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October 14, 2015

**VIA ECFS AND
HAND DELIVERY**

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street
Washington, D.C. 20554

Re: Request for Confidential Treatment of *Ex Parte* Notice filed in *Telecommunications Carriers Eligible for Universal Service Support* (WC Docket No. 09-197); Q LINK WIRELESS LLC's *Petition for Limited Designation as an Eligible Telecommunications Carrier in the States of Alabama, Connecticut, Delaware, Florida, New Hampshire, New York, North Carolina, Tennessee, the Commonwealth of Virginia, and the District of Columbia*

Dear Ms. Dortch:

Enclosed please find an *Ex Parte* Notice filed on behalf of Q LINK WIRELESS LLC ("Q LINK" or the "Company") in the above-captioned matter. Confidential treatment is requested for certain information provided in the Attachment to the enclosed *Ex Parte* Notice, pursuant to Sections 0.457 and 0.459 of the Commission's rules.¹ The confidential material is clearly marked. The marked information is sensitive company information not available to the public, including trade secrets and commercial information that falls within Exemption 4 of the Freedom of Information Act,² and Q LINK would suffer substantial harm if this information were disclosed.

As required by Section 0.459(b) of the Commission's rules, Q LINK provides the following information regarding its request for confidential treatment:

1. Confidential treatment is requested for certain information provided in the Attachment to Q LINK's enclosed *Ex Parte* Notice.
2. Q LINK is submitting this information in support of its above-captioned request that it be designated as an Eligible Telecommunications Carrier.
3. The information for which Q LINK seeks confidential treatment contains sensitive trade secrets and commercial information which is privileged and is customarily guarded from competitors.

¹ 47 C.F.R. §§ 0.457 and 0.459.

² 5 U.S.C. § 552(b)(4) & (7).

4. The wireless telecommunications industry is highly competitive.³ There is competition in the provision of wireless Lifeline service from standard wireless ETCs and the special Lifeline ETCs that have already been designated. Information of the type provided by Q LINK could compromise Q LINK's position in this highly competitive industry by giving its competitors critical data relating to Q LINK's operations.
5. The release of this information will cause substantial competitive harm to Q LINK. Disclosure would give competitors access to privileged information that may affect the actions of those competitors.
6. Q LINK considers this information to be proprietary and confidential and does not distribute such information to any party outside of the Company, with the exception of outside counsel, and to state public utility commissions only when granted confidential treatment.
7. This information is not available to the public and has not been disclosed to any other third party, with the exception of outside counsel and to state public utility commissions that have granted confidential treatment for said information.
8. The information should not be released for public inspection, as it contains proprietary company information that is competitively sensitive. At some point, however, this information will become stale. At minimum, the information should be protected for not less than ten years.

For the foregoing reasons, Q LINK respectfully requests that the Commission provide confidential treatment for the identified information.

Please do not hesitate to contact me if you have any questions. Thank you.

Respectfully submitted,

/s/ LANCE STEINHART

Lance J.M. Steinhart

Managing Attorney

Lance J.M. Steinhart, P.C.

Attorneys for Q LINK WIRELESS LLC

Enclosures

cc: Issa Asad
Ryan Palmer
Jay Schwarz
Jodie Griffin
Garnet Hanly
Nathan Eagan
Christian Hoefly

³ See generally *Thirteenth Annual CMRS Competition Report*, 24 FCC Rcd 6185 (2009).

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Re: *Ex Parte* Notice - *Telecommunications Carriers Eligible for Universal Service Support* (WC Docket No. 09-197); Q LINK WIRELESS LLC's *Petition for Limited Designation as an Eligible Telecommunications Carrier in the States of Alabama, Connecticut, Delaware, Florida, New Hampshire, New York, North Carolina, Tennessee, the Commonwealth of Virginia, and the District of Columbia,*

Dear Ms. Dortch:

On Friday, October 9, 2015, Lance Steinhart, State and FCC counsel for Q LINK WIRELESS LLC ("Q LINK" or the "Company") and John Nakahata, FCC counsel for Q LINK, along with Q LINK representatives (Issa Asad, CEO; Rafa Carvajal, COO; Paul Turner, President; Noha Asad, Vice President; Andrew Lermsider, CMO; Roi Sadeh, Development & Technology, and Maybell Kelly, Compliance Director), and Chuck Campbell of CGM, LLC, met with Ryan Palmer, Division Chief; Jay Schwarz, Acting Deputy Division Chief; and Jodie Griffin, Garnet Hanly, Nathan Eagan, and Christian Hoefly of the Telecommunications Access Policy Division of the Wireline Competition Bureau. We discussed the updates in Q LINK's above-captioned Petition for Designation as an Eligible Telecommunications Carrier ("ETC"), as amended on August 26, 2015.

Issa Asad made a brief introduction and overview of the Company, and emphasized the Company's commitment to comply with all FCC rules and to prevent waste, fraud, and abuse of the Lifeline program. We discussed Q LINK's enrollment processes and procedures regarding fraud prevention, and provided a demonstration of Q LINK's automated customer enrollment system, including the specific checks performed at each stage of the application process in order to verify the applicant's identity and eligibility. We also discussed Q LINK's operational model and revised proposed Lifeline offering. In an effort to help close the digital divide, Q LINK's rate plans will provide Lifeline customers in FCC states with access to data.

Finally, certain aspects of the Second Further Notice of Proposed Rulemaking¹ were discussed, including record retention requirements and third party versus company customer validation.

As demonstrated by its unique approach to the customer relationship and history of high standards of compliance, Q LINK is committed to meeting the needs of Lifeline customers and to careful stewardship of the Lifeline program. Approval of Q LINK's ETC Petition, as amended, would allow Q LINK to substantially expand the areas where it can serve customers, thereby expanding the availability of telephone and broadband services for low income customers.

Attached is a copy of the presentation deck that was provided at the meeting. Please do not hesitate to contact me if you have any questions. Thank you.

Respectfully submitted,

/s/ LANCE STEINHART

Lance J.M. Steinhart
Managing Attorney
Lance J.M. Steinhart, P.C.
Attorneys for Q LINK WIRELESS LLC

Attachments

cc: Issa Asad
Ryan Palmer
Jay Schwarz
Jodie Griffin
Garnet Hanly
Nathan Eagan
Christian Hoefly

¹ See *Lifeline and Link Up Reform and Modernization, et al*, WC Docket 11-42, et al., Second further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, FCC 15-71 (rel. June 22, 2015) (Second Further Notice of Proposed Rulemaking).



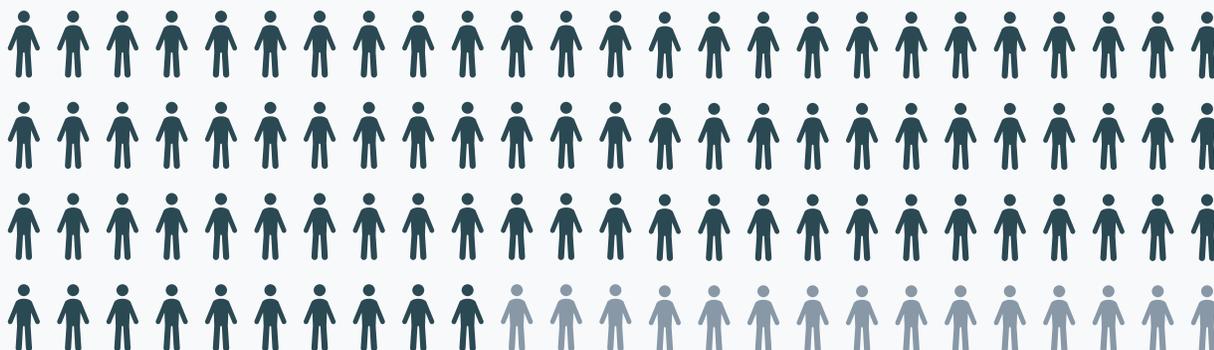


INTERNET ACCESS

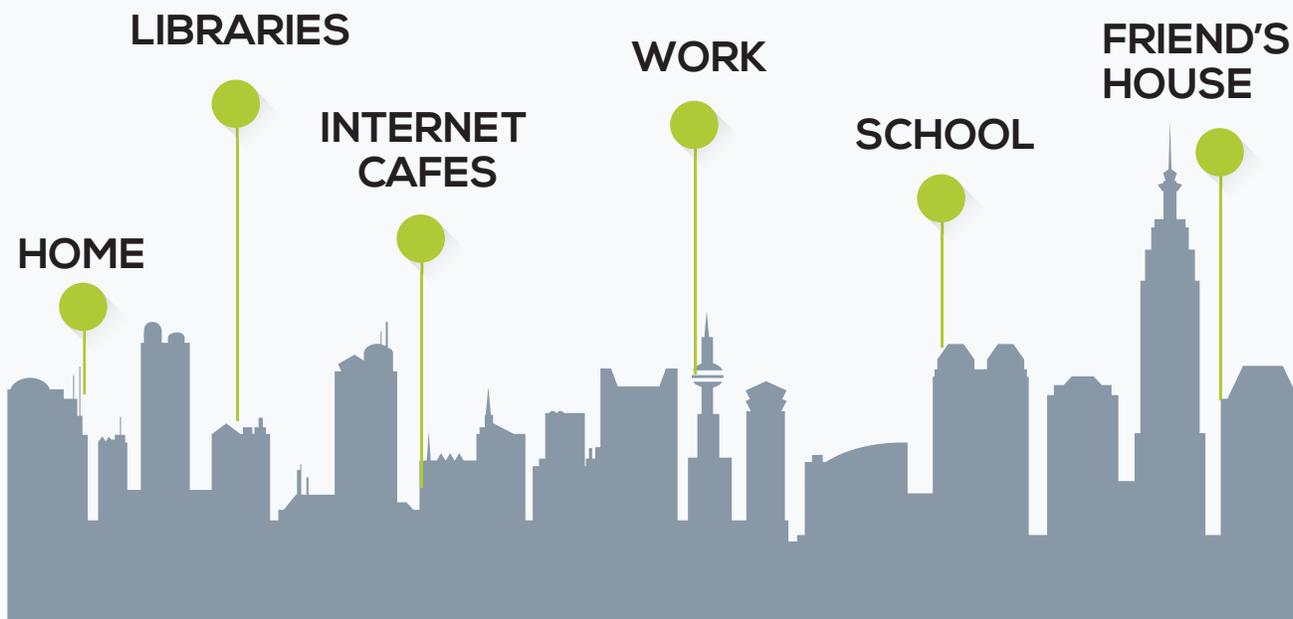
more than

85%

OF LOW INCOME FAMILIES ACCESS THE INTERNET



THIS INCLUDES ACCESSING THE INTERNET THROUGH PLACES SUCH AS:



LIFELINE OVERVIEW

-5.96% ↓

AVERAGE INCREASE IN NEW SUBSCRIBERS
in the last 15 months

36,113,041

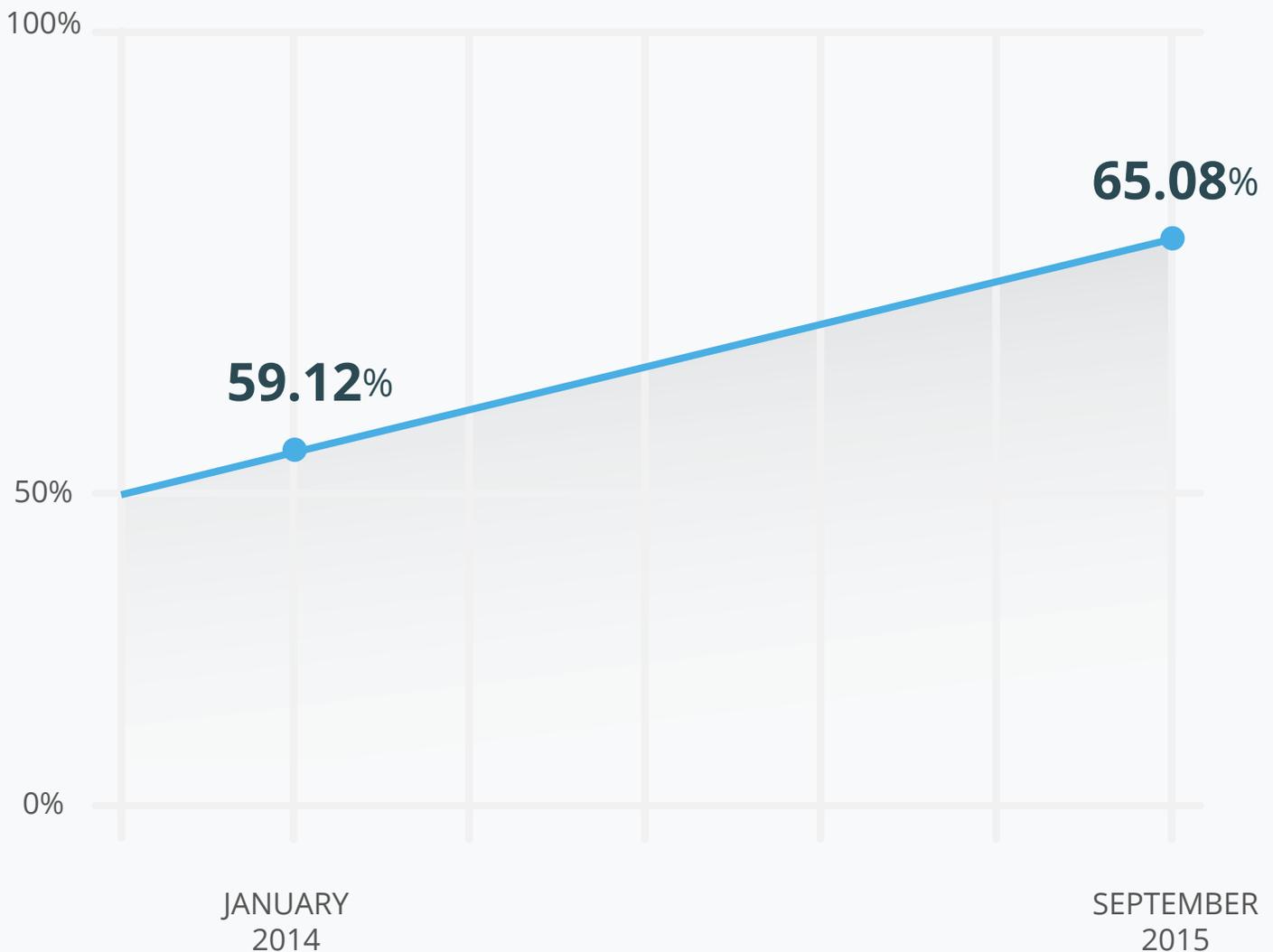
ELIGIBLE TOTAL
lifeline lines

23,501,057

UNSERVED MARKET
lifeline lines



65.08% UNSERVED LIFELINE



FEDERAL NON-JURISDICTIONAL STATES

-4.78% ↓

AVERAGE INCREASE IN NEW SUBSCRIBERS
in the last 15 months

9,708,800

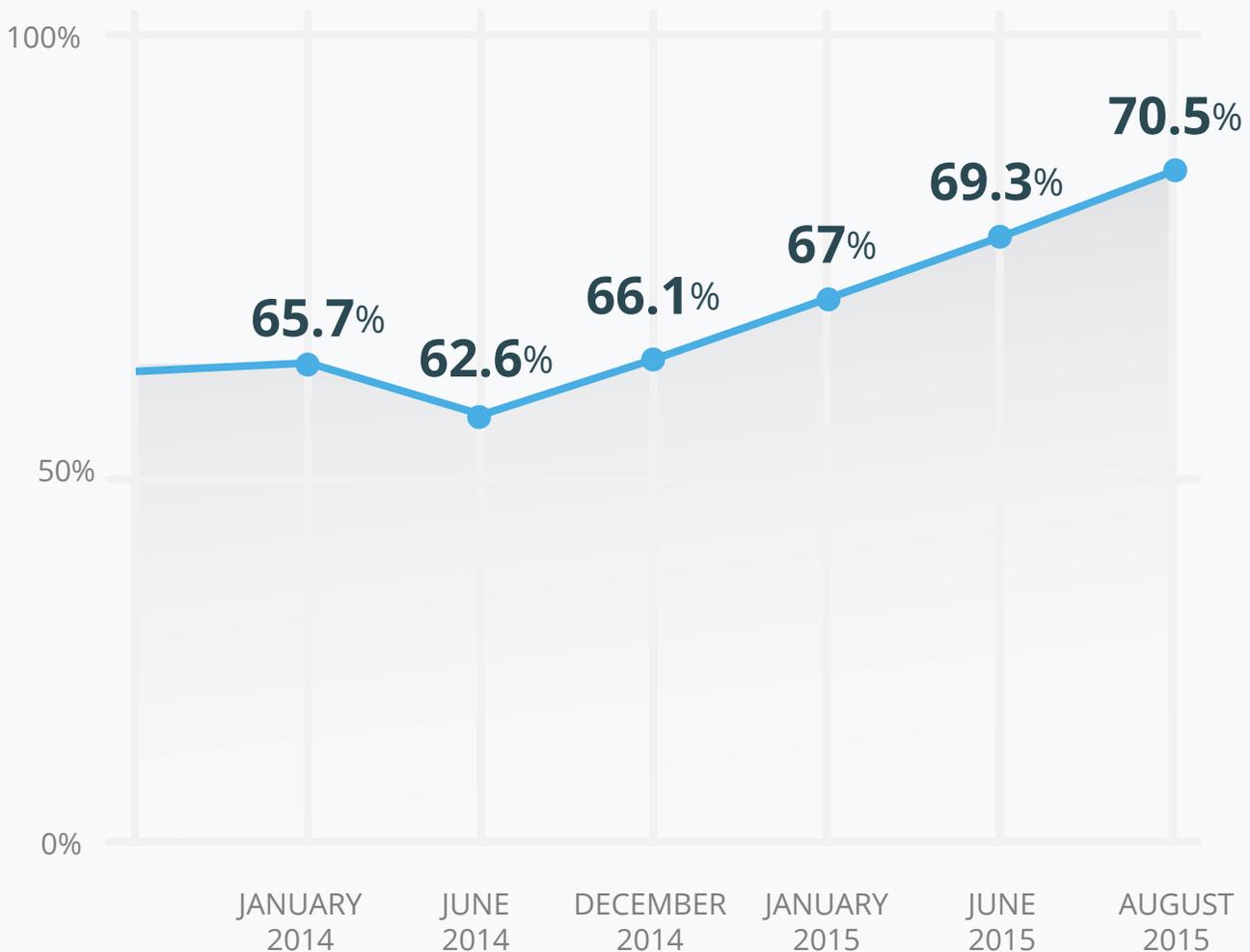
ELIGIBLE TOTAL
lifeline lines

6,844,322

UNSERVED MARKET
lifeline lines



UNSERVED LIFELINE



NEW YORK

-9.53% ↓

AVERAGE INCREASE IN NEW SUBSCRIBERS
in the last 15 months

2,675,200

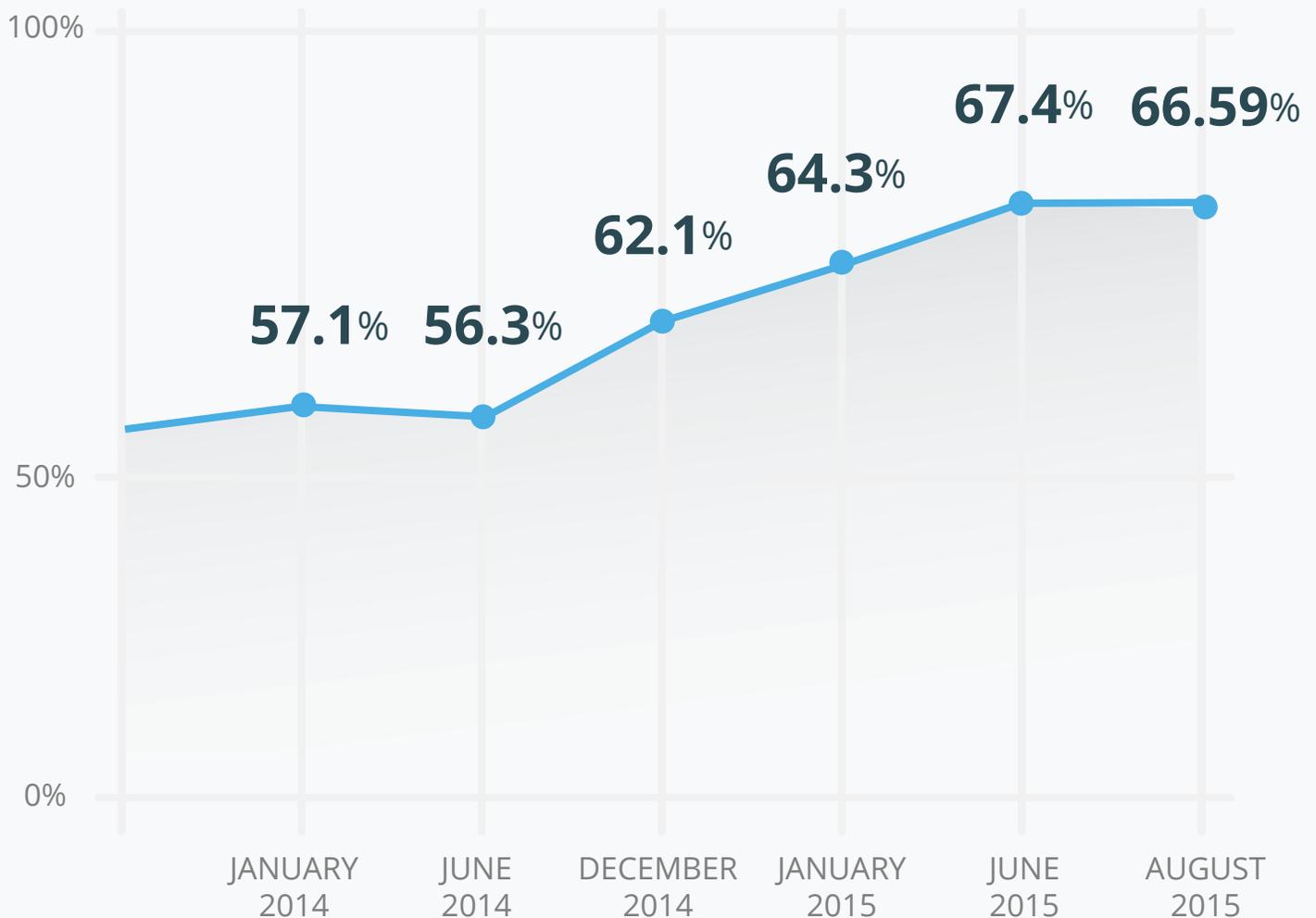
ELIGIBLE TOTAL
lifeline lines

1,781,375

UNSERVED MARKET
lifeline lines



UNSERVED LIFELINE



FLORIDA

-3.12% ↓

AVERAGE INCREASE IN NEW SUBSCRIBERS
in the last 15 months

2,880,313

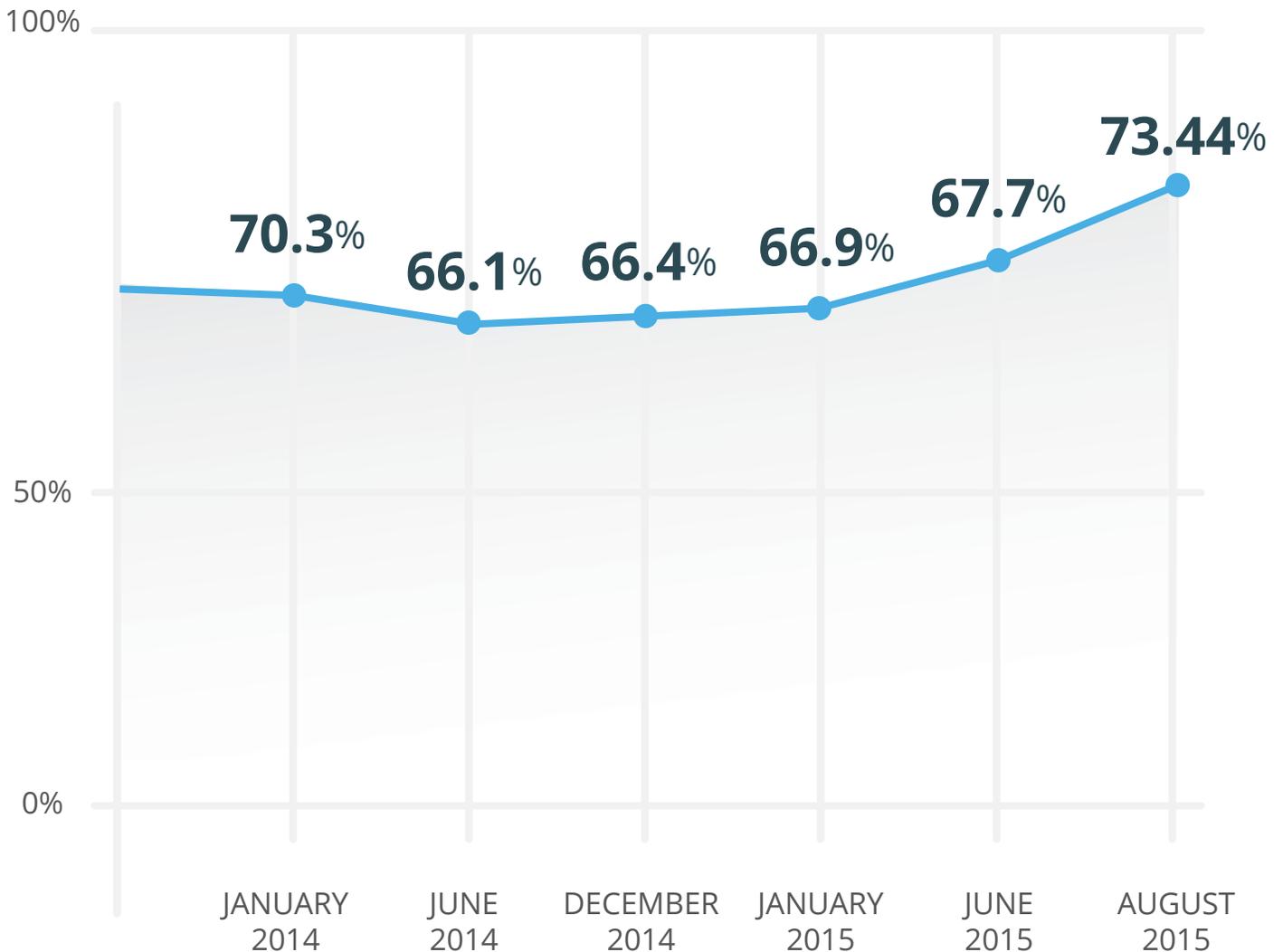
ELIGIBLE TOTAL
lifeline lines

2,115,238

UNSERVED MARKET
lifeline lines

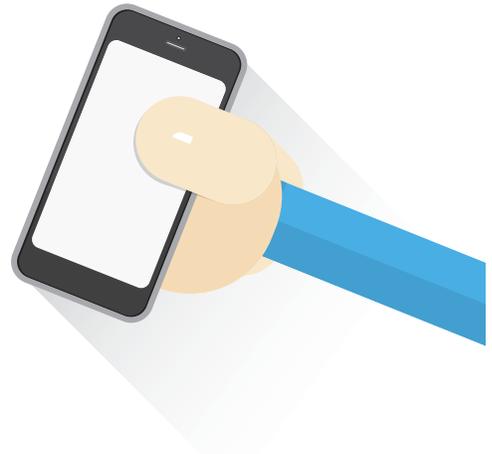


UNSERVED LIFELINE



PREPAID RATES

Q LINK WIRELESS
OFFERS BETTER RATES
THAN THE LEADING PROVIDER.



PRICE	TRACFONE SAFELINK	Q LINK WIRELESS
\$10	30 MINUTES	50 MINUTES
\$20	60 MINUTES	100 MINUTES
\$30	120 MINUTES	150 MINUTES
\$35	×	200 MINUTES
\$50	×	500 MINUTES
\$60	×	UNLIMITED

PROPOSED LIFELINE RATES

68 MINUTES FREE TO CUSTOMER	125 MINUTES FREE TO CUSTOMER	250 MINUTES FREE TO CUSTOMER
DATA-CAPABLE HANDSET	DATA-CAPABLE HANDSET	DATA-CAPABLE HANDSET
68 INTERNATIONAL MINUTES	125 ANYTIME MINUTES	250 ANYTIME MINUTES
ROLLOVER MINUTES	ROLLOVER MINUTES	NO ROLLOVER MINUTES
8 TEXTS = 1 MINUTE	8 TEXTS = 1 MINUTE	8 TEXTS = 1 MINUTE
*250 MB DATA PLAN	*250 MB DATA PLAN	*250 MB DATA PLAN

***BROADBAND FEE WAIVED FIRST 90 DAYS. THEREAFTER
250 MB DATA SERVICE FOR \$5 EVERY 90 DAYS.**

ADDITIONAL AIRTIME AVAILABLE FOR PURCHASE:

- \$5** 100 MB data for 30 service days.
- \$10** 100 minutes and 250 MB data for 30 service days.
- \$20** 500 minutes, 4,000 texts, and 20 MB data for 30 service days.
- \$30** 1,000 minutes, 8,000 texts, and 30 MB data for 30 service days.
- \$50** Unlimited minutes, unlimited texts, and 2 GB data for 30 service days.

CONFIDENTIAL

REDACTED FOR PUBLIC INSPECTION



CONFIDENTIAL

REDACTED FOR PUBLIC INSPECTION

Q VERIFY

Data Verification



Q LINK COMPLIANCE PROCESS

REDACTED FOR PUBLIC INSPECTION

