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February 14, 2020

VIA ELECTRONIC DELIVERY

Utah Public Service Commission
160 East 300 South, 4th Floor
Salt Lake City, UT 84111

Re: Q LINK WIRELESS LLC - Petition to Expand ETC Service Area

To Whom It May Concern:

Attached please find for filing the Petition of Q LINK WIRELESS LLC to expand its Eligible Telecommunications Carrier service area ("Petition").

I hereby certify that a true and correct copy of the above referenced Petition was filed upon the Commission via e-mail on February 14, 2020.

If you have any questions, or if I may provide you with any additional information, please do not hesitate to contact me at 770-232-9200 or hkirby@telecomcounsel.com.

Respectfully submitted,

s/ Heather Kirby

Heather Kirby
Regulatory Specialist
Lance J.M. Steinhart, P.C.

Attorneys for Q LINK WIRELESS LLC

Attachments

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

| | | |
|---|---|------------|
| Petition of Q LINK WIRELESS LLC |) | |
| to expand its Eligible Telecommunications |) | |
| Carrier service area |) | Docket No. |
| |) | |

**PETITION OF Q LINK WIRELESS LLC TO EXPAND ITS ELIGIBLE
TELECOMMUNICATIONS CARRIER SERVICE AREA IN UTAH**

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February 14, 2020

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”), sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”), and the rules and regulations of the Public Service Commission of Utah (“Commission”), hereby petitions the Commission to expand Q LINK’s Eligible Telecommunications Carrier (“ETC”) service area in the State of Utah (“Petition”). Q LINK seeks expansion of its ETC designated service area that is statewide in scope, to allow the Company to provide Lifeline service wherever its underlying facilities-based providers have wireless coverage.

On December 14, 2012, Q LINK was designated as a Lifeline-only ETC in Utah by Commission Order in Docket 12-2549-01.¹ As demonstrated by the facts stated herein, and as certified in Exhibit 1 attached hereto, Q LINK continues to meet all statutory and regulatory requirements for designation as an ETC, including those in recent Orders adopted by the FCC.² The Company does not seek access to funds from the federal Universal Service Fund (“USF”) for

¹ *In the Matter of the Petition of Q LINK WIRELESS LLC for Designation as an Eligible Telecommunications Carrier in the State of Utah* (“ETC Petition”), Order Approving Stipulation and Settlement Agreement, Docket No. 12-2549-01 (December 14, 2012) (“ETC Designation Order”).

² *See In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 11-42, 00-197, 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) (“*Lifeline Modernization Order*”); *See 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 Nos. 17-287, 11-42, 00-197, Fifth Report and Order, Memorandum Opinion and Order and Order on Reconsideration, FCC 19-111, (rel. Nov. 14, 2019) (“*Fifth Report and Order*”).

the purpose of providing service to high-cost areas. Prompt approval of Q LINK's request would advance the public interest by enabling the Company to expand the availability of Lifeline service to many more low-income consumers in Utah. Accordingly, Q LINK 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:

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II. DESIGNATED SERVICE AREA

In the ETC Designation Order, the Commission designated Q LINK as an ETC in the State of Utah throughout the service area of its underlying provider, as defined in Exhibit 6 to Q LINK's ETC Petition. Q LINK currently provides wireless Lifeline service to eligible Utah Lifeline customers utilizing the wireless networks of Sprint Spectrum L.P. ("Sprint") and/or T Mobile USA, Inc. ("T-Mobile"). Through its agreement with these underlying carriers, Q LINK provides its customers the same ability to remain functional in emergency situations as currently provided by Sprint and T-Mobile to their own customers, including 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.

On May 23, 2018, Q LINK filed a Petition with the Commission seeking to amend its ETC designation in the State to include participation in the Utah Universal Service Fund (“UUSF”) in Docket 18-2549-02 (the “UUSF Petition”). On October 25, 2018, the Commission issued an Order granting conditional approval of a Stipulation and Settlement Agreement in support of Q LINK’s participation in the UUSF and receipt of state support for Lifeline services, concluding it was in the public interest.³ A condition of the Settlement Agreement was that Q LINK would timely file notice with the Commission, the Utah Division of Public Utilities and the Utah Office of Consumer Services and seek approval if it intended to modify the area in which it offers Lifeline service in the State.⁴ Q LINK now files this Petition seeking approval to expand its ETC-designated service area to include additional areas, which encompass non-rural and rural service areas and include federally-recognized tribal lands, in which its underlying carriers have sufficient coverage. Q LINK’s proposed ETC service area is described in attached Exhibit 2, using a current zip code coverage list as well as an updated corresponding rate center list.⁵

³ *In the Matter of Petition to Amend Q LINK WIRELESS LLC Designation as an Eligible Telecommunications Carrier to Participate in the Utah Universal Service Fund*, Order Approving Stipulation and Settlement Agreement, Docket No. 18-2549-02 (issued October 25, 2018) (“UUSF Approval Order”).

⁴ *Id.* at 2.

⁵ For convenience, Exhibit 2 contains the rate centers originally approved and the new proposed rate centers which are labeled accordingly.

III. Q LINK MEETS APPLICABLE REQUIREMENTS

Sections 54.201-54.202 of the FCC's rules set forth the information that must be contained in an application for designation as an ETC (the "FCC ETC Rules"). In its ETC Petition, Q LINK provided the information required by FCC ETC Rules in effect at the time. In the Commission's ETC Designation Order, it found that Q LINK satisfied the requirements for designation as an ETC. Additionally, in its subsequent UUSF Petition, Q LINK further demonstrated that its service satisfied necessary requirements of the FCC's Lifeline rules adopted since it was initially granted ETC Designation. Q LINK incorporates the information in those filings by reference herein. Q LINK has complied with the conditions of its ETC designation and will continue to do so. In accordance with 47 C.F.R. § 54.202(a)(1)(i) and by the attached certification, Q LINK certifies that it will comply with the service requirements applicable to its receipt of federal Lifeline and UUSF support.

Q LINK is able 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 its requested service area in the State of Utah, including broadband Internet access service ("BIAS"). Q LINK's current Lifeline-supported service offering, appended as Exhibit 3, satisfies the minimum service standards set forth in 47 C.F.R. § 54.408. Q LINK also commits that its Lifeline-supported services will continue to meet or exceed the federal minimum service standards, including future changes.

IV. Q LINK'S PROVISION OF SERVICE TO ADDITIONAL UTAH RESIDENTS WOULD PROMOTE THE PUBLIC INTEREST

In the ETC Designation Order, the Commission found that designation of Q LINK as an ETC would serve the public interest. Expanding Q LINK's service area will further the public interest by allowing even more low-income Utah consumers to have access to low-priced and high-quality services. Q LINK's prepaid wireless plans enable eligible consumers to enjoy the benefits of wireless telecommunication without being subject to extensive credit reviews and long-term service commitments, which historically have prevented many low-income Americans, including many Utah residents, from reaping the full benefits of the intensely competitive wireless market.

Q LINK offers a unique, easy to use, competitive, and highly affordable wireless telecommunications service, which benefits qualified consumers who either have no other service alternatives or who choose a wireless prepaid solution in lieu of more traditional service. In today's market, 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 greater ability to be contacted by potential employers, and provides end users with the ability to contact emergency service providers regardless of location. 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 Lifeline offerings compare favorably with those of other competitive ETCs, and provide Lifeline customers with voice minutes, unlimited text messages, and a data allotment (with plan options meeting the voice and/or broadband minimum service standards), at no net cost to the customer after application of Lifeline and UUSF support. Expansion of Q LINK's ETC service

area will increase the number of low-income individuals that can benefit from the advantages offered by the Company's Lifeline service, ensuring they have access to wholly supported or discounted wireless voice and broadband service.

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 recently endorsed by the FCC which adopted an order to prevent Lifeline ETCs from paying commissions to agents.⁶ 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. Notably, Q LINK has successfully passed fifty-four (54) routine government audits led by the Universal Service Administrative Company (USAC) or state audits with no instances of duplicates in those audits. Q LINK's automated model, and its patent-pending kiosks once deployed, allow Q LINK to make wireless Lifeline available in less dense areas that have not been a focus of other Lifeline providers. Q LINK's business model is unique in that the Company is able to reach unserved and underserved Lifeline-eligible consumers; in fact, on average, eighty percent (80%) of Q LINK's customers are *new* and have not previously

⁶ See *Fifth Report and Order*, ¶168.

participated in the Lifeline program. Q LINK has best-in-class customer service, satisfaction, and retention, with one of the lowest churn (customer turnover) rates in the industry.

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. Without question, prepaid wireless services have become essential for low-income customers, providing them with value for their money, access to emergency services on wireless devices, and a reliable means of contact for prospective employers, social service agencies or dependents. Providing Q LINK with the authority necessary to offer discounted Lifeline services to eligible residents in additional areas of Utah where its underlying carriers have sufficient coverage undoubtedly promotes the public interest.

V. CONCLUSION

Q LINK respectfully requests that the Commission promptly approve the instant Petition and expand Q LINK's ETC service area to be statewide in scope, subject to the wireless coverage of the Company's underlying facilities-based providers.

Respectfully submitted,

s/ Lance J.M. Steinhart

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Attorneys for Q LINK WIRELESS LLC

February 14, 2020

EXHIBIT 1

Certification

CERTIFICATION

I, Issa Asad, hereby depose and state that I am the Chief Executive Officer (“CEO”) of Q LINK WIRELESS LLC (“Q LINK”); that I have read the Petition of Q LINK to expand its Eligible Telecommunications Carrier Service Area and know the contents thereof; and that the contents are true and correct to the best of my knowledge and belief. I further certify that Q LINK will comply with the service requirements applicable to the low-income universal service support that it receives.

Q LINK WIRELESS LLC

By: 

Issa Asad, CEO

EXHIBIT 2

Proposed Service Area

ZIP CODES IN Q LINK'S COVERAGE AREA

| | | | | | | |
|-------|-------|-------|-------|-------|-------|-------|
| 84001 | 84055 | 84106 | 84189 | 84404 | 84643 | 84754 |
| 84003 | 84056 | 84107 | 84190 | 84405 | 84644 | 84755 |
| 84004 | 84057 | 84108 | 84199 | 84407 | 84645 | 84756 |
| 84005 | 84058 | 84109 | 84201 | 84408 | 84647 | 84757 |
| 84006 | 84059 | 84110 | 84244 | 84409 | 84648 | 84758 |
| 84007 | 84060 | 84111 | 84301 | 84412 | 84651 | 84759 |
| 84008 | 84061 | 84112 | 84302 | 84414 | 84652 | 84760 |
| 84009 | 84062 | 84113 | 84304 | 84415 | 84653 | 84761 |
| 84010 | 84063 | 84114 | 84305 | 84501 | 84654 | 84763 |
| 84011 | 84064 | 84115 | 84306 | 84513 | 84655 | 84765 |
| 84013 | 84065 | 84116 | 84307 | 84515 | 84656 | 84766 |
| 84014 | 84066 | 84117 | 84308 | 84516 | 84657 | 84767 |
| 84015 | 84067 | 84118 | 84309 | 84518 | 84660 | 84770 |
| 84016 | 84068 | 84119 | 84310 | 84520 | 84662 | 84771 |
| 84017 | 84069 | 84120 | 84311 | 84521 | 84663 | 84772 |
| 84018 | 84070 | 84121 | 84312 | 84522 | 84664 | 84774 |
| 84020 | 84071 | 84122 | 84313 | 84523 | 84665 | 84775 |
| 84021 | 84072 | 84123 | 84314 | 84525 | 84667 | 84779 |
| 84022 | 84073 | 84124 | 84315 | 84526 | 84701 | 84780 |
| 84023 | 84074 | 84125 | 84316 | 84528 | 84710 | 84781 |
| 84024 | 84075 | 84126 | 84317 | 84532 | 84711 | 84782 |
| 84025 | 84076 | 84127 | 84318 | 84535 | 84712 | 84783 |
| 84026 | 84078 | 84128 | 84319 | 84537 | 84713 | 84790 |
| 84027 | 84079 | 84129 | 84320 | 84539 | 84714 | 84791 |
| 84028 | 84080 | 84130 | 84321 | 84540 | 84719 | |
| 84029 | 84081 | 84131 | 84322 | 84542 | 84720 | |
| 84031 | 84082 | 84132 | 84323 | 84601 | 84721 | |
| 84032 | 84083 | 84133 | 84324 | 84602 | 84722 | |
| 84033 | 84084 | 84134 | 84325 | 84603 | 84724 | |
| 84035 | 84085 | 84136 | 84326 | 84604 | 84725 | |
| 84036 | 84086 | 84138 | 84327 | 84605 | 84726 | |
| 84037 | 84087 | 84139 | 84328 | 84606 | 84730 | |
| 84038 | 84088 | 84141 | 84329 | 84620 | 84731 | |
| 84039 | 84089 | 84143 | 84330 | 84621 | 84732 | |
| 84040 | 84090 | 84144 | 84331 | 84622 | 84733 | |
| 84041 | 84091 | 84145 | 84332 | 84623 | 84735 | |
| 84042 | 84092 | 84147 | 84333 | 84624 | 84737 | |
| 84043 | 84093 | 84148 | 84334 | 84626 | 84738 | |
| 84044 | 84094 | 84150 | 84335 | 84627 | 84739 | |
| 84045 | 84095 | 84151 | 84336 | 84628 | 84742 | |
| 84046 | 84096 | 84152 | 84337 | 84629 | 84743 | |
| 84047 | 84097 | 84157 | 84338 | 84630 | 84744 | |
| 84049 | 84098 | 84158 | 84339 | 84631 | 84745 | |
| 84050 | 84101 | 84165 | 84340 | 84633 | 84746 | |
| 84051 | 84102 | 84170 | 84341 | 84634 | 84747 | |
| 84052 | 84103 | 84171 | 84401 | 84636 | 84750 | |
| 84053 | 84104 | 84180 | 84402 | 84639 | 84751 | |
| 84054 | 84105 | 84184 | 84403 | 84642 | 84753 | |

| CLLI | ILEC NAME | RATE CENTER (RC) | NEW (N) | NOTES |
|----------|---|------------------|---------|--------------------------------------|
| KAMSUTXC | ALL WEST COMMUNICATIONS, INC. - UTAH | COALVILLE | | <i>*corrected CLLI (RC existing)</i> |
| KAMSUTXC | ALL WEST COMMUNICATIONS, INC. - UTAH | RANDOLPH | | <i>*corrected CLLI (RC existing)</i> |
| KAMSUTXC | ALL WEST COMMUNICATIONS, INC. - UTAH | JORDANELLE | N | |
| KAMSUTXC | ALL WEST COMMUNICATIONS, INC. - UTAH | KAMAS | N | |
| KAMSUTXC | ALL WEST COMMUNICATIONS, INC. - UTAH | TIMBERLAKE | N | |
| GRCYUTXC | BEAR LAKE COMMUNICATIONS | GARDENCITY | | |
| CDCYUT08 | BEEHIVE TEL CO - UT | CEDAR CITY | | |
| CIVLUTXC | BEEHIVE TEL CO - UT | CAINEVILLE | N | |
| GRCKUTXC | BEEHIVE TEL CO - UT | GROUSE CRK | N | |
| KOLBUTXC | BEEHIVE TEL CO - UT | KOLOB | | |
| PKVYUTXC | BEEHIVE TEL CO - UT | PARKVALLEY | N | |
| PRTNUTXC | BEEHIVE TEL CO - UT | PARTOUN | N | |
| RSVYUTXC | BEEHIVE TEL CO - UT | RUSHVALLEY | N | |
| VERNUTXC | BEEHIVE TEL CO - UT | VERNON | | |
| ECRCUTMA | CARBON/EMERY TELECOM, INC. - UT | PRICE | | |
| HLPRUTMA | CARBON/EMERY TELECOM, INC. - UT | PRICE | | |
| PRICUTMA | CARBON/EMERY TELECOM, INC. - UT | PRICE | | |
| FRVWUTXC | CENTRAL UTAH TELEPHONE, INC. | FAIRVIEW | | |
| FRVWUTXC | CENTRAL UTAH TELEPHONE, INC. | SOLDER SMT | N | |
| FRVWUTXC | CENTRAL UTAH TELEPHONE, INC. | SPNSFKCNYN | N | |
| MNPLUTMA | CENTRAL UTAH TELEPHONE, INC. | MTPLEASANT | N | |
| SCFDUTXC | CENTRAL UTAH TELEPHONE, INC. | SCOFIELD | N | |
| BLNGUTXE | CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT | NAT BRIDGE | N | |
| BRCYUTXC | CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT | BEARRIV CY | | |
| DELTUTXC | CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT | DELTA | | |
| FDNGUTXC | CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT | FIELDING | | |
| FLMRUTXC | CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT | FILLMORE | | |
| HLDNUTXC | CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT | HOLDEN | | |
| HOWLUTXC | CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT | PROMONTORY | | |
| HOWLUTXC | CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT | HOWELL | N | |
| MEDWUTXC | CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT | MEADOW | | |
| MNTIUTXC | CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT | MONTICELLO | N | |
| MOABUTXC | CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT | MOAB | | |
| PRTGUTXC | CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT | PORTAGE | | |

| CLLI | ILEC NAME | RATE CENTER (RC) | NEW (N) | NOTES |
|----------|---|------------------|---------|---|
| SCIPUTXC | CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT | SCPIO | | |
| SNVLUTXC | CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT | SNOWVILLE | | |
| THSNUTXC | CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT | THOMPSON | | |
| THTCUTXC | CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT | THATCHER | | |
| TRMNUTXC | CITIZENS TELECOM-UTAH DBA FRONTIER COMM OF UT | TREMONTON | N | |
| EGMTUTAA | DIRECT COMMUNICATION CEDAR VALLEY, LLC | EAGLE MTN | | |
| CSDLUTXC | EMERY TELEPHONE DBA EMERY TELECOM | CASTLEDALE | | |
| CSDLUTXC | EMERY TELEPHONE DBA EMERY TELECOM | GREENRIVER | N | |
| GNSNUTXC | GUNNISON TELEPHONE CO. | GUNNISON | | |
| EPHRUTMA | MANTI TELEPHONE CO. | EPHRAIM | N | |
| MANTUTXC | MANTI TELEPHONE CO. | MANTI | N | |
| ALTAUTMA | QWEST CORPORATION | ALTA | | |
| AMFKUTMA | QWEST CORPORATION | AMERCNFORK | | |
| BEVRUTMA | QWEST CORPORATION | BEAVER | | |
| BGCYUTMA | QWEST CORPORATION | BRIGHAM CY | | |
| BNHDUTMA | QWEST CORPORATION | BRIAN HEAD | N | |
| BNTFUTMA | QWEST CORPORATION | BOUNTIFUL | | |
| CDCYUTMA | QWEST CORPORATION | CEDAR CITY | N | |
| CLFDUTMA | QWEST CORPORATION | CLEARFIELD | | |
| CRNNUTMA | QWEST CORPORATION | BRIGHAM CY | | |
| CTWDUTMA | QWEST CORPORATION | MIDVALE | | <i>*corrected RC name (CLLI existing)</i> |
| DRPRUTMA | QWEST CORPORATION | MIDVALE | | |
| FRTNUTMA | QWEST CORPORATION | FARMINGTON | | |
| GTVLUTMA | QWEST CORPORATION | GRANTSVILLE | | |
| GTVLUTMA | QWEST CORPORATION | TOOELE | N | |
| HBCYUTMA | QWEST CORPORATION | HEBER CITY | | |
| HLDYUTMA | QWEST CORPORATION | MIDVALE | | <i>*corrected RC name (CLLI existing)</i> |
| HNVIUTMA | QWEST CORPORATION | OGDEN | | |
| HRCNUTMA | QWEST CORPORATION | ST GEORGE | | |
| HYRMUTMA | QWEST CORPORATION | LOGAN | | <i>*corrected RC name (CLLI existing)</i> |
| KRNSUTMA | QWEST CORPORATION | MIDVALE | | <i>*corrected RC name (CLLI existing)</i> |
| KYVLUTMA | QWEST CORPORATION | KAYSVILLE | | |
| LEDSUTMA | QWEST CORPORATION | ST GEORGE | | |
| LEHIUTMA | QWEST CORPORATION | LEHI | | |

| CLLI | ILEC NAME | RATE CENTER (RC) | NEW (N) | NOTES |
|----------|-------------------|------------------|---------|--|
| LOGNUTMA | QWEST CORPORATION | LOGAN | | |
| LYTNUTMA | QWEST CORPORATION | CLEARFIELD | | |
| MAGNUTNM | QWEST CORPORATION | MIDVALE | | <i>*corrected RC name (CLLI existing)</i> |
| MDVAUTMA | QWEST CORPORATION | MIDVALE | | |
| MONRUTMA | QWEST CORPORATION | MONROE | | |
| MRGNUTMA | QWEST CORPORATION | MORGAN | | <i>*corrected RC name (CLLI existing)</i> |
| MRRYUTMA | QWEST CORPORATION | MURRAY | | |
| MTGNUTMA | QWEST CORPORATION | MORGAN | | |
| NEPHUTMA | QWEST CORPORATION | NEPHI | | |
| NSLKUTMA | QWEST CORPORATION | BOUNTIFUL | | |
| OGDNUTMA | QWEST CORPORATION | OGDEN | | |
| OGDNUTNO | QWEST CORPORATION | OGDEN | | |
| OGDNUTSO | QWEST CORPORATION | OGDEN | | |
| OGDNUTWE | QWEST CORPORATION | OGDEN | | |
| OREMUTMA | QWEST CORPORATION | PROVO | | <i>*corrected RC name (CLLI existing)</i> |
| PLGVUTMA | QWEST CORPORATION | PLEASATGRV | | |
| PRCYUTMA | QWEST CORPORATION | PARK CITY | | |
| PROVUTMA | QWEST CORPORATION | PROVO | | |
| PRWNUTMA | QWEST CORPORATION | PAROWAN | | |
| PYSNUTMA | QWEST CORPORATION | PAYSON | | |
| RCFDUTMA | QWEST CORPORATION | RICHFIELD | | |
| RCMDUTMA | QWEST CORPORATION | LOGAN | | <i>*corrected RC name (CLLI existing)</i> |
| ROY UTMA | QWEST CORPORATION | CLEARFIELD | | |
| RVTNUTMA | QWEST CORPORATION | MIDVALE | | <i>*corrected RC name (CLLI existing)</i> |
| SALMUTMA | QWEST CORPORATION | SPANIHFORK | | |
| SALNUTMA | QWEST CORPORATION | SALINA | | |
| SLKCUTEA | QWEST CORPORATION | SALT LAKE | | |
| SLKCUTMA | QWEST CORPORATION | SALT LAKE | | <i>*corrected ILEC/RC info (CLLI existing)</i> |
| SLKCUTSO | QWEST CORPORATION | SALT LAKE | | |
| SLKCUTWE | QWEST CORPORATION | SALT LAKE | | |
| SMFDUTMA | QWEST CORPORATION | LOGAN | | <i>*corrected RC name (CLLI existing)</i> |
| SNTQUTMA | QWEST CORPORATION | PAYSON | | <i>*corrected RC name (CLLI existing)</i> |
| SPDLUTMA | QWEST CORPORATION | ST GEORGE | | |
| SPFKUTMA | QWEST CORPORATION | SPANIHFORK | | |

| CLLI | ILEC NAME | RATE CENTER (RC) | NEW (N) | NOTES |
|----------|--|------------------|---------|--|
| SPVLUTMA | QWEST CORPORATION | SPRINGVL | | |
| STGRUTMA | QWEST CORPORATION | ST GEORGE | | |
| TOOLUTMA | QWEST CORPORATION | TOOELE | | |
| VEYOUTMA | QWEST CORPORATION | ST GEORGE | | |
| WASHUTMA | QWEST CORPORATION | ST GEORGE | | |
| WJRDUTMA | QWEST CORPORATION | MIDVALE | | |
| DGWYUTMA | SKYLINE TELECOM | DUGWAY | | |
| EURKUTXC | SKYLINE TELECOM | EUREKA | | |
| GSHNUTXC | SKYLINE TELECOM | GOSHEN | | |
| MORNUTXC | SKYLINE TELECOM | MORONI | N | |
| WNDVUTMA | SKYLINE TELECOM | WENDOVER | | <i>*corrected ILEC name (CLLI/RC existing)</i> |
| ANTMUTXC | SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC. | ANTIMONY | | |
| APVYUTXC | SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC. | APPLE VLLY | | |
| BCKNUTXC | SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC. | BICKNELL | N | |
| BRYLUTAA | SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC. | BERYL | | |
| CRVLUTXC | SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC. | CIRCLEVL | N | |
| ENTRUTXC | SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC. | ENTERPRISE | | |
| ESCLUTXC | SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC. | ESCALANTE | | |
| HATCUTXC | SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC. | HATCH | | |
| KSHRUTAA | SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC. | KOOSHAREM | | |
| LOA UTXC | SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC. | LOA | N | |
| MLFRUTXC | SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC. | MILFORD | | |
| MRVAUTXC | SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC. | MARYSVALE | | |
| ORVLUTXC | SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC. | ORDERVILLE | N | |
| PNGTUTXC | SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC. | PANGUITCH | | |
| PNGTUTXC | SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC. | BEAVER | N | |
| PNGTUTXC | SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC. | CEDAR CITY | N | |
| PNGTUTXC | SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC. | ST GEORGE | N | |
| ALMTUTXC | UBTA-UBET COMMUNICATIONS, INC. DBA STRATA NETWORKS | ALTAMONT | | |
| DCHSUTMA | UBTA-UBET COMMUNICATIONS, INC. DBA STRATA NETWORKS | DUCHESNE | | |
| FRLDUTXC | UBTA-UBET COMMUNICATIONS, INC. DBA STRATA NETWORKS | FRUITLAND | | |
| FTBTUTXC | UBTA-UBET COMMUNICATIONS, INC. DBA STRATA NETWORKS | FLATTOP | | |
| LAPNUTXC | UBTA-UBET COMMUNICATIONS, INC. DBA STRATA NETWORKS | LAPOINT | | |
| NEOLUTXC | UBTA-UBET COMMUNICATIONS, INC. DBA STRATA NETWORKS | NEOLA | | |

| CLLI | ILEC NAME | RATE CENTER (RC) | NEW (N) | NOTES |
|-------------|--|-------------------------|----------------|--------------|
| RNDTUTXC | UBTA-UBET COMMUNICATIONS, INC. DBA STRATA NETWORKS | RANDLETT | | |
| RSVTUTMA | UBTA-UBET COMMUNICATIONS, INC. DBA STRATA NETWORKS | ROOSEVELT | | |
| TABNUTXC | UBTA-UBET COMMUNICATIONS, INC. DBA STRATA NETWORKS | TABIONA | | |
| VRNLUTMA | UBTA-UBET COMMUNICATIONS, INC. DBA STRATA NETWORKS | FLATTOP | N | |
| VRNLUTMA | UBTA-UBET COMMUNICATIONS, INC. DBA STRATA NETWORKS | VERNAL | N | |
| CHMWUTXC | UNION TELEPHONE CO. - WY | CHRISTMMDW | N | |
| DTJHUTXC | UNION TELEPHONE CO. - WY | DUTCH JOHN | | |
| GNDLUTXC | UNION TELEPHONE CO. - WY | GREENDALE | | |
| MANLUTXC | UNION TELEPHONE CO. - WY | MANILA | | |

EXHIBIT 3

Lifeline Offering

Q LINK WIRELESS LIFELINE OFFERING EFFECTIVE 12/1/2019

LIFELINE NON-TRIBAL:

1000 Minutes & 3 GB Data (Q LINK ALWAYS ON)

1000 anytime minutes per month

Unlimited text and picture messaging

3 GB data per month

Minutes & data do not rollover

Net cost to Lifeline customer: **\$0**

LIFELINE TRIBAL:

Unlimited Talk & Text & 3 GB Data (Q LINK ALWAYS ON TRIBAL)

Unlimited anytime voice minutes per month

Unlimited text and picture messaging

3 GB data per month (*no rollover*)

Net cost to Tribal Lifeline customer: **\$0**

All packages include:

- Free Wi-Fi enabled Smartphone, or data-capable tablet/hotspot 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 cost

ADDITIONAL AIRTIME

Available for purchase at <https://qlinkwireless.com/members/cart/quickpurchase.aspx>