

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Petition of Q LINK WIRELESS
LLC

for Designation as an Eligible Telecommunications
Carrier in the State of Utah

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) Docket No. 12-2549-01
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**Q LINK WIRELESS LLC'S SUBMISSION OF
DIRECT TESTIMONY AND EXHIBITS**

Q LINK WIRELESS LLC, by counsel, files its Revised Direct Testimony and Attachments with the Public Service Commission of Utah in the above-referenced docket. Q LINK previously filed Direct Testimony and Attachments, including the CTIA Code and the Company's Lifeline and Link-Up Rates, on January 24, 2012 as Exhibit 7 to its Petition. Q LINK's Revised Direct Testimony and Attachments include the testimony of Issa Asad and Attachments 1-2, inclusive, identified therein.

Respectfully submitted this 13th day of September, 2012.

/s/
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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 East 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 using the Sprint Spectrum L.P. (“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 service to qualifying Utah consumers; it will not
15 seek access to funds from the federal USF high cost program.

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

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

21 **Q10: DOES Q LINK SATISFY THE REQUIREMENTS FOR ETC**
22 **DESIGNATION IN UTAH?**

23 **A:** Yes. Q LINK satisfies all of the requirements for ETC designation contained in

1 both federal and Utah state regulations. Q LINK recognizes that Section
2 214(e)(1)(A) of the Communications Act of 1934, as amended (the “Act”), states
3 that ETCs shall offer services, at least in part, over their own facilities and that the
4 Federal Communications Commission’s (FCC) Rules (47 C.F.R. § 54.201(i))
5 prohibit state commissions from designating as an ETC a telecommunications
6 carrier that offers services exclusively through the resale of another carrier’s
7 services, except where the FCC has granted forbearance from this requirement. Q
8 LINK offers services through a combination of its own facilities and resale.

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

11 **A:** Yes. Q LINK has been designated as an ETC in Colorado, Maryland, Michigan,
12 West Virginia, and Wisconsin. Q LINK currently has applications for ETC
13 designation pending in the following states: Arizona, Arkansas, California,
14 Georgia, Illinois, Kansas, Louisiana, Maine, Massachusetts, Minnesota, Mississippi,
15 Missouri, Ohio, Oklahoma, Nevada, Pennsylvania, South Carolina, Texas, and
16 Utah. Q LINK has not been denied ETC status by any regulatory authority.

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

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

- 21 a. *Voice-grade access to the public switched network.* The FCC has
22 concluded that voice grade service means the ability to make and receive
23 phone calls, within a specified bandwidth and frequency range. Q LINK

1 meets this requirement by providing voice grade access to the public
2 switched telephone network. Through its interconnection agreements, all
3 customers of Q LINK are able to make and receive calls on the public
4 switched telephone network within the specified bandwidth.

5 b. *Minutes of Use for Local Service.* ETCs must provide minutes of
6 use for local service provided at no additional charge to end users. Q
7 LINK includes specified quantities of usage in its rate plans and thereby
8 complies with the requirement. It is important to note that currently, the
9 FCC has not adopted any minimum local service requirements.

10 c. *Access to emergency services.* ETCs must provide access to the
11 emergency services provided by local government or other public safety
12 organizations, such as 911 and enhanced 911 (E911), to the extent the
13 local government in an eligible carrier's service area has implemented
14 911 or E911 systems. Q LINK currently provides 911 and E911 access
15 for all of its customers, and will continue to comply with all FCC E911
16 requirements applicable to wireless resellers. Furthermore, through its
17 underlying carrier(s), Q LINK has the ability to remain functional in
18 emergency situations.

19 d. *Toll limitation for qualifying low-income consumers.* The FCC has
20 stated that toll limitation would no longer be deemed a supported service.
21 Nonetheless, Q LINK's offerings inherently allow Lifeline customers to
22 control their usage, as its wireless service is offered on a prepaid basis.
23 Moreover, the nature of Q LINK's service mitigates the need for toll

1 control. Q LINK's service is not offered on a distance-sensitive basis and
2 minutes are not charged separately for local or domestic long distance
3 services.

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

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

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

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

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

18 **A:** Q LINK will broadly advertise the availability and rates for the services described
19 above using media of general distribution as required by Section 54.201(d)(2) of
20 the FCC's regulations. Q LINK will comply with requirements set forth in the
21 FCC's Lifeline and Link Up Reform Order, released February 6, 2012, as outlined
22 in the Company's FCC-Approved Compliance Plan which was filed with the
23 Commission on August 13, 2012. The Company will advertise its services in a

manner reasonably designed to reach those likely to qualify for Lifeline services, using many mediums for outreach including internet marketing, television and radio spots, print advertising, direct mailing, and local kiosks in retail outlets. The Company will engage in advertising campaigns promoting the availability of cost-effective wireless services to this neglected consumer segment. Q LINK will provide retail vendors with signage to be displayed wherever Q LINK products are sold, and with printed materials describing the Company's Lifeline program. Q LINK will promote the availability of its Lifeline offerings by distributing brochures at various state and local social service agencies, and intends to partner with nonprofit assistance organizations in order to inform customers of the availability of its Lifeline services.

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

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

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

A: During the enrollment process, applicants will be directed to a toll-free telephone number and to Q LINK's website, which will contain information regarding the Company's Lifeline services, including a detailed description of the programs and state-specific eligibility criteria. Customers may then request that an enrollment

1 form be mailed to them, or they can download a form from the internet.
2 Applicants must complete the enrollment form, which will include a place where
3 applicants must attest and certify under penalty of perjury that they satisfy the
4 requisite eligibility criteria. In addition, each applicant is required to certify under
5 penalty of perjury, at the time of application and annually thereafter, that they are
6 head of their household and receive Lifeline-supported service only from Q LINK.

7 If not applying in person, the applicant must return the signed enrollment form
8 and all supporting documentation to the address provided by Q LINK or via Q
9 LINK's kiosks. Processing of consumers' applications, including review of all
10 application forms and relevant documentation, will be performed under the
11 Company's supervision by managers experienced in the administration of the
12 Lifeline program. Q LINK maintains records of its compliance with federal
13 certification rules in accordance with the FCC's rules regarding record retention.

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

16 **A:** Customers must self-certify their eligibility, under penalty of perjury, at the time
17 of service activation and annually thereafter, and that they receive Lifeline-
18 supported service only from Q LINK. Furthermore, customers chosen to
19 participate in the additional random survey of continued eligibility will be
20 required to attest and certify under penalty of perjury that they continue to satisfy
21 the requisite program or income based eligibility criteria. Q LINK will require
22 and obtain all such certifications as a condition for continued Lifeline support, and
23 will maintain certification records for auditing purposes.

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

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

13 **Q20: WHAT MEASURES DOES Q LINK PLAN TO TAKE TO PREVENT**
14 **RECOVERY OF THE FEDERAL LIFELINE DISCOUNT FOR**
15 **CUSTOMERS ALREADY RECEIVING THE DISCOUNT FOR THEIR**
16 **LANDLINE TELEPHONE?**

17 **A:** Q LINK application forms will require each applicant to provide their name,
18 primary residential address and an alternate telephone number (if any). Q LINK
19 will incorporate this information into its customer information database. As
20 previously mentioned, the Company will check the name and address of each
21 Lifeline applicant against its database to determine whether or not it is associated
22 with a customer that already receives Q LINK Lifeline service, and will then review
23 the application to ascertain whether the applicant is attempting to receive Lifeline-

1 supported service for more than one handset associated with the address. Q LINK
2 will deny the Lifeline application of any such individual and advise the applicant of
3 the basis for the denial. As mentioned above, applicants must self-certify, under
4 penalty of perjury, at the time of service activation and annually thereafter, that
5 they receive Lifeline-supported service only from Q LINK. In addition, Q LINK
6 will utilize the Department of Community and Culture's knowledge and databases
7 (or the provider of verification services established through Docket No. 10-2508-
8 01) to ensure as accurately as possible that only one individual per household is
9 receiving the subsidy, and that applicants are not already receiving Lifeline
10 support from any other carrier.

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

14 **A:** Q LINK will adhere to its non-usage policy. Q LINK recognizes the importance
15 of safeguarding the USF. Therefore, the Company has implemented the
16 following 60-day non-usage policy in an effort to avoid waste, fraud, and abuse of
17 the program. If no usage appears on a Q LINK Lifeline customer's account
18 during any continuous 60-day period, the Company will promptly notify the
19 customer that the customer is no longer eligible for Q LINK Lifeline service
20 subject to a 30-day grace period. During the 30-day grace period, the customer's
21 account will remain active, but Q LINK will engage in outreach efforts to
22 determine whether the customer desires to remain on the Company's Lifeline
23 service. If the customer's account does not show any customer-specific activity

1 during the grace period, Q LINK will promptly deactivate Lifeline services and
2 cease to seek reimbursement from the USF for that customer. Customers that
3 have been deactivated may participate in the Company's Lifeline service in the
4 future by reapplying and re-establishing eligibility.

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

7 **A:** Attached Exhibit 2 demonstrates that eligible customers can choose between three
8 (3) different plans of anytime prepaid minutes per month at no charge, with
9 additional airtime minutes available for purchase in bundles. The Company's
10 Lifeline service will provide customers with varying amounts of anytime prepaid
11 minutes per month at no charge. Lifeline customers will have the capability of
12 purchasing additional bundles of minutes in denominations as low as \$9.99,
13 \$19.99, \$29.99, and \$59.99.¹ Text messaging will be available at the rate of one-
14 third of one minute (3 texts = 1 minute) or one minute (1 text = 1 minute)
15 depending on the plan the customer chooses. In addition to free voice services, Q
16 LINK's Lifeline plan will include a free handset and the following Custom
17 Calling features: Caller ID, Call Waiting, 3-Way Calling, and Voicemail.
18 Customers may use their minutes to place domestic long distance calls at no
19 additional charge. Calls to Q LINK customer service will be free, and unused
20 minutes will rollover.² Calls to 911 emergency services are always free,
21 regardless of service activation or availability of minutes. Moreover, by
22 providing a wireless handset free of charge, Q LINK guarantees that eligible

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

1 customers can access the Company's Lifeline services without incurring any
2 upfront or recurring costs.

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

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

9 **Q24: HOW WILL CUSTOMERS KNOW IN ADVANCE THE NUMBER OF**
10 **FREE MINUTES THEY WILL HAVE AND WHEN MORE WILL BE**
11 **ADDED?**

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

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

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

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

² Unused minutes rollover on Plans 1 and 2.

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

6 **Q27: HOW WILL Q LINK’S PRESENCE AS AN ETC IN UTAH SERVE THE**
7 **PUBLIC INTEREST?**

8 **A:** A central purpose of the Telecommunications Act of 1996 was to “promote
9 competition and reduce regulation ... to secure lower prices and higher quality
10 services ... and encourage the rapid deployment of new telecommunications
11 technologies” to all citizens, regardless of geographic location or income.³

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

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

22 Without question, prepaid wireless services have become essential for lower-

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

1 income customers, providing them with value for their money, access to
2 emergency services on wireless devices, and a reliable means of contact for
3 prospective employers, social service agencies or dependents. Providing Q LINK
4 with the authority necessary to offer discounted Lifeline services to those most in
5 danger of losing wireless service altogether undoubtedly promotes the public
6 interest.

7 **Q28: WHAT ARE SOME OF THE BENEFITS OF INCREASED**
8 **COMPETITIVE CHOICE?**

9 **A:** Introducing Q LINK as an additional ETC provider into the market will afford
10 low income Utah residents a wider choice of providers and available services
11 while creating a competitive marketplace as ETCs compete for a finite number of
12 Lifeline-eligible customers. Increasing the competitive marketplace of providers
13 has the potential to effectively increase the penetration rate and reduce the number
14 of individuals not connected to the PSTN. As of December 31, 2010, only
15 between 10-20% of Lifeline-eligible consumers in Utah were being provided such
16 services.⁴ Q LINK believes that it is uniquely positioned to help increase
17 awareness of and participation in the Lifeline program.

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

20 **A:** Q LINK's request for designation as an ETC would not unduly burden the USF or
21 otherwise reduce the amount of funding available to other ETCs. Q LINK seeks
22 ETC designation solely to utilize USF funding to provide Lifeline service to

⁴ see http://www.usac.org/_res/documents/li/pdf/participation-rates/li-participation-rate-map-2010.pdf

1 qualified low-income consumers. It does not seek and will not accept Link-Up or
2 high cost support. With Lifeline, ETCs only receive support for customers they
3 obtain. The amount of support available to an eligible subscriber is exactly the
4 same whether the support is given through a company such as Q LINK or the
5 Incumbent LEC operating in the same service area. Q LINK will only increase the
6 amount of USF Lifeline funding in situations where it obtains Lifeline customers
7 not enrolled in another ETC's Lifeline program. Significantly, Q LINK's
8 designation as an ETC will not increase the number of persons eligible for
9 Lifeline support. As stated in the Act, the universal service fund was established
10 to ensure that quality services are available to all individuals at just, reasonable
11 and affordable rates. Q LINK's ability to increase the participation rate of
12 qualified low-income individuals will further the goal of Congress to provide all
13 individuals with affordable access to telecommunications service.

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

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

19 **Q31: IS THERE ANYTHING ELSE YOU WOULD LIKE TO ADD TO YOUR**
20 **TESTIMONY?**

21 **A:** I would like to reiterate that Q LINK meets all legal requirements for designation
22 as an ETC. Q LINK's Compliance Plan was approved by the FCC on August 8,
23 2012. Accordingly, the Commission should promptly grant Q LINK's petition

- 1 ETC designation so that Q LINK may commence providing service to qualified
- 2 low-income Utah households at the earliest possible time.

ATTACHMENT 1

CTIA Code

CTIA

Consumer Code *for* Wireless Service

To provide consumers with information to help them make informed choices when selecting wireless service, the CTIA and the wireless carriers that are signatories below have developed the following Consumer Code. The carriers that are signatories to this Code have voluntarily adopted the principles, disclosures, and practices here for wireless service provided to individual consumers, including voice, messaging, and data services sold either on a postpaid or prepaid basis.

THE WIRELESS CARRIERS THAT ARE SIGNATORIES TO THIS CODE WILL:

ONE

DISCLOSE RATES AND TERMS OF SERVICE TO CONSUMERS

For each service plan offered to new consumers, wireless carriers will disclose to consumers at point of sale and on their web sites, at least the following information, as applicable: (a) the coverage area for the service; (b) any activation or initiation fee; (c) the monthly access fee or base charge; (d) the amount and nature of any voice, messaging, or data allowances included in the plan (such as night and weekend minutes); (e) the charges for domestic usage in excess of any included allowances or outside of the coverage area; (f) for prepaid service plans, the period of time during which any balance is available for use; (g) whether there are prohibitions on data service usage and whether there are network management practices that will have a material impact on the customer's wireless data experience; (h) whether any additional taxes, fees or surcharges apply; (i) the amount or range of any such fees or surcharges that are collected and retained by the carrier; (j) the amount or nature of any late payment fee; (k) whether a fixed-term contract is required and its duration; (l) the amount and nature of any early termination fee that may apply; and (m) the trial

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period during which a consumer may cancel service without any early termination fee, as long as the consumer complies with any applicable return policy.

TWO

MAKE AVAILABLE MAPS SHOWING WHERE SERVICE IS GENERALLY AVAILABLE

Wireless carriers will make available at point of sale and on their web sites maps depicting approximate domestic coverage applicable to each of their service plans currently offered to consumers. To enable consumers to make comparisons among carriers, these maps will be generated using generally accepted methodologies and standards to depict the carrier's outdoor coverage. All such maps will contain or link to an appropriate legend concerning limitations and/or variations in wireless coverage and map usage, including any geographic limitations on the availability of any services included in the plan. Wireless carriers will periodically update such maps as necessary to keep them reasonably current. If necessary to show the extent of service coverage available to customers from carriers' roaming partners, carriers will request and incorporate coverage maps from roaming partners that are generated using similar industry-accepted criteria, or if such information is not available, incorporate publicly available information regarding roaming partners' coverage areas.

THREE

PROVIDE CONTRACT TERMS TO CUSTOMERS AND CONFIRM CHANGES IN SERVICE

When a customer initiates new service or a change in existing service, the carrier will provide or confirm any new material terms and conditions of the ongoing service with the customer.

FOUR

ALLOW A TRIAL PERIOD FOR NEW SERVICE

When a customer initiates postpaid service with a wireless carrier, the customer will be informed of and given a period of not less than 14 days to try out the service. The carrier will not impose an early termination fee if the customer cancels service within this period, provided that the customer complies with applicable return and/or exchange policies. Other charges, including usage charges, may still apply.

FIVE

PROVIDE SPECIFIC DISCLOSURES IN ADVERTISING

In advertising of prices for wireless service plans or devices, wireless carriers will disclose material charges and conditions related to the advertised prices and services, including if applicable and to the extent the advertising medium reasonably allows: (a) whether activation or initiation fees apply; (b) monthly access fees or base charges; (c) the amount and nature of any voice, messaging, or data service allowances included in the plan; (d) the charges for any domestic usage in excess of any included allowances or outside of the coverage area; (e) for prepaid service plans, the period of time during which any balance is available for use; (f) whether there are network management practices that will have a material impact on the customer's wireless data experience; (g) whether any additional taxes, fees or surcharges apply; (h) the amount or range of any such fees or surcharges that are collected and retained by the carrier; (i) whether a fixed-term contract is required and its duration; (j) early termination fees; (k) the terms and conditions related to receiving a product or service for "free;" (l) for any service plan advertised as "nationwide," (or using similar terms), the carrier will have available substantiation for this claim; and (i) whether prices or benefits apply only for a limited time or promotional period and, if so, whether any different fees or charges will apply for the remainder of the contract term.

SIX

**SEPARATELY IDENTIFY CARRIER CHARGES FROM TAXES ON BILLING
STATEMENTS**

On customers' bills, carriers will distinguish (a) monthly charges for service and features, and other charges collected and retained by the carrier, from (b) taxes, fees and other charges collected by the carrier and remitted to federal state or local governments. Carriers will not label cost recovery fees or charges as taxes.

SEVEN

**PROVIDE CUSTOMERS THE RIGHT TO TERMINATE SERVICE FOR CHANGES TO
CONTRACT TERMS**

Carriers will not modify the material terms of their postpaid customers' contracts in a manner that is materially adverse to those customers without providing a reasonable

advance notice of a proposed modification and allowing those customers a time period of not less than 14 days to cancel their contracts with no early termination fee.

EIGHT

PROVIDE READY ACCESS TO CUSTOMER SERVICE

Customers will be provided a toll-free telephone number to access a carrier's customer service during normal business hours. Customer service contact information will be provided to customers online and on billing statements. Each wireless carrier will provide information about how customers can contact the carrier in writing, by toll-free telephone number, via the Internet or otherwise with any inquiries or complaints, and this information will be included, at a minimum, on all billing statements, in written responses to customer inquiries and on carriers' web sites. Each carrier will also make such contact information available, upon request, to any customer calling the carrier's customer service departments.

NINE

**PROMPTLY RESPOND TO CONSUMER INQUIRIES AND COMPLAINTS RECEIVED
FROM GOVERNMENT AGENCIES**

Wireless carriers will respond in writing to state or federal administrative agencies within 30 days of receiving written consumer complaints from any such agency.

TEN

ABIDE BY POLICIES FOR PROTECTION OF CUSTOMER PRIVACY

Each wireless carrier will abide by a policy regarding the privacy of customer information in accordance with applicable federal and state laws, and will make available to the public its privacy policy concerning information collected online. Each wireless carrier will abide by the CTIA Best Practices and Guidelines for Location-Based Services.

ELEVEN

**PROVIDE CONSUMERS WITH FREE NOTIFICATIONS FOR VOICE, DATA AND
MESSAGING USAGE, AND INTERNATIONAL ROAMING**

Each wireless provider will provide, at no charge: (a) a notification to consumers of currently-offered and future domestic wireless plans that include limited data allowances when consumers approach and exceed their allowance for data usage and will incur overage charges; (b) a notification to consumers of currently-offered and future domestic voice and messaging plans that include limited voice and messaging allowances when consumers approach and exceed their allowance for those services and will incur overage charges; 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. Wireless providers will generate the notifications described above to postpaid consumers based on information available at the time the notification is sent. Wireless consumers will not have to affirmatively sign up in order for these notifications to be sent. Each wireless provider shall provide its customers at least two of these alerts by October 17, 2012 and all of these alerts by April 17, 2013. Wireless providers will clearly and conspicuously disclose tools or services that enable consumers to track, monitor and/or set limits on voice, messaging and data usage.

ATTACHMENT 2

Q LINK WIRELESS LLC's Lifeline 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)		

State of Florida

County of Broward

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.



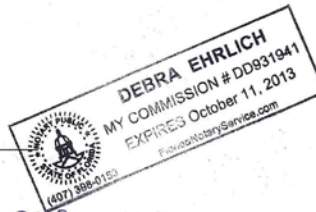
Issa Asad
Managing Member of QUADRANT HOLDINGS GROUP LLC,
Managing Member of Q LINK WIRELESS LLC

Sworn to and subscribed before me

this 13th day of September, 2012.



Notary Public



My Commission Expires: October 11, 2013