

November 8, 2018

Ms. Marlene H. Dortch
Secretary, Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Bridging the Digital Divide for Low-Income Consumers*, WC Docket No. 17-287; *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42; *Telecommunications Carriers Eligible for Universal Service Support*, WC Docket No. 09-197

Dear Ms. Dortch:

On November 6, 2018, Issa Asad, Chief Executive Officer of Q Link Wireless, LLC (“Q Link”), Paul Turner, President of Q Link, Rafael Carvajal, Chief Operating Officer of Q Link, Noha Asad, Chief Business Development Officer of Q Link, John Heitmann of Kelley, Drye & Warren LLP, and Shiva Goel and I of Harris, Wiltshire & Grannis LLP met with Ryan Palmer, Jodie Griffin, Allison Baker, and Allison Jones of the Wireline Competition Bureau.

We discussed Q Link’s mission of leveraging technology to expand rural Lifeline access while enhancing efficiency and program compliance. We also discussed how USAC’s National Verifier interfaces work better for consumers in urban areas served by carrier sales agents, but not at all for consumers in rural and suburban communities that depend on online enrollment. We thus explained the need for the Bureau or the Commission to direct USAC to implement the carrier API necessary for successful carrier-assisted online enrollment.¹ We explained that Q Link currently has no effective means to complete online Lifeline enrollments in Colorado and Utah, following the November 2, 2018 “hard launch.” We also explained that without the bridge that would be provided by a grant of Q Link’s request for an interim waiver to enable it to batch-bulk transfer consumer information to the National Verifier for eligibility determinations,² rural, suburban and mobility challenged consumers, including veterans and seniors, who rely heavily on carrier-assisted online enrollment, would effectively be denied access to Lifeline.

Addressing security-related concerns, we explained that a carrier API will be more secure than an open public access portal because access is private and can be strictly controlled and validated, including with respect to the IP address used to access the National Verifier, as well as other information ensuring that the entity utilizing the API is properly credentialed and validated. In addition, a properly designed carrier API would not permit access to alter underlying

¹ See Emergency Petition of Q Link Wireless, LLC for an Order Directing the Universal Service Administrative Company to Implement Machine-to-Machine Interfaces for the National Verifier, WC Docket Nos. 17-287, 11-42 & 09-197 (filed July 5, 2018).

² See Petition of Q Link Wireless, LLC for a Limited Waiver To Permit Alternative Transmission of Lifeline Eligibility Information and Customer Certifications to the National Verifier, WC Docket Nos. 17-287, 11-42 & 09-197 (filed Nov. 1, 2018).

databases used in rendering an eligibility determination. We also noted that there are no known issues of fraud committed because of the NLAD's carrier APIs. Concerns raised regarding potential abuse in the past of NLAD duplication and identity checks involved manual exceptions processes that occurred outside of the NLAD API. Q Link does not utilize any exceptions process, and its waiver request similarly does not contemplate the use of any exceptions processes. If the consumer claims a database error, Q Link directs them to the entity administering the database so that the consumer can get the asserted error corrected.

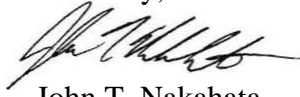
We also discussed the details of Q Link's request for an interim waiver that would provide a bridge for rural Lifeline access in "hard launch" states while the API issue is decided. We explained that:

- The interim waiver would allow Q Link to resume online outreach to and enrollment of new customers in Colorado and Utah, even before an API is implemented.
- The interim waiver requested by Q Link would leave the eligibility determination entirely to the National Verifier in all cases. It merely would provide Q Link with alternative methods for transferring eligibility-related information and documentation, including customer certifications, to the National Verifier.
- For consumers whose eligibility can be confirmed by a program database in a "hard launch" state, the waiver would allow Q Link to leverage its existing API access to the same databases accessed by the National Verifier and submit the results of those database "dips" along with customer certifications to the National Verifier for an eligibility determination. The National Verifier would in no way be bound to rely on Q Link's dips, could conduct its own dips, and would remain the final word on eligibility.
- For consumers qualifying based on proof of income or participation in programs for which a database is not available, the waiver would allow Q Link to compile eligibility documentation and customer certifications and batch-bulk transfer them to the National Verifier for purposes of rendering an eligibility determination.
- In all cases, the National Verifier would essentially conduct the same review for eligibility that it would conduct if it received a paper application. To minimize burdens on USAC, Q Link would ensure that the transfers integrate with existing systems and procedures, as it has done with many states, and would only submit applications that have passed Q Link's own extensive checks for identity and eligibility. Q Link is available to discuss appropriate bulk data transfer methods and formatting with USAC.

A handout distributed at the meeting is attached to this letter. Please contact me if you have any questions.

Marlene H. Dortch
November 8, 2018
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Sincerely,

A handwritten signature in black ink, appearing to read 'John T. Nakahata', written in a cursive style.

John T. Nakahata
Counsel to Q Link Wireless, LLC

cc: Ryan Palmer
Jodie Griffin
Allison Baker
Allison Jones

Attachments

ATTACHMENT

NATIONAL VERIFIER SERVICE PROVIDER API



APIs are used everyday to facilitate online transactions and the delivery of government benefits

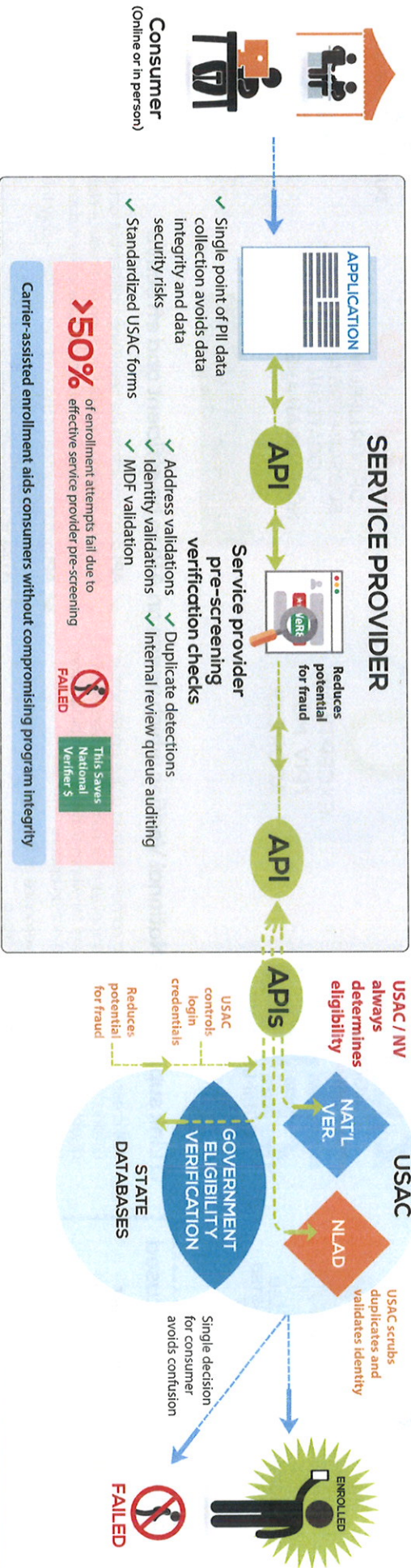


APIs are used by USAC today in NLAD (National Lifetime Accountability Database)



APIs are used today by ETCs and National Verifier to access state databases

A SERVICE PROVIDER API IS ESSENTIAL TO A SUCCESSFUL NATIONAL VERIFIER



A National Verifier Service Provider API is the most effective and secure means of enrolling rural Americans and disabled Veterans and Seniors... plus it will save millions of dollars annually in National Verifier operations costs.



A TECHNOLOGY COMPANY PROVIDING LIFELINE SERVICE IN A UNIQUE CONSUMER-CENTRIC AND COMPLIANCE-FOCUSED WAY

Q Link is a technology company that develops systems and processes to reach and serve low-income customers in a unique, compliance-centric way. We set out to do business differently from all other Lifeline providers.

- ✓ **We use technology** to identify potentially eligible consumers, raising awareness to and educating low-income Americans about Lifeline, including its eligibility rules.
- ✓ **We use technology** to facilitate enrollment of eligible Lifeline subscribers while rejecting incomplete or ineligible applications.
- ✓ **We use technology** to provide a superior customer experience that reduces churn for us and transaction expenses for Lifeline program administration.
- ✓ **We are compliance-focused and avoid risk:** we have an IP address associated with every enrollment – as well as an email address and alternate phone number – ensuring that real people are enrolling.

100%
OF CUSTOMERS ENROLLED
THROUGH CARRIER-ASSISTED
ONLINE ENROLLMENT

ZERO
AGENTS
ZERO
COMMISSIONS

0
EXCEPTIONS
TPIV, MDF
ADDRESS

67%
OF OUR LIFELINE
SUBSCRIBERS ARE
LOCATED IN
NON-URBAN AREAS

5
DUPLICATE CHECKS
PRE -497

3
MDF CHECKS
PRE -497

We are customer focused

We communicate with our customers regularly and offer perks to keep them engaged.

We care and respond in times of crisis – we gave all of our Puerto Rico customers unlimited voice, text and broadband in the wake of last year's hurricanes.

Q Link supports the National Verifier which needs an API to be efficient and effective

- ✓ **API** is essential to providing carrier-assisted online enrollment in Lifeline, which is especially important for rural subscribers, seniors, disabled veterans and others for whom travel to a retail location (storefront or tent) is often not an option.
- ✓ **API** is essential to good governance of the Lifeline program, reducing costs and risks of fraud.
- ✓ **API** will not in any way displace the role of the National Verifier in making eligibility determinations.

- ✓ **API** does not introduce new vulnerabilities but actually helps protect against fraud by allowing carriers to screen and reduce National Verifier workload and by allowing USAC to control access (as it does with the NLAD API).
- ✓ **API** actually protects the National Verifier – only those with USAC-specified credentials get access.
- ✓ **Q Link Emergency Petition:** stakeholders are united in support for the API.
- ✓ **Q Link Waiver Petition:** for an interim period, we simply ask that we can continue to leverage our API access to CO and UT databases and that we send the results of those dips and other eligibility documentation to the National Verifier in bulk form daily.