

---

Petition of Q Link Wireless LLC for Designation as an Eligible Telecommunications Carrier in the State of Utah	<u>DOCKET NO. 12-2549-01</u>
Petition to Amend Q Link Wireless LLC's Designation as an Eligible Telecommunications Carrier to Participate in the Utah Universal Service Fund	<u>DOCKET NO. 18-2549-02</u>
Petition of Q Link Wireless LLC to Expand its Eligible Telecommunications Carrier Service Area in Utah	<u>DOCKET NO. 20-2549-01</u> <u>ORDER REVOKING ELIGIBLE TELECOMMUNICATIONS CARRIER (ETC) DESIGNATION OF Q LINK WIRELESS LLC IN THE STATE OF UTAH</u>

---

ISSUED: November 7, 2025

### **INTRODUCTION**

By Order dated December 14, 2012, Q Link Wireless LLC ("Q Link"), was designated by the Utah Public Service Commission (PSC) as an Eligible Telecommunications Carrier ("ETC") to offer Lifeline universal services in specific areas within the State of Utah, thus allowing it to receive funds through the federal universal services program pursuant to 47 U.S.C. § 214(e)(2), but was specifically excluded from seeking support from Utah's Universal Service Fund ("Federal Lifeline Docket").<sup>1</sup> Q Link's ETC designation was later amended by Order dated October 25,

---

<sup>1</sup> Docket No. 12-2549-01.

2018,<sup>2</sup> allowing Q Link to seek funds from the Utah Universal Service Fund (“Utah USF”) (“Amended ETC Docket”).<sup>3</sup>

### **PROCEDURAL BACKGROUND**

On August 29, 2025, the PSC issued<sup>4</sup> an Order to Show Cause outlining that it had become aware of, among other things, Q Link’s conviction of certain crimes relating to its Lifeline activities and the consequences thereon, including the Federal Communications Commission (FCC) suspending Q Link from participating in any universal support programs and the FCC’s initiation of a debarment proceeding. The Order to Show Cause ordered Q Link to file a verified statement by September 29, 2025, with the PSC explaining why its ETC designation in the State of Utah should not be revoked. The Order to Show Cause advised Q Link that if it made such a filing, a formal adjudicative process would be commenced on the question of ETC revocation, allowing Q Link and any interested person to appear and participate therein. The Order to Show Cause further stated that if Q Link failed to timely make such a filing, the PSC intended to immediately revoke Q Link’s ETC designation in the State of Utah.

---

<sup>2</sup> Docket No. 18-2549-02.

<sup>3</sup> By Order dated May 7, 2020, in Docket No. 20-2549-01, Q Link’s service area as an ETC was expanded to include anywhere within the State of Utah that its underlying facilities-based providers had wireless coverage (“Lifeline Expansion Docket”).

<sup>4</sup> The Order to Show Cause was served by U.S. mail to the two addresses for Q Link on file with the PSC, specifically its address in Florida and to the address of Q Link’s registered agent in Utah. The copy of the Order to Show Cause sent to Q Link’s address in Florida was returned to the PSC as “not deliverable” and “unable to forward.” However, the copy of the Order to Show Cause mailed to Q Link’s registered agent in Utah has not been returned.

Q Link failed to meet this deadline, and has still not responded to the Order to Show Cause as of the date of this Order.

The Order to Show Cause also requested the Division of Public Utilities (DPU) to investigate Q Link's actions regarding its conviction, suspension, and the debarment proceedings, and to provide the PSC with a report and recommendation concerning those actions.

## **DISCUSSION**

### ***Federal Background***

On October 15, 2024, Q Link, and its owner and chief executive officer, Issa Asad ("Asad"), pled guilty to conspiring to defraud and commit offenses against the United States in connection with a years-long scheme to fraudulently claim over \$100 million from the Lifeline program. Q Link and Asad admitted to engaging in conduct designed to mislead the FCC as to how many of Q Link's Lifeline subscribers were continuing to use their Lifeline service and to prevent subscribers who sought to de-enroll from ending their relationship with Q Link, which would have prevented Q Link from billing the Lifeline program for these households.<sup>5</sup>

On November 8, 2024, the FCC Enforcement Bureau issued a notice of suspension to Q Link.<sup>6</sup> That notice recounts that Q Link and Asad defrauded the

---

<sup>5</sup> See 2024 FCC LEXIS 2920 (October 15, 2024).

<sup>6</sup> See Letter from Christopher J. Sova, Federal Communications Commission, to Issa Asad, Chief Executive Officer, Q Link Wireless LLC, et al., DA 24-1131. A copy of this letter may be found at (<https://docs.fcc.gov/public/attachments/DA-24-1131A1.pdf>).

Lifeline program of more than \$100 million since 2013,<sup>7</sup> based on Q Link's falsification of documents to the FCC and use of misleading tactics to prevent customers from discontinuing service with Q Link or to coerce customers into accepting Lifeline services.<sup>8</sup> Both Q Link and Asad entered into plea agreements on October 15, 2024, for conspiring to defraud and commit offenses against the United States, which served as the basis for the FCC Enforcement Bureau's actions.<sup>9</sup> Q Link's suspension prohibits it from "participating in or receiving any benefit associated with the Lifeline program [and] any other program funded by federal universal service support mechanisms[.]"<sup>10</sup> and Q Link agreed in its plea agreement that "[it] shall not participate ... in any program administered by the FCC[.]"<sup>11</sup> The notice also states the FCC Enforcement Bureau is commencing a proceeding to debar Q Link from future participation in all federal universal service support mechanisms, stating that the FCC is required to debar Q Link "absent extraordinary circumstances[.]"<sup>12</sup>

On December 12, 2024, the Federal Register published an official notice on behalf of the FCC, stating that Q Link had been suspended from the federal Lifeline

---

<sup>7</sup> See *id.* at 2-3.

<sup>8</sup> See *id.* at 3.

<sup>9</sup> See *id.* at 1 (citing *United States v. Asad & Q Link Wireless LLC*, Criminal Docket No. 1:24-cr-20363-RAR, Plea Agreement (S.D. Fla., filed Oct. 15, 2024)).

<sup>10</sup> *Id.* at 2.

<sup>11</sup> *Id.* at 4, n.26.

<sup>12</sup> *Id.* at 2.

program and all federal universal service support mechanisms. Additionally, the notice stated that debarment proceedings would be commenced against Q Link.<sup>13</sup>

***DPU's Investigation***

In response to the PSC's request in the Order to Show Cause, on October 14, 2025, DPU provided a report and recommendation concerning its investigation ("DPU Comments"). DPU recounts the FCC's suspension of, and initiation of debarment proceedings<sup>14</sup> against, Q Link, stating "Q Link ha[s] been suspended from the federal Lifeline program and all federal universal service support mechanisms."<sup>15</sup> DPU's investigation also found that Q Link's account with the FCC Form 499 filings database is no longer active and that the administrator could not contact Q Link.<sup>16</sup> DPU further discovered that Q Link's business registration with the Utah Division of Corporations and Commercial Code – Business Registration is inactive and has been administratively dissolved.<sup>17</sup>

DPU also states that Q Link, as an ETC and Lifeline provider, had received payments from the Utah USF pursuant to the orders in the Amended ETC Docket and Lifeline Expansion Docket from 2019 through December 2024 totaling at least

---

<sup>13</sup> See *Notice of Suspension and Commencement of Proposed Debarment Proceedings; Federal Lifeline Program*, [89 Fed. Reg. 239,100487](#) (F.C.C. December 12, 2024).

<sup>14</sup> DPU notes that a decision on the debarment proceeding has not yet been published in the Federal Register. See DPU Comments at 2.

<sup>15</sup> *Id.*

<sup>16</sup> See *id.* at 3.

<sup>17</sup> See *id.* at 2.

\$1,889,923.<sup>18</sup> DPU further states that during this same time period, Q Link was overpaid from the Utah USF in the amount of \$269,935, because Q Link did not remit payment for statutorily mandated per-line surcharges it collected from its customers.<sup>19</sup>

Based on the evidence from its investigation, DPU recommends the PSC terminate Q Link's authority to provide Lifeline services in the State of Utah and revoke Q Link's ETC designation in the State of Utah.<sup>20</sup>

Other evidence shows that the Orders in the Federal Lifeline Docket, the Amended ETC Docket, and the Lifeline Expansion Docket were either issued based on Q Link meeting and maintaining certain conditions or were issued based on the PSC's reliance on representations Q Link made in the various dockets. For example, the Order in the Federal Lifeline Docket was conditioned on Q Link at all times meeting the requirements for federal ETC designation.<sup>21</sup> That same Order was further conditioned on Q Link paying all applicable state and local regulatory fees, including, but not limited to, universal service fees, emergency services fees, and relay services fees.<sup>22</sup> In addition, in its verified application and testimony filed in support of the Amended ETC Docket, Q Link acknowledged that its participation in, and payment from, the Utah USF was available only to service providers that meet FCC

---

<sup>18</sup> See *id.*

<sup>19</sup> See *id.*

<sup>20</sup> See *id.* at 3.

<sup>21</sup> See Federal Lifeline Docket, Order at 6, ¶ F.

<sup>22</sup> See *id.*, ¶ D.

requirements and standards for participation in the federal low-income Lifeline program.<sup>23</sup> Moreover, Q Link certified its representation to the PSC that it would comply with the service requirements applicable to its receipt of federal Lifeline support and Utah USF payments,<sup>24</sup> and that it would protect against waste, fraud, and abuse, by being a committed trusted steward of public resources and the Lifeline program.<sup>25</sup>

### **FINDINGS OF FACT AND CONCLUSIONS OF LAW**

The FCC has stated, a “state commission may revoke a carrier’s ETC designation if the carrier fails to comply with the ETC eligibility criteria.”<sup>26</sup> The FCC has also stated that “state commissions possess the authority to rescind ETC designations for failure of an ETC to comply with the requirements of section 214(e) of the [Communications Act of 1934] or any other conditions imposed by the state.”<sup>27</sup> Q Link’s status as an ETC in the State of Utah, and its participation in the Utah USF, is at least conditioned on

---

<sup>23</sup> See Amended ETC Docket, Petition of Q Link Wireless, LLC to Change its ETC Designation, May 23, 2018, at 7, and Direct Testimony of Issa Asad on behalf of Q Link Wireless, LLC, June 22, 2018, at 9.

<sup>24</sup> See Lifeline Expansion Docket, Petition, February 14, 2020, at 4.

<sup>25</sup> See *id.*, at 6.

<sup>26</sup> *In the Matter of Federal-State Joint Board on Universal Service; Western Wireless Corporation Petition for Preemption of an Order of the South Dakota Public Utilities Commission*, FCC 00-248, ¶ 15 (2000).

<sup>27</sup> *In the Matter of Connect America Fund*, 26 FCC Rcd 17663, note 999 (2011). See also *Federal-State Joint Board on Universal Service, Report and Order*, CC Docket No. 96-45, FCC 05-46, <https://docs.fcc.gov/public/attachments/FCC-05-46A1.pdf> at 34 (state commissions may revoke ETC designations “for failure ... to comply with the requirements of [47 U.S.C. § 214(e)] or any other conditions imposed by the state.”).

providing services consistent with the FCC's Lifeline program.<sup>28</sup> Under FCC rules, all ETCs must offer Lifeline service.<sup>29</sup>

We find the evidence shows that Q Link's criminal conviction and FCC suspension demonstrates it no longer complies with the FCC's eligibility criteria and can no longer offer Lifeline services. Thus, Q Link can no longer meet its FCC obligations as an ETC. We further find the evidence shows that Q Link has violated express conditions of the Federal Lifeline Docket Order, and has acted contrary to representations the PSC relied upon in issuing the Orders in the Amended ETC Docket and the Lifeline Expansion Docket. Specifically, Q Link no longer meets the requirements for federal ETC designation, it has failed to pay all applicable state and local regulatory fees, and it has been criminally convicted of committing acts that belie its representations to protect against waste, fraud, and abuse, and be a committed trusted steward of public resources and the Lifeline program.

We also find that the reasons Q Link can no longer offer Lifeline services – its criminal conviction, its suspension by the FCC, and its pending debarment proceedings – demonstrate that it is not in the public interest for Q Link to continue to be authorized as an ETC in the State of Utah. Finally, we find that Q Link was afforded meaningful notice and opportunity to respond to our Order to Show Cause, but has failed to avail itself of that opportunity.

---

<sup>28</sup> See *e.g.*, Utah Code §§ 54-8b-15(3) & (15)(a).

<sup>29</sup> See 47 CFR § 54.405.

Accordingly, based on the foregoing and our statutory authority,<sup>30</sup> we conclude that Q Link's ETC designation in the State of Utah, as embodied in the Federal Lifeline Docket, the Amended ETC Docket, and the Lifeline Expansion Docket, should be revoked and Q Link's authority to provide Lifeline services in the State of Utah should be terminated.

**ORDER**

Based on the foregoing Discussion, and Findings of Fact and Conclusions of Law, Q Link's designation as an ETC in the State of Utah is hereby revoked and Q Link's authority to provide Lifeline services in the State of Utah is hereby terminated.

DATED at Salt Lake City, Utah, November 7, 2025.

/s/ John E. Delaney  
Presiding Officer

Approved and confirmed November 7, 2025 as the Order of the Public Service Commission of Utah.

/s/ Jerry D. Fenn, Commissioner

/s/ David R. Clark, Commissioner

/s/ John S. Harvey Ph.D., Commissioner

Attest:

/s/ Gary L. Widerburg  
PSC Secretary  
DW#342646

---

<sup>30</sup> See e.g., Utah Code Ann. § 54-4-1.

Notice of Opportunity for Agency Review or Rehearing

Pursuant to Utah Code Ann. §§ 63G-4-301 and 54-7-15, a party may seek agency review or rehearing of this written order by filing a request for review or rehearing with the PSC within 30 days after the issuance of the order. Responses to a request for agency review or rehearing must be filed within 15 days of the filing of the request for review or rehearing. If the PSC fails to grant a request for review or rehearing within 30 days after the filing of a request for review or rehearing, it is deemed denied. Judicial review of the PSC's final agency action may be obtained by filing a Petition for Review with the Utah Supreme Court within 30 days after final agency action. Any Petition for Review must comply with the requirements of Utah Code Ann. §§ 63G-4-401, 63G-4-403, and the Utah Rules of Appellate Procedure.

CERTIFICATE OF SERVICE

I CERTIFY that on November 7, 2025, a true and correct copy of the foregoing was placed for delivery and/or sent to the following as indicated below:

By USPS:

Q Link Wireless, LLC  
499 Sheridan St., Ste. 300  
Dania, FL 33004

InCorp Services, Inc.  
Utah Registered Agent for Q Link Wireless, LLC  
107 S 1470 E, Ste 201  
St. George, UT 84790

By Email:

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

Madison Galt ([mgalt@utah.gov](mailto:mgalt@utah.gov))  
Division of Public Utilities

Alyson Anderson ([akanderson@utah.gov](mailto:akanderson@utah.gov))  
Cameron Irmis ([cirmas@utah.gov](mailto:cirmas@utah.gov))  
Asami Kobayashi ([akobayashi@utah.gov](mailto:akobayashi@utah.gov))  
Jennifer Ntiamoah ([jntiamoah@utah.gov](mailto:jntiamoah@utah.gov))  
Bela Vastag ([bvastag@utah.gov](mailto:bvastag@utah.gov))  
Alex Ware ([aware@utah.gov](mailto:aware@utah.gov))  
([ocs@utah.gov](mailto:ocs@utah.gov))  
Office of Consumer Services

/s/ Melissa R. Paschal  
Administrative Assistant