service Commission of Utah in the above-referenced docket. Q LINK's Direct Testimony and Attachments include the testimony of Issa Asad and Attachments 1-2, inclusive, identified therein.

Respectfully submitted this 24th day of January, 2012.

/s/
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Attorney for Q LINK WIRELESS LLC

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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DIRECT TESTIMONY OF ISSA ASAD

1 **Q1: WHAT IS YOUR NAME AND OCCUPATION?**

2 **A:** My name is Issa Asad. I am the Managing Member of QUADRANT HOLDINGS
3 GROUP LLC, which is the entity Managing Member of Q LINK WIRELESS
4 LLC (hereinafter sometimes referred to as “Q LINK” or the “Company”). Prior to
5 my involvement with Q LINK, I led some of the nation’s premier
6 telecommunications providers in the United States, representing VoIP, wireless
7 and prepaid service providers, manufacturers and suppliers in the new world of
8 Internet-based and wireless communications and entertainment. I have over 15
9 years of telecommunications expertise.

10 **Q2: WHAT IS Q LINK WIRELESS LLC?**

11 **A:** Q LINK is a Delaware Limited Liability Company organized on August 25, 2011.
12 The Company’s principal office is located at 499 Sheridan Street, Suite 300,
13 Dania, Florida 33004. Q LINK is a provider of commercial mobile radio service
14 (“CMRS”) throughout the United States and provides prepaid wireless
15 telecommunications services by using the Sprint Nextel (“Sprint”) network.

1 **Q3: WHAT TYPES OF SERVICES DOES THE COMPANY PROVIDE?**

2 **A:** The Company provides prepaid wireless services. In addition to voice services, Q
3 LINK offers text and multimedia messaging. Q LINK's prepaid wireless services
4 are affordable, easy to use, and attractive to lower-income and lower-volume
5 consumers, providing them with access to emergency services and a reliable
6 means of communication that can be used both at home and while traveling to
7 remain in touch with friends and family and for contacting prospective employers.

8 **Q4: HOW ARE Q LINK'S WIRELESS SERVICES DIFFERENT FROM**
9 **OTHER CARRIERS' OFFERINGS?**

10 **A:** Unlike many carriers, Q LINK does not impose burdensome credit checks, long-
11 term service contracts, activation fees or roaming charges. Q LINK customers are
12 from lower-income backgrounds and will not previously have had access to high
13 quality wireless services because of financial constraints or poor credit history.
14 Also unlike many carriers, Q LINK does not charge for balance inquiries, calls to
15 911 emergency services or calls to Q LINK customer service. Q LINK customers
16 enjoy the benefit of unused minutes carrying over from one month to the next. Q
17 LINK will offer Lifeline customers a certain amount of service free of charge. Q
18 LINK customers can use their minutes to place calls nationwide because Q LINK
19 does not constrict customers' use by imposing a local calling area requirement. In
20 addition to free voice services, Q LINK will provide Lifeline customers with
21 access to a variety of other features at no additional cost, including voice mail,
22 caller I.D., call waiting, and 3-way calling.

23

1 **Q5: DOES Q LINK CURRENTLY PROVIDE TELECOMMUNICATIONS**
2 **SERVICE IN UTAH?**

3 **A:** No; however Q LINK was acknowledged as a CMRS provider in the State of Utah
4 on January 9, 2012. Through its agreement with its underlying carrier, Sprint, Q
5 LINK is able to offer services wherever Sprint offers services in Utah.

6 **Q6: WILL Q LINK CONTRIBUTE TO THE UTAH ENHANCED 911 FUND?**

7 **A:** Yes. Q LINK will remit E-911 fees in Utah.

8 **Q7: WILL Q LINK CONTRIBUTE TO THE FUNDING FOR UNIVERSAL**
9 **SERVICE?**

10 **A:** Yes. Q LINK will contribute to the funding of both the federal and state universal
11 service funds (“USF”).

12 **Q8: WHAT IS THE NATURE OF Q LINK’S ETC DESIGNATION REQUEST?**

13 **A:** Q LINK requests Eligible Telecommunications Carrier (“ETC”) designation in
14 Utah solely to provide Lifeline and Link-Up service to qualifying Utah
15 consumers; it will not seek access to funds from the federal USF high cost
16 program.

17 **Q9: IN WHAT SERVICE AREAS IS Q LINK SEEKING DESIGNATION AS**
18 **AN ETC?**

19 **A:** Q LINK requests ETC designation in the wire centers in which Q LINK has
20 network coverage. These wire centers were included as Exhibit 6 of the
21 Company’s Petition.

22

23

1 **Q10: DOES Q LINK SATISFY THE REQUIREMENTS FOR ETC**
2 **DESIGNATION IN UTAH?**

3 **A:** Yes. Q LINK satisfies all of the requirements for ETC designation contained in
4 both federal and Utah state regulations. Q LINK recognizes that Section
5 214(e)(1)(A) of the Communications Act of 1934, as amended (the “Act”), states
6 that ETCs shall offer services, at least in part, over their own facilities and that the
7 Federal Communications Commission’s (FCC) Rules (47 C.F.R. § 54.201(i))
8 prohibit state commissions from designating as an ETC a telecommunications
9 carrier that offers services exclusively through the resale of another carrier’s
10 services. Q LINK offers services through a combination of its own facilities and
11 resale.

12 **Q11: HAS Q LINK BEEN DESIGNATED AS AN ETC IN ANY OTHER**
13 **STATES?**

14 **A:** Yes. Q LINK has been designated as an ETC in Maryland on December 21, 2011.
15 Q LINK currently has applications for ETC designation pending in the following
16 states: Arizona, Arkansas, Colorado, Georgia, Kansas, Kentucky, Massachusetts,
17 Michigan, Minnesota, Mississippi, Missouri, New Jersey, Pennsylvania, South
18 Carolina, Texas, West Virginia, and Wisconsin. Q LINK has not been denied ETC
19 status by any regulatory authority.

20 **Q12: WHAT FUNCTIONS WILL Q LINK OFFER TO SUBSCRIBERS ONCE**
21 **GRANTED ETC STATUS?**

22 **A:** Q LINK offers, or will offer upon designation as an ETC in Utah, all of the
23 services and functionalities required by the FCC’s rules:

1 a. *Voice-grade access to the public switched network.* The FCC has
2 concluded that voice grade service means the ability to make and receive
3 phone calls, within a specified bandwidth and frequency range. Q LINK
4 meets this requirement by providing voice-grade access to the public
5 switched telephone network. Through its interconnection agreements, all
6 customers of Q LINK are able to make and receive calls on the public
7 switched telephone network within the specified bandwidth.

8 b. *Minutes of Use for Local Service.* ETCs must provide minutes of
9 use for local service provided at no additional charge to end users. Q
10 LINK includes specified quantities of usage in its rate plans and thereby
11 complies with the requirement. It is important to note that currently, the
12 FCC has not adopted any minimum local service requirements. FCC
13 rules further require an ETC applicant to show it has a local usage plan
14 comparable, although not identical, to that offered by the ILEC in the
15 same service area.

16 c. *Access to emergency services.* ETCs must provide access to the
17 emergency services provided by local government or other public safety
18 organizations, such as 911 and enhanced 911 (E911), to the extent the
19 local government in an eligible carrier's service area has implemented
20 911 or E911 systems. Q LINK currently provides 911 and E911 access
21 for all of its customers, and will continue to comply with all FCC E911
22 requirements applicable to wireless resellers. Furthermore, through its

1 underlying carrier(s), Q LINK has the ability to remain functional in
2 emergency situations.

3 d. *Toll limitation for qualifying low-income consumers.* Toll
4 limitation allows customers to block the completion of outgoing long
5 distance calls to prevent them from incurring significant long distance
6 charges and risking disconnection. The nature of Q LINK's service
7 mitigates the need for toll control. Q LINK's service is not offered on a
8 distance-sensitive basis and minutes are not charged separately for local
9 or domestic long distance services. Since Q LINK's service is a prepaid
10 service, no customers will be disconnected for failure to pay toll charges.

11 **Q13: HOW QUICKLY CAN Q LINK COMMENCE SERVICE?**

12 **A:** Upon designation as an ETC, Q LINK will be able to provide Lifeline service to
13 qualified customers within a reasonable period of time. Q LINK's provider's
14 network is operational and largely built out. Thus, Q LINK will be able to
15 commence offering its service to all locations served by its underlying carrier very
16 soon after receiving approval from the Commission.

17 **Q14: HOW RELIABLE IS Q LINK'S QUALITY OF SERVICE?**

18 **A:** Q LINK's service is of the same quality and reliability as that of its underlying
19 carrier. To demonstrate its commitment to high service quality, Q LINK commits
20 to comply with the Cellular Telecommunications and Internet Association's
21 (CTIA) Consumer Code for Wireless Service. A copy of the CTIA Code is
22 attached as Attachment 1.

23

1 **Q15: HOW DOES Q LINK INTEND TO ADVERTISE THE AVAILABILITY OF**
2 **THE SUPPORTED SERVICES?**

3 **A:** Q LINK will broadly advertise the availability and rates for the services described
4 above using media of general distribution as required by Section 54.201(d)(2) of
5 the FCC's regulations. The Company will advertise its services in a manner
6 reasonably designed to reach those likely to qualify for Lifeline and Link-up
7 services, using many mediums for outreach including internet, radio, television
8 and local kiosks. The Company will engage in advertising campaigns promoting
9 the availability of cost-effective wireless services to this neglected consumer
10 segment. Q LINK will provide retail vendors with signage to be displayed
11 wherever Q LINK products are sold, and with printed materials describing the
12 Company's Lifeline and Link-Up programs. Q LINK will promote the availability
13 of its Lifeline and Link-up offerings by distributing brochures at various state and
14 local social service agencies, and intends to partner with nonprofit assistance
15 organizations in order to inform customers of the availability of its Lifeline and
16 Link-Up services.

17 **Q16: WILL Q LINK COMPLY WITH THE LIFELINE CERTIFICATION AND**
18 **VERIFICATION REQUIREMENTS?**

19 **A:** Yes. Q LINK will comply with the FCCs certification and verification
20 requirements, and with Commission determined methods or processes to establish
21 initial eligibility, to complete annual recertification and to determine that
22 customers do not take service from multiple lifeline providers.

23

1 **Q17: HOW WILL Q LINK CERTIFY THAT A CUSTOMER IS ELIGIBLE FOR**
2 **THE FEDERAL LIFELINE DISCOUNT?**

3 **A:** During the enrollment process, applicants will be directed to a toll-free telephone
4 number and to Q LINK's website, which will contain information regarding the
5 Company's Lifeline and Link-Up services, including a detailed description of the
6 programs and state-specific eligibility criteria. Customers may then request that an
7 enrollment form be mailed to them, or they can download a form from the
8 internet. Applicants must complete the enrollment form, which will include a
9 place where applicants must attest and certify under penalty of perjury that they
10 satisfy the requisite eligibility criteria. In addition, each applicant is required to
11 certify under penalty of perjury, at the time of application and annually thereafter,
12 that they are head of their household and receive Lifeline-supported service only
13 from Q LINK. If not applying in person, the applicant must return the signed
14 enrollment form and all supporting documentation to the address provided by Q
15 LINK. Processing of consumers' applications, including review of all application
16 forms and relevant documentation, will be performed under the Company's
17 supervision by managers experienced in the administration of the Lifeline and Link-
18 Up programs. Q LINK maintains records of its compliance with federal
19 certification rules in accordance with the FCC's rules regarding record retention.

20 **Q18: HOW WILL Q LINK VERIFY A CUSTOMER'S CONTINUED**
21 **ELIGIBILITY FOR THE FEDERAL LIFELINE DISCOUNT?**

22 **A:** Customers must self-certify, under penalty of perjury, at the time of service
23 activation and annually thereafter, that they remain head of household and receive

1 Lifeline-supported service only from Q LINK. Furthermore, customers chosen to
2 participate in the additional random survey of continued eligibility will be
3 required to attest and certify under penalty of perjury that they continue to satisfy
4 the requisite program or income based eligibility criteria. Q LINK will require
5 and obtain all such certifications as a condition for continued Lifeline support, and
6 will maintain certification records for auditing purposes.

7 **Q19: DOES Q LINK USE A THIRD PARTY ADMINISTRATOR TO ASSIST**
8 **WITH ITS LIFELINE SERVICES?**

9 **A:** Yes. Q LINK has contracted with CGM, LLC of Roswell, Georgia, a lifeline
10 service bureau, to edit all subsidy request data. CGM will process and validate
11 the Company's subsidy data to prevent: (1) Duplicate Same-Month Lifeline
12 Subsidies (Double Dip): any name/address that is already receiving a lifeline
13 subsidy from the Company will be automatically prevented from receiving a
14 second lifeline subsidy in that same month; and (2) Inactive lines receiving
15 subsidy: CGM's systems compare all subsidy requests to underlying network
16 status to ensure that subsidies are requested only for active lines. Through the
17 process described above, Q LINK ensures that it does not over-request from
18 support funds.

19 **Q20: WHAT MEASURES DOES Q LINK PLAN TO TAKE TO PREVENT**
20 **RECOVERY OF THE FEDERAL LIFELINE DISCOUNT FOR**
21 **CUSTOMERS ALREADY RECEIVING THE DISCOUNT FOR THEIR**
22 **LANDLINE TELEPHONE?**

23 **A:** Q LINK application forms will require each applicant to provide their name,

1 primary residential address and an alternate telephone number (if any). Q LINK
2 will incorporate this information into its customer information database. As
3 previously mentioned, the Company will check the name and address of each
4 Lifeline applicant against its database to determine whether or not it is associated
5 with a customer that already receives Q LINK Lifeline service, and will then review
6 the application to ascertain whether the applicant is attempting to receive Lifeline-
7 supported service for more than one handset associated with the address. Q LINK
8 will deny the Lifeline application of any such individual and advise the applicant of
9 the basis for the denial. As mentioned above, applicants must self-certify, under
10 penalty of perjury, at the time of service activation and annually thereafter, that
11 they remain head of household and receive Lifeline-supported service only from
12 Q LINK. In addition, Q LINK will utilize the Department of Community and
13 Culture's knowledge and databases (or the provider of verification services
14 established through Docket No. 10-2508-01) to ensure as accurately as possible
15 that only one individual per household is receiving the subsidy, and that
16 applicants are not already receiving Lifeline support from any other carrier.

17 **Q21: WHAT MEASURES DOES Q LINK PLAN TO TAKE TO PREVENT**
18 **RECOVERY OF LIFELINE FUNDS FOR PREPAID CUSTOMERS WHO**
19 **CEASE USING Q LINK PHONES AND AIRTIME?**

20 **A:** Q LINK will adhere to its non-usage policy. Q LINK recognizes the importance
21 of safeguarding the USF. Therefore, the Company has implemented the
22 following 60-day non-usage policy in an effort to avoid waste, fraud, and abuse of
23 the program. If no usage appears on a Q LINK Lifeline customer's account

1 during any continuous 60-day period, the Company will promptly notify the
2 customer that the customer is no longer eligible for Q LINK Lifeline service
3 subject to a 30-day grace period. During the 30-day grace period, the customer's
4 account will remain active, but Q LINK will engage in outreach efforts to
5 determine whether the customer desires to remain on the Company's Lifeline
6 service. If the customer's account does not show any customer-specific activity
7 during the grace period, Q LINK will promptly deactivate Lifeline services and
8 cease to seek reimbursement from the USF for that customer. Customers that
9 have been deactivated may participate in the Company's Lifeline service in the
10 future by reapplying and re-establishing eligibility.

11 **Q22: WHAT ARE THE RATES AND TERMS OF Q LINK'S LIFELINE**
12 **SERVICE OFFERING?**

13 **A:** Attached Exhibit 2 demonstrates that eligible customers can choose between three
14 (3) different plans of anytime prepaid minutes per month at no charge, with
15 additional airtime minutes available for purchase in bundles. The Company's
16 Lifeline service will provide customers with varying amounts of anytime prepaid
17 minutes per month at no charge. Lifeline customers will have the capability of
18 purchasing additional bundles of minutes in denominations as low as \$9.99,
19 \$19.99, \$29.99, and \$59.99.¹ Text messaging will be available at the rate of one-
20 third of one minute (3 texts = 1 minute) or one minute (1 text = 1 minute)
21 depending on the plan the customer chooses. In addition to free voice services, Q
22 LINK's Lifeline plan will include a free handset and the following Custom

¹ \$9.99 = 50 minutes, \$19.99 = 120 minutes, \$29.99 = 200 minutes, and \$59.99 = 450 minutes.

1 Calling features: Caller ID, Call Waiting, 3-Way Calling, and Voicemail.
2 Customers may use their minutes to place domestic long distance calls at no
3 additional charge. Calls to Q LINK customer service will be free, and unused
4 minutes will rollover². Calls to 911 emergency services are always free,
5 regardless of service activation or availability of minutes. Moreover, by
6 providing a wireless handset free of charge, Q LINK guarantees that eligible
7 customers can access the Company's Lifeline services without incurring any
8 upfront or recurring costs.

9 Consistent with FCC requirements, Q LINK will use Link-Up support to reduce
10 the Company's \$60.00 standard wireless activation charge by \$30.00. Qualifying
11 subscribers may request a deferred payment schedule for the remaining
12 installation charges, thus allowing subscribers to obtain service without being
13 required to pay any fees to activate service with Q LINK. As such, there is no up-
14 front connection charge applicable to Q LINK Lifeline and Link-Up customers.

15 **Q23: DOES Q LINK INTEND TO PROVIDE QUALIFIED LIFELINE**
16 **CUSTOMERS WITH A FREE HANDSET?**

17 **A:** Yes, Q LINK will provide qualified Lifeline customers with a free handset. Q
18 LINK's phones have been through extensive testing in Sprint's handset lab to
19 ensure proper network performance, 911 reliability, and to make sure the handset
20 does not cause network interference.

21
22

² Unused minutes rollover on Plans 1 and 2.

1 **Q24: HOW WILL CUSTOMERS KNOW IN ADVANCE THE NUMBER OF**
2 **FREE MINUTES THEY WILL HAVE AND WHEN MORE WILL BE**
3 **ADDED?**

4 **A:** Lifeline customers will have detailed materials in the box with their phone that
5 describe the number of minutes/credit they receive and when the minutes/credit
6 will be replenished. Q LINK customers can check the balance of their minutes
7 either online or by calling customer service.

8 **Q25: WHAT HAPPENS TO THE CUSTOMER'S PHONE SERVICE AFTER**
9 **THE FREE MINUTES HAVE BEEN UTILIZED?**

10 **A:** Once the minutes (plus any carry over minutes) have been utilized, customers will
11 either have to wait until the next month for a new allotment of minutes of free air
12 time or they can purchase additional minutes.

13 **Q26: HOW WILL CUSTOMERS COMMUNICATE WITH Q LINK**
14 **REGARDING QUESTIONS, CONCERNS OR COMPLAINTS?**

15 **A:** Q LINK's Lifeline customers will have access to Q LINK's customer care (the
16 same customer care as regular retail customers) by calling 611 from their Q LINK
17 Lifeline phone or the company's toll-free number. Customers can also contact
18 customer care on the Q LINK website. Q LINK is committed to resolving
19 customer questions, concerns and complaints in a swift and satisfactory manner.

20 **Q27: HOW WILL Q LINK'S PRESENCE AS AN ETC IN UTAH SERVE THE**
21 **PUBLIC INTEREST?**

22 **A:** A central purpose of the Telecommunications Act of 1996 was to "promote
23 competition and reduce regulation ... to secure lower prices and higher quality

1 services ... and encourage the rapid deployment of new telecommunications
2 technologies” to all citizens, regardless of geographic location or income.³

3 Designation of Q LINK as an ETC would undoubtedly further these goals. Q
4 LINK’s Lifeline service will provide low-income Utah residents with the
5 convenience and security offered by wireless services—even if their financial
6 position deteriorates.

7 Q LINK’s Lifeline plan will not only allow feature-rich mobile connectivity for
8 qualifying subscribers, but will also bring competition and more variety of
9 options into the reach of Lifeline customers. Q LINK’s plan is comparable in
10 minutes and features to those available to Utah post-paid wireless subscribers –
11 just at low Lifeline rates and without the burden of credit checks, contracts,
12 activation fees or roaming charges.

13 Without question, prepaid wireless services have become essential for lower-
14 income customers, providing them with value for their money, access to
15 emergency services on wireless devices, and a reliable means of contact for
16 prospective employers, social service agencies or dependents. Providing Q LINK
17 with the authority necessary to offer discounted Lifeline services to those most in
18 danger of losing wireless service altogether undoubtedly promotes the public
19 interest.

20 **Q28: WHAT ARE SOME OF THE BENEFITS OF INCREASED**
21 **COMPETITIVE CHOICE?**

22 **A:** Introducing Q LINK as an additional ETC provider into the market will afford

³ The Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, 56 (1996).

1 low income Utah residents a wider choice of providers and available services
2 while creating a competitive marketplace as ETCs compete for a finite number of
3 Lifeline-eligible customers. Increasing the competitive marketplace of providers
4 has the potential to effectively increase the penetration rate and reduce the number
5 of individuals not connected to the PSTN. As of December 31, 2009, only
6 between 20-50% of Lifeline-eligible consumers in Utah were being provided such
7 services.⁴ Q LINK believes that it is uniquely positioned to help increase
8 awareness of and participation in the Lifeline program.

9 **Q29: IF Q LINK'S PETITION IS GRANTED, WILL THERE BE ANY IMPACT**
10 **ON THE UNIVERSAL SERVICE FUND?**

11 **A:** Q LINK's request for designation as an ETC would not unduly burden the USF or
12 otherwise reduce the amount of funding available to other ETCs. Q LINK seeks
13 ETC designation solely to utilize USF funding to provide Lifeline and Link-Up
14 service to qualified low-income consumers. It does not seek and will not accept
15 high cost support. With Lifeline, ETCs only receive support for customers they
16 obtain. The amount of support available to an eligible subscriber is exactly the
17 same whether the support is given through a company such as Q LINK or the
18 Incumbent LEC operating in the same service area. Q LINK will only increase the
19 amount of USF Lifeline funding in situations where it obtains Lifeline customers
20 not enrolled in another ETC's Lifeline program. Significantly, Q LINK's
21 designation as an ETC will not increase the number of persons eligible for
22 Lifeline support. As stated in the Act, the universal service fund was established

⁴ see <http://www.usac.org/li/about/participation-rate-information.aspx#2009>

1 to ensure that quality services are available to all individuals at just, reasonable
2 and affordable rates. Q LINK's ability to increase the participation rate of
3 qualified low-income individuals will further the goal of Congress to provide all
4 individuals with affordable access to telecommunications service.

5 **Q30: DOES Q LINK AGREE TO COMPLY WITH ALL COMMISSION RULES**
6 **AND REGULATIONS REGARDING ETC?**

7 **A:** Yes. Q LINK hereby asserts its willingness and ability to comply with all the
8 rules and regulations that the Commission may lawfully impose upon the
9 Company's provision of service contemplated by its petition for ETC designation.

10 **Q31: IS THERE ANYTHING ELSE YOU WOULD LIKE TO ADD TO YOUR**
11 **TESTIMONY?**

12 **A:** I would like to reiterate that Q LINK meets all legal requirements for designation
13 as an ETC. Accordingly, the Commission should promptly grant Q LINK's
14 petition ETC designation so that Q LINK may commence providing service to
15 qualified low-income Utah households at the earliest possible time.

ATTACHMENT 1

CTIA Code

ATTACHMENT 2

Q LINK WIRELESS LLC's Lifeline and Link-Up Rates

Lifeline Rates

Plan 1: 68 Monthly Minutes Plan*

68 anytime minutes per month

(texts are one-third of one minute, i.e. 3 texts = 1 minute)

Net cost to Lifeline customer: **\$0 (free)**

*This package includes:

- Free handset
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free Voicemail, Caller-ID, and Call Waiting
- 68 anytime minutes (unused minutes rollover)
- Free Domestic Long Distance
- Free International Long Distance to countries designated at www.qlinkwireless.com (listed below)

Plan 2: 125 Monthly Minutes Plan*

125 anytime minutes per month

(texts are one minute, i.e. 1 text = 1 minute)

Net cost to Lifeline customer: **\$0 (free)**

*This package includes:

- Free handset
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free Voicemail, Caller-ID, and Call Waiting
- 125 anytime minutes (unused minutes rollover)
- Free Domestic Long Distance

Plan 3: 250 Monthly Minutes Plan*

250 anytime minutes per month

(texts are one minute, i.e. 1 text = 1 minute)

Net cost to Lifeline customer: **\$0 (free)**

*This package includes:

- Free handset
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free Voicemail, Caller-ID, and Call Waiting
- 250 anytime minutes (unused minutes *do not* rollover)
- Free Domestic Long Distance

International Long Distance

Free International Calling Destinations on the 68 Monthly Minutes Plan

(Certain special or off-network locations may be excluded from the Free International Long Distance. Calls to cellular phones are not included unless the word "Cellular" is specifically listed next to the country name. Numbers in parentheses () indicate the Country Code.)

Albania-Tirana (355)	French Guiana-Cellular (594)	Norway (47)
Andorra (376)	French Guiana (594)	Panama (507)
Argentina (54)	Georgia (995)	Paraguay (595)
Australia (61)	Germany (49)	Peru (51)
Austria (43)	Gibraltar (350)	Poland (48)
Bahamas-Cellular (1)	Greece (30)	Portugal (351)
Bahamas (1)	Guadeloupe (590)	Romania (40)
Bangladesh-Cellular (880)	Guatemala-Telgua (502)	Russia-Cellular (7)
Bangladesh-Chittagong (880)	Hong Kong-Cellular (852)	Russia (7)
Bangladesh-Dhaka (880)	Hong Kong (852)	San Marino-Cellular (378)
Bangladesh-Sylhet (880)	Hungary (36)	San Marino (378)
Belgium (32)	Iceland (354)	Saudi Arabia-Riyadh (966)
Bermuda-Cellular (1)	India-Cellular (91)	Singapore-Cellular (65)
Bermuda (1)	India (91)	Singapore (65)
Bolivia-La Paz (591)	Indonesia-Cellular (62)	Slovakia (421)
Bolivia-Santa Cruz (591)	Indonesia-Jakarta (62)	Slovenia (386)
Brazil (55)	Indonesia-Surabaya (62)	South Korea-Cellular (82)
Brunei-Cellular (673)	Iraq-Baghdad (964)	South Korea (82)
Brunei (673)	Ireland (353)	Spain (34)
Bulgaria (359)	Israel (972)	Sweden (46)
Canada-Cellular (1)	Italy (39)	Switzerland (41)
Canada (1)	Japan (81)	Taiwan-Cellular (886)
Chile (56)	Jordan (962)	Taiwan (866)
China-Cellular (86)	Kazakhstan (7)	Thailand (66)
China (86)	Kenya-Nairobi (254)	Turkey (90)
Columbia-Cellular (57)	Lithuania (370)	United Kingdom (44)
Columbia (57)	Luxembourg-Cellular (352)	Uzbekistan (7)
Costa Rica (506)	Luxembourg (352)	Venezuela (58)
Croatia (585)	Macao-Cellular (853)	Vietnam-Ho Chi Minh City (84)
Cyprus-Cellular (357)	Macao (853)	Zambia (260)
Cyprus (357)	Malaysia-Cellular (60)	
Czech Republic (420)	Malaysia (60)	
Denmark (45)	Malta (356)	
Dominican Republic (1)	Mexico (52)	
Estonia (372)	Monaco (377)	
Finland (358)	Netherlands (31)	
France (33)	New Zealand (64)	
French Antilles (594)		

Link-Up Service Rates

Standard Activation Rate: \$60.00

Link-Up Discount: \$30.00

Net cost to Link-Up Customer: **\$30.00***

*Qualifying subscribers may request a deferred payment schedule for the remaining installation charges, thus allowing subscribers to obtain service without being required to pay any fees to activate service with Q LINK.

State of _____

County of _____

AFFIDAVIT

I, Issa Asad, first being duly sworn upon oath depose and say that I am the Managing Member of QUADRANT HOLDINGS GROUP LLC, Managing Member of Q LINK WIRELESS LLC, the Petitioner, and that I have read the above and foregoing direct testimony by me subscribed and know the contents thereof, which testimony was filed in support of Q LINK WIRELESS LLC's Petition for Designation as an Eligible Telecommunications Carrier in the State of Utah; that said contents are true in substance and in fact, except as to matters stated upon information and belief, and as to those, I believe the same to be true.

Issa Asad
Managing Member of QUADRANT HOLDINGS GROUP LLC,
Managing Member of Q LINK WIRELESS LLC

Sworn to and subscribed before me

this ____ day of January, 2012.

Notary Public

My Commission Expires: