

**THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

Before Commissioners: Andrew J. French, Chairperson
 Dwight D. Keen
 Annie Kuether

In the Matter of Staff's Petition to Open a)
Docket to Write-Off the Balance on HELLO) Docket No. 26-HLMZ-097-KSF
MOBILE TELECOM, LLC's Kansas)
Universal Service Fund (KUSF) Account.)

**ORDER AUTHORIZING VANTAGE POINT SOLUTIONS TO WRITE OFF
HELLO MOBILE TELECOM, LLC'S KANSAS UNIVERSAL SERVICE FUND
BALANCE**

This matter comes before the State Corporation Commission of the State of Kansas ("Commission") for consideration and decision. Having reviewed the pleadings and record, the Commission makes the following findings:

1. Hello Mobile Telecom, LLC ("Hello Mobile") is authorized to provide cell service in Kansas. Hello Mobile has been registered with the Kansas Universal Service Fund ("KUSF") since November 2018.

2. On January 29, 2025, Vantage Point Solutions ("VPS"), the KUSF Administrator, received a letter from Inteserra indicating that it no longer represented Hello Mobile. On July 3, 2025, VPS received an undeliverable email notification in response to its delinquency notification email. Hello Mobile's FCC 499 Filer Database indicates it has not been active since January 1, 2025. Staff's September 24, 2025, R&R requests the Commission authorize the write-off of the \$124.27 on Hello Mobile's KUSF account. VPS submitted a memorandum to Commission Staff ("Staff") requesting Commission authorization to write off a balance of \$124.27 on Hello Mobile's

KUSF account.¹ VPS' memorandum described the circumstances giving rise to this request for a write-off, including that Hello Mobile no longer provides services to Kansas customers and is delinquent in submitting its March 2024 – February 2025 (FY 28) Annual True-up and its March 2025 – February 2026 (FY 29) Attachment B.² On July 28, 2023, the FCC released a Notice of Apparent Liability for Forfeiture in FCC 23-59 and proposed a \$20 million fine against Hello Mobile and Q Link. VPS' memo indicates that in October 2024 Q Link pled guilty to conspiring to defraud and commit related offenses in connection with a scheme involving the Federal Lifeline program.³

3. On September 30, 2025, Staff filed its Report and Recommendation ("R&R"), dated September 24, 2025, in the above-captioned docket, and recommended the Commission issue an order authorizing VPS to write off the \$124.27 balance on Hello Mobile's KUSF account and that VPS be required to maintain all related KUSF records in a manner that will allow VPS to track the reason for this write-off, the amount written off, and any future transactions applicable to Hello Mobile's files.⁴

4. The Commission's write-off policy, adopted June 2, 2000, allows the KUSF Administrator to write-off balances owed to the KUSF, after notification to Staff, if: (1) the balance owed to the KUSF is \$99.00 or less and the company is at least 180 days delinquent with its KUSF obligations; or (2) a balance of \$99.00 or less is owed to a company and the company is no longer operating in Kansas or the administrator does not have any current contacts for the company.⁵ For companies that meet this criteria, but have a balance exceeding the \$99.00 threshold, VPS must

¹ See Staff Exhibit 1.

² *Id.* at p. 2.

³ *Id.*

⁴ Report and Recommendation, Utilities Division, Docket No. 26-HLMZ-097-KSF (Sep. 30, 2025) ("Staff's R&R" or "R&R"), p. 2.

⁵ *Id.*, p. 1.

receive authorization to write-off the balance via a Commission order.⁶ If a final balance cannot be determined because the Company has failed to comply with all KUSF requirements or VPS or the Commission does not have any current contacts for the company, a credit balance may be retained in the Fund.⁷

5. The Commission hereby incorporates by reference the recommendations contained in Staff's R&R, as filed in the above-captioned docket on September 30, 2025.

6. The Commission finds that VPS' request for this write-off falls within the parameters of the Commission's June 2, 2000, write-off policy.

7. The Commission concludes that it is just and reasonable to authorize VPS to write off the \$124.27 balance on Hello Mobile's KUSF account.

⁶ *Id.*

⁷ *Id.*

IT IS, THEREFORE, BY THE COMMISSION ORDERED THAT:

A. Vantage Point Solutions is hereby authorized to write off the \$124.27 balance on Hello Mobile Telecom, LLC's Kansas Universal Service Fund account.

B. Vantage Point Solutions shall maintain all related KUSF records in such a manner that allows VPS to track the reason for this write-off, the amount written off, and any future transactions applicable to Hello Mobile's files.

C. Any party may file and serve a petition for reconsideration pursuant to the requirements and time limits established by K.S.A. 77-529(a)(1).⁸

BY THE COMMISSION IT IS SO ORDERED.

French, Chairperson; Keen, Commissioner; Kuether, Commissioner

Dated: 11/12/2025



Celeste Chaney-Tucker
Executive Director

BWB

⁸ K.S.A. 66-118b; K.S.A. 77-503(c); K.S.A. 77-531(b).

REPORT AND RECOMMENDATION UTILITIES DIVISION

TO: Andrew J. French, Chairperson
Dwight D. Keen, Commissioner
Annie Kuether, Commissioner

FROM: Steve Garrett, Deputy Chief of Telecommunications
Janet Buchannan, Deputy Director of Utilities
Justin Grady, Director of Utilities

DATE: September 24, 2025

SUBJECT: Docket No. 26-HLMZ-097-KSF
In the Matter of Staff's Petition to Open a Docket to Write-Off the Balance on
HELLO MOBILE TELECOM, LLC's Kansas Universal Service Fund (KUSF)
Account.

EXECUTIVE SUMMARY

On July 31, 2025, Vantage Point Solutions (VPS), the Kansas Universal Service Fund (KUSF) Administrator, submitted a memo to Commission Staff requesting Commission authorization to write-off \$124.27 on Hello Mobile Telecom, LLC's (Hello Mobile) KUSF account. VPS's Memorandum is attached to this Report and Recommendation (R&R) as Staff Exhibit 1.

Staff recommends that the Commission issue an order authorizing VPS to write-off \$124.27 on Hello Mobile's KUSF account and directing VPS to maintain all related KUSF records in a manner that will allow VPS to track the reason for the write-off, the amount written-off and any future transactions applicable to this Company's files.

BACKGROUND

The Commission's write-off policy, adopted on June 2, 2000, allows the KUSF Administrator to write-off balances owed to the KUSF, after notification to Staff, if: (1) the balance owed to the KUSF is \$99.00 or less and the company is at least 180 days delinquent with its KUSF obligations; or (2) a balance of \$99.00 or less is owed to a company and the company is no longer operating in Kansas or the administrator does not have any current contacts for the company. For companies that meet this criteria, but have a balance exceeding the \$99.00 threshold, VPS must receive authorization to write-off the balance via a Commission Order. If a final balance cannot be determined because the Company has failed to comply with all KUSF requirements or VPS or the Commission does not have any current contacts for the Company, a credit balance may be retained in the Fund.

ANALYSIS

Hello Mobile is authorized to provide cell service in Kansas. Hello Mobile has been registered with the KUSF since November 2018. It reported to the KUSF on an Annual basis from March 2019 – February 2024. It reported to the KUSF on a Semi-Annual basis from March 2021 – February 2024. It is delinquent in submitting its March 2024 – February 2025 (FY 28) Annual True-up and its March 2025 – February 2026 (FY 29) Attachment B.

On July 28, 2023 the FCC released a Notice of Apparent Liability for Forfeiture in FCC 23-59 and proposed a \$20 million fine against Q Link and Hello Mobile, which have common ownership and used the same app to provide their customers with access to Customer Proprietary Network Information (CPNI).¹ Q Link pleaded guilty to conspiring to defraud and commit related offenses in connection with a scheme involving the Federal Lifeline program in October 2024. The FCC 499 Filer Database indicates that Hello Mobile is “No longer active as of 1/1/2025. This account was inactive for an extended period and closed because the administrator could not contact the filer.” The credit balance of \$124.27 on Hello Mobile’s KUSF account is related to the March 2023 – February 2024 (FY 28_ Annual True-Up.

On January 29, 2025, VPS received a letter from Inteserra stating that it no longer represents Hello Mobile. Inteserra’s letter is attached to this R&R as Staff Exhibit 2. On July 3, 2025, VPS received an undeliverable email notification for Issa Asad, the company contact, when attempting to send a delinquent letter via email.

RECOMMENDATION

Staff recommends that the Commission issue an order authorizing VPS to write-off \$124.27 from Hello Mobile’s KUSF account and directing VPS to close the KUSF account for Hello Mobile. Staff further recommends that VPS retain the relevant KUSF records in such a manner as to track the write-off, the reason for the write-off, and any future transactions applicable to Hello Mobile’s files.

¹ <https://docs.fcc.gov/public/attachments/DOC-395581A1.pdf>



KUSF Write-Off MEMO

Date: July 31, 2025

To: Steve Garrett, Deputy Chief of Telecommunications

From: Nicole Stephens, KUSF Compliance Manager

RE: KUSF Write-Off for Hello Mobile Telecom, LLC – FY 29

BACKGROUND

This memorandum requests that the Kansas Corporation Commission (Commission) authorize Vantage Point Solutions (VPS), as the Kansas Universal Service Fund (KUSF) Administrator, to write-off a credit balance of \$124.27 on the KUSF account for Hello Mobile Telecom, LLC (f/ka Q Link Mobile) (“Hello Mobile) – KS006434.

The write-off policy adopted by the Commission on June 2, 2000, allows Vantage Point Solutions (“VPS”) to write-off certain balances, after receiving written authorization from Staff or a Commission Order. Specifically, VPS may write-off a balance with written authorization from Staff when: (1) the balance owed to the KUSF is \$99.00 or less; (2) the company is at least 180 days’ delinquent with its KUSF obligations; (3) the Company is no longer operating in Kansas or the administrator does not have any current contacts for the company. For companies meeting this criteria, but that have a balance exceeding the \$99.00 threshold, VPS must receive authorization to write-off the balance via a Commission Order.

A credit balance on a Company’s book may also be written-off using these same guidelines.

ANALYSIS

Hello Mobile has been registered with the KUSF since November 2018. It reported “Not Generating Kansas Intrastate retail revenue from March 2018 – February 2019. It reported to the KUSF on an Annual basis from March 2019 – February 2024. It is delinquent in submitting its March 2024 – February 2025 (FY 28) Annual True-up and its March 2025 – February 2026 (FY 29) Attachment B.

On January 29, 2025, the KUSF Administrator received a letter from Inteserra, the company’s third party filer, stating that it no longer represents Hello Mobile. On July 3, 2025 the KUSF Administrator received an undeliverable email notification for Issa Asad, the company contact, when attempting to send a delinquent letter via email.

On July 28, 2023 the FCC released a Notice of Apparent Liability for Forfeiture in FCC 23-59 and proposed a \$20 million fine against Q Link and Hello Mobile, which have common ownership and used the same app to provide their customers with access to CPNI. Q Link pleaded guilty to conspiring

to defraud and commit related offenses in connection with a scheme involving the Federal Lifeline program in October 2024 . The FCC 499 Filer Database indicates that Hello Mobile is “No longer active as of 1/1/2025. This account was inactive for an extended period and closed because the administrator could not contact the filer.”

The credit balance of \$124.27 on Hello Mobile’s KUSF account is related to the March 2023 – February 2024 (FY 28) Annual True-up.

RECOMMENDATION

VPS is seeking authorization to write-off and retain in the Fund the credit balance of \$124.27 and close the KUSF account for Hello Mobile. VPS will retain the KUSF records in such a manner as to track the write-off, the reason for the write-off, and any future transactions applicable to this Company’s files.

#6434



January 29, 2025
Via Email
kusf@vantagepnt.com

Kansas USF Administrator
Vantage Point Solutions
kusf@vantagepnt.com

RE: KS USF Letter of Discontinuance of Service for
HELLO MOBILE TELECOM LLC
KS USF Code KS00

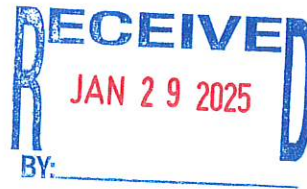
Dear Sir or Madam:

This letter is being sent to inform you HELLO MOBILE TELECOM LLC has cancelled their telecommunications Certificate of Authority. Their final date of operation was _____.

Attached is a copy of the KS Corporation Commission "Cancellation of Authority".

Questions regarding this letter should be directed to Susan Cockerham at (407) 740-8575.

Sincerely,



151 Southhall Lane, Ste. 450
Maitland, FL 32751

www.inteserra.com

January 27, 2025
Via Email
kusf@vantagepnt.com

Vantage Point Solutions
kusf@vantagepnt.com

RE: KS USF Letter of Discontinuance of Contract for
HELLO MOBILE TELECOM LLC
KS USF Code KS00 6434

Dear Sir or Madam:

This letter is being sent to inform you that HELLO MOBILE TELECOM LLC is no longer a Compliance Reporting Service client of Inteserra, Inc. Inteserra, Inc. will no longer be providing remittance for their KS USF payments.

The contact information we have for this company is:
HELLO MOBILE TELECOM LLC
Issa Asad
499E. Sheridan St., Suite 400, Dania, FL 33004
954-482-4249

Please forward all correspondence to the contact person mentioned above.

Questions regarding this letter should be directed to me at (678) 672-2837 or via email to scockerham@inteserra.com.

Sincerely,

Susan Cockerham

Susan Cockerham
Sr. Regulatory Compliance Specialist

cc: Issa Asad - HELLO MOBILE TELECOM LLC
file: HELLO MOBILE TELECOM LLC - Reporting - Kansas

CERTIFICATE OF SERVICE

26-HLMZ-097-KSF

I, the undersigned, certify that a true copy of the attached Order has been served to the following by means of electronic service on 11/12/2025.

ISSA ASAD, MANAGING MEMBER
HELLO MOBILE TELECOM, LLC
499 E. SHERIDAN STREET
SUITE 400
DANIA, FL 33004
reg@qlinkmobile.com

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KANSAS CORPORATION COMMISSION
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NICOLE STEPHENS, KUSF ADMINISTRATOR MANAGER
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/S/ KCC Docket Room
KCC Docket Room