

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Before Commissioners: Dwight D. Keen, Chair
 Shari Feist Albrecht
 Susan K. Duffy

In the Matter of the Audit of Q Link Wireless, LLC)
by the Kansas Universal Service Fund (KUSF))
Administrator Pursuant to K.S.A. 2018 Supp.) Docket No. 20-QLWZ-064-KSF
66-2010(b) for KUSF Operating Year 22, Fiscal Year)
March 2018-February 2019.)

STAFF RESPONSE TO Q LINK WIRELESS, LLC'S REQUEST
FOR ADDITIONAL TIME

COMES NOW the Commission Staff ("Staff") and for its Response to Q Link Wireless, LLC's Request for Additional Time to Answer KUSF Data Requests, states:

1. GVNW Consulting, Inc. (GVNW) is the current Administrator for the Kansas Universal Service Fund (KUSF). The KUSF Administrator has statutory responsibilities for collecting and auditing information regarding telecommunication service providers receiving funds from the KUSF.¹ It is also entrusted with the duty to verify funds generated for the KUSF.²

2. On July 25, 2019, the Commission issued an Order in Docket No. 18-GIMT-084-GIT (18-084 Docket) approving modifications to the Carrier Selection Criteria and Audit Procedures for Fiscal Year 22.³ The Order directed GVNW to file the updated Carrier Selection Criteria and Audit Procedures and provide a list of the 16 carriers to be audited for Fiscal Year 22. On July 26, 2019, GVNW responded to the Commission Order by filing the Carrier Selection Criteria and Audit Procedures along with a list of 16 carriers to be audited for Fiscal Year 22,

¹ K.S.A. 2018 Supp. 66-2010(b)(1).

² K.S.A. 2018 Supp. 66-2010(b)(2)

³ Order, Docket 18-GIMT-084-GIT, July 25, 2019.

which includes the period between March 1, 2018 and February 28, 2019.⁴ On August 8, 2019, the Commission issued an Order accepting the Audit Selections and Audit Review Procedures for Fiscal Year 22.⁵

3. On August 15, 2019, the Commission opened the above-captioned Docket and pursuant to the selection list provided by GVNW for Fiscal Year 22, issued an Order designating Q Link Wireless, LLC (Q Link) for a KUSF audit.⁶ Q Link did not object to the August 15, 2019 Audit Order in this Docket nor to the selection criteria or the Audit Procedures in the 18-084 Docket.

4. On August 15, 2019, GVNW electronically sent audit correspondence with instructions, standard data requests and confidentiality disclosures to the contact reference contained in the KUSF Administrator's records for Q Link and is provided as Attachment B to the Response.⁷ Data Requests were indicated to be due by September 5, 2019. No response to the audit correspondence was received as requested in the instructions contained in the introductory letter. GVNW then contacted an agent for Q Link with a request for a second point of contact. A second point of contact was provided on August 26, 2019, and the correspondence along with instructions, data requests and confidentiality disclosures were sent the same day with notice that the data request responses were due on September 5, 2019.

5. On September 3, 2019, GVNW followed up with its correspondence to remind Q Link that its responses to data request were due on September 5, 2019. On September 4, 2019, a

⁴ GVNW's Submission of Fiscal Year 22 (FY22) Carrier Audit Selection and Revised Audit Procedures, dated July 23, 2019.

⁵ Order Accepting GVNW's KUSF Year 22 Audit Selections and Revisions to Selection Criteria and Audit Review Procedures, Docket 18-GIMT-084-GIT, August 8, 2019.

⁶ Order to KUSF Administrator to Commence Audit, Docket No. 20-QLWZ-064-KSF, August 15, 2019.

⁷ Attachment B contains introductory correspondence, Data Request Instructions, Confidentiality standards and 16 Data Requests. Only DR No. 1 has been answered.

Regulatory Specialist for Q Link emailed GVNW to indicate Q Link would not be providing data request responses on the September 5, 2019 due date (except for Data Request 1: Point of Contact [no verification]) and would need up to October 17, 2019 to answer.⁸ The Regulatory Specialist recited other outside compliance deadlines and audits as the reason for delay, but also indicated Hurricane Dorian as a unique circumstance given the Company's Florida location in Dania Beach, Florida. In this regard, Staff notes Dania Beach was not in an area where the storm had any resulting impact and was moving toward the South Carolina coast at the time this justification was first made.

6. Because the Q Link email indicating non-compliance with the discovery deadline of September 5, 2019, GVNW continued an email string of correspondence with Q Link and its Regulatory Specialist on September 4, 2019 and advised Q Link of the Data Request (DR) procedures included as an attachment to the Audit correspondence provided to Q Link on August 15 and August 26, 2019.⁹ The Audit Procedures recite in Section III that requests for additional time may be requested for time periods not exceeding seven (7) days, if the request identifies those portions of the DRs by number and subpart that cannot be answered on time; an explanation why the DR subpart may not be answered and the additional time for response is provided.¹⁰ The procedures also permit a second seven (7) day extension period, but the request will be evaluated to determine if it should be granted or whether a formal request should be made to the Commission or a Motion to Compel should be filed.¹¹ Without complying with the DR procedures, the Q Link President responded to GVNW and the Regulatory Specialist by stating Q Link would respond by

⁸ The email string is included as Attachment A. Attachment A, page 6 of 15

⁹ See, Attachment A generally.

¹⁰ See, Kansas Universal Service Fund Carrier Audit Procedures (FY22), Docket No. 18-GIMT-084-GIT, Attachment 2, September 26, 2019.

¹¹ Id.

October 17, 2019 and would try, if possible to respond sooner, but then left the matter up in the air by stating to GVNW and the Regulatory Specialist that they could “work out the politics of it.”¹² The Staff interceded and advised Q Link in email correspondence on September 5, 2019 of the Audit Procedures for discovery and indicated that there needed to be material progress in answering the DRs in conjunction with the two (2) seven day extension periods, but if the schedule was not achievable and answers could not be provided on time, a request would need to be made to the Commission for any extension not covered by the Audit Procedures.¹³ On September 9, 2019, Q Link through its Regulatory Specialist made its first request for an extension of time (out of time) through correspondence filed with the Commission in letter form, reiterating its claimed reasons for more time as a result of personnel, other reporting and compliance deadlines and other audits and Hurricane Dorian.¹⁴ The letter advised it would need fourteen days to respond to DRs 13, 14 and 15 and would need until October 17, 2019 for DRs 2 through 12 and 16.¹⁵

7. Staff respectfully requests the Commission deny the request for extension and direct Q Link to file responses immediately, given the time that has elapsed by the date this matter is decided and failure to comply with the Data Request instructions embodied within the Audit Procedures approved by the Commission on August 8, 2019 in the 18-084 Docket and reiterated in the correspondence sent to Q Link on August 15 and 26, 2019 and its DR instructions. The Staff also notes the need for timely responses given the audit deadline of June 30, 2020 in this docket and other audits established in the 18-084 Docket and the fact that Q Link has provided no information beside the point of contact DR No. 1, with the DRs being standard requests for information, where much, if not all, the information should be readily available for submission.

¹² Attachment A, page 5 of 15.

¹³ Attachment A, page 10 of 15.

¹⁴ Q Link Wireless LLC Request for Additional Time, Docket No. 20-QLWZ-064-KSF, September 9, 2019.

¹⁵ Id.

8. The Audit Procedures approved by the Commission in the 18-084 Docket provide:

Extensions of Time: the DR process Information (Initial Audit Packet - Attachment A) must advise that if requested information cannot be provided by the due date, the Company must request, in writing, an extension from the auditor. The request for extension must include: identification of information that cannot be provided, an explanation of why the information cannot be provided, and the additional number of days the Company is seeking an extension for. An Extension of Time should not exceed seven (7) business days. The Company must be advised that if it fails to meet the due date and does not request a second Extension of Time, the auditor may file a Motion to Compel with the Commission.

Note: *No more than two (2) extensions should be provided, absent approval from Commission Staff and/or the Commission.*

The Audit Procedures are further amplified in the Audit Packet submitted in the correspondence sent to Q Link on August 15 and 26, 2019 and appear as follows:

III. Requests for Additional Time

If your Company cannot provide a response to any DR or subpart by the due date, your Company must submit a written Request for Additional Time prior to the due date. A Request for Additional Time must include: (1) identification of information that cannot be provided, by DR number and subpart; (2) an explanation of why the information cannot be provided by the due date; and (3) the additional number of days the Company is seeking in which to provide the response.

GVNW will provide a written response to the Request. If the Request for Additional Time is granted GVNW will provide, in writing, the revised due date (not to exceed seven (7) business days). If a second Request for Additional Time is necessary, your Company must submit a second Request for Additional Time to GVNW. A second (and any subsequent) Request for Additional Time will be reviewed to determine whether: (1) additional time will be informally granted; (2) the Company should formally file a Request with the Commission; or (3) GVNW will file a Motion to Compel, with GVNW providing a written notification of the review.

9. The Commission is respectfully requested to deny the request for an extension of time for several reasons. First, Q Link has not complied with the Audit Procedures for the request for extension of the discovery deadline prior to the answer date of September 5, 2019 by making an initial request of seven (7) days broken down for each DR subpart where more time is needed. Additionally, a second request for a seven (7) extension was not made. This failure has resulted

in Q Link having to file an extraordinary extension request with the Commission after the discovery deadline has expired. On September 9, 2019, Q Link through a Regulatory Specialist filed a request citing personnel, other regulatory deadlines and audits and Hurricane Dorian. The Staff submits the request should not be granted inasmuch as Q Link has not made a good faith effort to provide any of the information requested in the 16 DRS submitted, except the point of contact information.

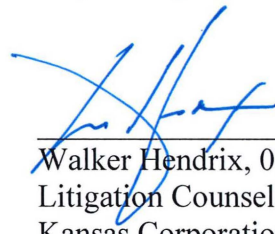
10. Secondly, Q Link may not use its other regulatory commitments and audits as a basis for extension. There is no reason Q Link can *ipso facto* declare a timeline convenient to itself without regard to the Commission and GVNW's responsibilities. The information requests are not unreasonably burdensome and are standard for all audits GVNW conducts for the KUSF. GVNW has its own timeline for completing the audits and Q Link is merely being dilatory. Moreover, Q Link makes this request without attempting to provide material information in response to any of the DRs, except the point of contact information, or attempting to make a request within the timelines provided by the Audit Procedures. Q Link simply cannot forestall the audit because it does not regard it to be conducted at a convenient time for it. If convenience were a valid excuse for responding to the Commission, its work would never get done. This is not a simple matter as characterized by Q Link's President has indicated of "working out the politics" of the discovery process and postponing discovery at Q Link's unilateral insistence.

11. Thirdly, Hurricane Dorian does not provide an adequate basis for the relief sought by Q Link. By the time Q Link made its request for an extension of time Dorian had left the North American continent. Moreover, it had little or no effect on South Florida. Even assuming *arguendo* the Hurricane was a factor, there is no basis for requesting a six weeks to respond to the balance of the DRs submitted to Q Link. Because Q Link has not made a good faith effort to

comply with the Audit Procedures and to provide any accounting information, the excuse of a storm that has already passed does not give rise to a six week extension.

WHEREFORE, for the reasons stated above, Staff respectfully requests the Commission deny Q Link's request for extension embodied in its correspondence filing of September 9, 2019.

Respectfully Submitted,

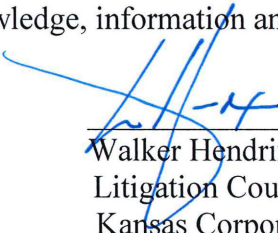


Walker Hendrix, 08835
Litigation Counsel
Kansas Corporation Commission
1500 S.W. Arrowhead Road
Topeka, Kansas 66604-4027
Phone: 785-271-3157
Fax: 785-271-3167

STATE OF KANSAS)
) ss.
COUNTY OF SHAWNEE)

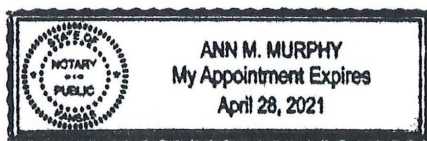
VERIFICATION

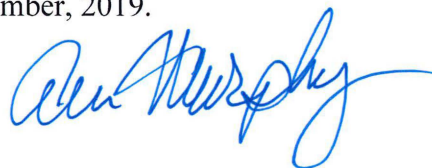
Walker Hendrix, being duly sworn upon his oath deposes and states that he is a Litigation Counsel for Litigation Counsel of the Kansas Corporation Commission of the State of Kansas, that he has read and is familiar with the foregoing *Response*, and attests that the statements contained therein are true and correct to the best of his knowledge, information and belief.



Walker Hendrix, 08835
Litigation Counsel
Kansas Corporation Commission

Subscribed and sworn to before me this 18 day of September, 2019.





ATTACHMENT A

Dennis C. Smith

From: Susan Cockerham <scockerham@fastekteam.com>
Sent: Monday, August 26, 2019 1:22 PM
To: Dennis C. Smith
Cc: Dawn Cartellone
Subject: [EXTERNAL] RE: Kansas Universal Service Fund Audit - Q Link Wireless, LLC (6327)

That is the email I have on file in addition to maybell@qlinkwireless.com.
You can try that one.

*Susan Cockerham
Senior Manager, Regulatory Operations
FAS Tek Compliance Solutions
Direct Dial: (678) 672-2837
Office Phone: (678) 672-2800 Ext. 2115
Fax Number: (678) 672-2830
scockerham@fastekteam.com*



From: Dennis C. Smith <dsmith@gvnw.com>
Sent: Monday, August 26, 2019 2:16 PM
To: Susan Cockerham <scockerham@fastekteam.com>
Cc: Dawn Cartellone <dcartellone@gvnw.com>
Subject: Kansas Universal Service Fund Audit - Q Link Wireless, LLC (6327)

Good morning, Susan,

Q Link Wireless, LLC has been selected for a Kansas USF audit. Previous attempts to reach the company at the email address on file (reg@qlinkwireless.com) have yielded no response from the company. A copy of the Order has been attached. GVNW still requires a Point of Contact (POC) be designated in order to submit the Initial Audit Packet to the Company (see attached email).

As your email address is listed as an agent of Q Link, can you help facilitate this process to gain a response from the company?

Thank you,

- Dennis

Dennis C. Smith | GVNW Consulting, Inc.
2930 Montvale Drive | Suite B | Springfield, IL 62704
Direct 217.862.1938 | Office 217.698.2700
www.gvnw.com | dsmith@gvnw.com



Dennis C. Smith

From: Dawn Cartellone
Sent: Tuesday, September 3, 2019 9:43 AM
To: 'reg@qlinkwireless.com'; 'maybell@qlinkwireless.com'
Cc: Dennis C. Smith
Subject: Kansas USF FY22 audit of Q Link Wireless
Attachments: Qlink FY22 Initial Audit Packet 2019-08-26.pdf; KUSF - FY 22 DR No. 3 Revenue Template.xls

This is a friendly reminder that your Kansas USF FY 22 responses for Q Link Wireless are due to GVNW by Thursday, September 5, 2019.

Thanks,

Dawn Cartellone

Administrative Manager
GVNW Consulting, Inc.
2270 La Montana Way, #100
Colorado Springs, CO 80918
719-594-5800
www.gvnw.com

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Dennis C. Smith

From: Heather Kirby <hkirby@telecomcounsel.com>
Sent: Wednesday, September 4, 2019 3:15 PM
To: Dennis C. Smith; Dawn Cartellone
Cc: Maybell Kelly; reg
Subject: [EXTERNAL] RE: Kansas USF FY22 audit of Q Link Wireless

Dennis and Dawn,

Due to multiple external factors, Q Link will respond to the KUSF Operating Year 22 data requests on or before 10/17/19. Please note that Q Link has already provided a response to DR #1.

The Company has other outside compliance deadlines requiring attention of its personnel, including national verifier transition deadlines and ongoing USAC audits. Further, Q Link is headquartered in Florida and was thus uniquely affected by hurricane Dorian.

Thank you,

Heather Kirby
Regulatory Specialist
Lance J.M. Steinhart, P.C.
Attorneys at Law
1725 Windward Concourse
Suite 150
Alpharetta, GA 30005
(678) 237-5372 (Phone)
(678) 775-1196 (Fax)
e-mail: hkirby@telecomcounsel.com
www.telecomcounsel.com

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From: Maybell Kelly <Maybell@qlinkwireless.com>
Sent: Tuesday, September 03, 2019 10:45 AM
To: Heather Kirby <hkirby@telecomcounsel.com>
Subject: FW: Kansas USF FY22 audit of Q Link Wireless

Maybell Kelly
Compliance Director



499 E SHERIDAN ST, STE 400
DANIA, FLORIDA 33004

Office: 954.482.4253
Email: Maybell@qlinkwireless.com
Web: www.Qlinkwireless.com

From: Dawn Cartellone <>
Sent: Tuesday, September 3, 2019 10:43 AM
To: reg <reg@qlinkwireless.com>; Maybell Kelly <Maybell@qlinkwireless.com>
Cc: Dennis C. Smith <dsmith@gvnw.com>
Subject: Kansas USF FY22 audit of Q Link Wireless

This is a friendly reminder that your Kansas USF FY 22 responses for Q Link Wireless are due to GVNW by Thursday, September 5, 2019.

Thanks,

Dawn Cartellone

Administrative Manager
GVNW Consulting, Inc.
2270 La Montana Way, #100
Colorado Springs, CO 80918
719-594-5800
www.gvnw.com

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Dennis C. Smith

From: Issa Asad <Issa@quadrantholdings.com>
Sent: Thursday, September 5, 2019 7:51 AM
To: Heather Kirby
Cc: Dennis C. Smith; Dawn Cartellone; Maybell Kelly; reg
Subject: [EXTERNAL] Re: Kansas USF FY22 audit of Q Link Wireless

Dennis and Heather
We will respond 10/17/2019
We will try sooner if possible but that's it. You guys can work out the politics of it

Issa Asad
CEO
QUADRANT HOLDINGS LLC
499 E. Sheridan Street Ste. 400
Dania Beach, Florida 33004
Mobile: 305.915.9600
Work: 954.482.4255
Fax: 305.402.0224
Issa@QuadrantHoldings.com

iPhone pardon spelling errors !!

On Sep 5, 2019, at 8:32 AM, Heather Kirby <hkirby@telecomcounsel.com> wrote:

Thank you, Dennis.

Heather Kirby
Regulatory Specialist
Lance J.M. Steinhart, P.C.
Attorneys at Law
1725 Windward Concourse
Suite 150
Alpharetta, GA 30005
(678) 237-5372 (Phone)
(678) 775-1196 (Fax)
e-mail: hkirby@telecomcounsel.com
www.telecomcounsel.com

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From: Dennis C. Smith <dsmith@gvnw.com>
Sent: Wednesday, September 04, 2019 4:30 PM
To: Heather Kirby <hkirby@telecomcounsel.com>; Dawn Cartellone <dcartellone@gvnw.com>
Cc: Maybell Kelly <Maybell@qlinkwireless.com>; reg <reg@qlinkwireless.com>
Subject: RE: Kansas USF FY22 audit of Q Link Wireless

Good afternoon, Heather,

Instructions on submitting a Request for Additional Time can be found in the Initial Audit Packet's Attachment A (attached). Specifically, a Request for Additional Time must contain the following:

1. DRs, by number, that cannot be provided by the due date (in this case, DRs 1-16),
2. The reason the additional time is being requested (which has been provided), and
3. The number of days requested (which has been provided).

Such a request can be made via email, as long as it is clearly identified as a Request for Additional Time – and- all three (3) criteria (above) are met.

GVNW is authorized to approve requests for additional time up to (but not greater than) seven (7) days. Requests in excess of 7 days will be forwarded to KCC Staff for consideration.

Additionally, it should be noted that a signed response to Data Request No. 1 has not been returned to GVNW.

I have attached a copy of the Initial Audit Request's Attachment A for reference. Section III, specifically, deals with Requests for Additional Time.

Let me know if you have further questions.

Dennis C. Smith | GVNW Consulting, Inc.
2930 Montvale Drive | Suite B | Springfield, IL 62704
Direct 217.862.1938 | Office 217.698.2700
www.gvnw.com | dsmith@gvnw.com

<image001.png>

From: Heather Kirby <hkirby@telecomcounsel.com>
Sent: Wednesday, September 4, 2019 3:15 PM
To: Dennis C. Smith <dsmith@gvnw.com>; Dawn Cartellone <dcartellone@gvnw.com>
Cc: Maybell Kelly <Maybell@qlinkwireless.com>; reg <reg@qlinkwireless.com>
Subject: [EXTERNAL] RE: Kansas USF FY22 audit of Q Link Wireless

Dennis and Dawn,

Due to multiple external factors, Q Link will respond to the KUSF Operating Year 22 data requests on or before 10/17/19. Please note that Q Link has already provided a response to DR #1.

The Company has other outside compliance deadlines requiring attention of its personnel, including national verifier transition deadlines and ongoing USAC audits. Further, Q Link is headquartered in Florida and was thus uniquely affected by hurricane Dorian.

Thank you,

Dennis C. Smith

From: Sandy Reams <s.reams@kcc.ks.gov>
Sent: Thursday, September 5, 2019 1:29 PM
To: Dennis C. Smith
Cc: Dawn Cartellone
Subject: [EXTERNAL] RE: Kansas USF FY22 audit of Q Link Wireless

Thank you, Dennis.

I will chat with Christine about this and get back to you.

From: Dennis C. Smith <dsmith@gvnw.com>
Sent: Thursday, September 5, 2019 8:21 AM
To: Sandy Reams <s.reams@kcc.ks.gov>
Cc: Dawn Cartellone <dcartellone@gvnw.com>
Subject: RE: Kansas USF FY22 audit of Q Link Wireless

This is an EXTERNAL EMAIL. Think before clicking a link or opening attachments.

Good morning, Sandy,

I wanted to give you a heads up on the following:

- GVNW sent a reminder to Q Link Wireless on 9/3/2019 that their DR Responses were due on 9/5/2019.
- Q Link responded that they would submit their DR Responses on or before 10/17/2019.
- GVNW responded regarding the appropriate submission of a Request for Additional Time.
- Q Link's CEO responded with the following:
 - "We will respond 10/17/2019
We will try sooner if possible but that's it. You guys can work out the politics of it"
- Q Link did not submit a Request for Additional Time

It is possible that Q Link's POC/agent will submit a Request for Additional Time today, though the 10/17/19 date is over a month away and it *appears* that the company is not willing to provide *any* information prior to that date.

All the relevant correspondence is in this email thread. My understanding is that, after the midnight deadline on 9/5/2019, there will be a Motion to Compel. This will be my first time going through this process, so I wanted us all to be aware of what's coming so the process may go smoothly.

I'll be out of the office today, but we can talk more about this item tomorrow or next week (whichever is more convenient).

Thank you.

Dennis C. Smith | GVNW Consulting, Inc.
2930 Montvale Drive | Suite B | Springfield, IL 62704
Direct 217.862.1938 | Office 217.698.2700
www.gvnw.com | dsmith@gvnw.com

Dennis C. Smith





From: Dawn Cartellone
Sent: Monday, September 9, 2019 9:12 AM
To: Dennis C. Smith
Subject: QLink

Follow Up Flag: Follow up
Flag Status: Completed

Dennis,

Good morning. As of this morning QLink has not yet filed an extension with the KCC. Per Sandy's email from last week, I'd say they are now officially late. Not sure if you want to contact Sandy about us now filing a Motion to Compel

Dawn

	Document Type	Description	Da
	Order	Order to KUSF Administrator to Commence Audit of Q Link Wireless, LLC and Order Setting Procedure Schedule Files: 	8/1
	Order	Order Assessing Costs Files: 	8/2

<http://estar.kcc.ks.gov/estar/portal/kscc/page/docket-docs/PSC/DocketDetails.aspx?DocketId=1d65145d-2f6c-49d6-913b-ee2aad5237b2>

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Dennis C. Smith

From: Heather Kirby <hkirby@telecomcounsel.com>
Sent: Monday, September 9, 2019 4:08 PM
To: Christine Aarnes; Sandy Reams; Maybell@qlinkwireless.com
Cc: Dennis C. Smith
Subject: [EXTERNAL] RE: Kansas USF Audit, Data Request Responses
Attachments: KS Qlink Audit Extension Request (refile) 9.9.19.pdf

I just filed the attached request and will serve it on the service list. I'll advise once I know if it was accepted/rejected.

Thank you,

Heather Kirby
Regulatory Specialist
Lance J.M. Steinhart, P.C.
Attorneys at Law
1725 Windward Concourse
Suite 150
Alpharetta, GA 30005
(678) 237-5372 (Phone)
(678) 775-1196 (Fax)
e-mail: hkirby@telecomcounsel.com
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From: Christine Aarnes <c.aarnes@kcc.ks.gov>
Sent: Monday, September 09, 2019 11:32 AM
To: Heather Kirby <hkirby@telecomcounsel.com>; Sandy Reams <s.reams@kcc.ks.gov>; Maybell@qlinkwireless.com
Cc: Dennis C. Smith <dsmith@gvnw.com>
Subject: RE: Kansas USF Audit, Data Request Responses

Thank you for letting us know, Heather. Please let us know once you have re-filed and it has been accepted.

Christine

From: Heather Kirby <hkirby@telecomcounsel.com>
Sent: Monday, September 9, 2019 9:37 AM
To: Sandy Reams <s.reams@kcc.ks.gov>; Maybell@qlinkwireless.com
Cc: Dennis C. Smith <dsmith@gvnw.com>; Christine Aarnes <c.aarnes@kcc.ks.gov>
Subject: RE: Kansas USF Audit, Data Request Responses

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All,

I have attached an email from Friday 9/6 where I attempted to contact Sandy, but I received an out of office (I also left a voicemail).

After speaking with Dennis on Friday, I e-filed the attached extension request, but just received a rejection notice today because the filing did not include a certificate of service.

I will re-file today with a certificate of service, but wanted to make sure you were aware of our attempts to comply with the procedures requested.

Thank you,

Heather Kirby
Regulatory Specialist
Lance J.M. Steinhart, P.C.
Attorneys at Law
1725 Windward Concourse
Suite 150
Alpharetta, GA 30005
(678) 237-5372 (Phone)
(678) 775-1196 (Fax)
e-mail: hkirby@telecomcounsel.com
www.telecomcounsel.com

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From: Sandy Reams <s.reams@kcc.ks.gov>
Sent: Thursday, September 05, 2019 5:08 PM
To: Heather Kirby <hkirby@telecomcounsel.com>; Maybell@qlinkwireless.com
Cc: Dennis C. Smith <dsmith@gvnw.com>; Christine Aarnes <c.aarnes@kcc.ks.gov>
Subject: Kansas USF Audit, Data Request Responses

Good afternoon. Dennis Smith, GVNW Consulting, Inc.'s (GVNW) auditor has advised the Kansas Corporation Commission Staff (KCC and Staff, respectively) that due to other regulatory and/or compliance matters, Q Link Wireless will respond to GVNW's audit responses by 10/17/19. As Mr. Smith has advised, the Company is authorized to seek a 7-day extension of time and may file two such requests with GVNW. Given the Company's statements, the Company should identify those responses it can provide during a 7-day extension, those it can provide within a total of 14 days, and those it cannot provide within the 14 day extended period.

As the original due date is today, September 5, 2019, any 7 or 14 day requests for an extension of time should be submitted to GVNW today. Alternatively, if the Company believes it cannot provide any information prior to October 17th, it needs to file a request with the Commission seeking such an extension. That request should also be filed with the KCC today. A filing may be made until 11:59 p.m. using the KCC's efile system, however, Staff understands if a filing with the KCC cannot be submitted until tomorrow.

Please let us know if you have any further questions.

Dennis C. Smith

From: Heather Kirby <hkirby@telecomcounsel.com>
Sent: Monday, September 9, 2019 4:08 PM
To: Dennis C. Smith; Christine Aarnes; Sandy Reams; Maybell@qlinkwireless.com
Subject: [EXTERNAL] RE: Kansas USF Audit, Data Request Responses
Attachments: Qlink DR1_Signed.pdf

I have attached a signed version of DR1 with the same information that was provided via email on 8/26/19.

Thank you!

Heather Kirby
Regulatory Specialist
Lance J.M. Steinhart, P.C.
Attorneys at Law
1725 Windward Concourse
Suite 150
Alpharetta, GA 30005
(678) 237-5372 (Phone)
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From: Dennis C. Smith <dsmith@gvnw.com>
Sent: Monday, September 09, 2019 11:35 AM
To: Christine Aarnes <c.aarnes@kcc.ks.gov>; Heather Kirby <hkirby@telecomcounsel.com>; Sandy Reams <s.reams@kcc.ks.gov>; Maybell@qlinkwireless.com
Subject: RE: Kansas USF Audit, Data Request Responses

Heather,

Please note that DR No. 1 has not been responded to, and needs to either be returned or included in the Request for Additional Time.

Dennis C. Smith | GVNW Consulting, Inc.
2930 Montvale Drive | Suite B | Springfield, IL 62704
Direct 217.862.1938 | Office 217.698.2700
www.gvnw.com | dsmith@gvnw.com



Dennis C. Smith

From: Heather Kirby <hkirby@telecomcounsel.com>
Sent: Monday, September 9, 2019 4:11 PM
To: Dennis C. Smith; Judi Ushio; Nicole Stephens; w.hendrix@kcc.ks.gov; legal@qlinkwireless.com
Subject: [EXTERNAL] Service of document: 20-QLWZ-064-KSF
Attachments: KS Qlink Audit Extension Request (refile) 9.9.19.pdf

Attached please find a copy of Q LINK WIRELESS LLC's Request for Additional Time.

Regards,

Heather Kirby
Regulatory Specialist
Lance J.M. Steinhart, P.C.
Attorneys at Law
1725 Windward Concourse
Suite 150
Alpharetta, GA 30005
(678) 237-5372 (Phone)
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Dennis C. Smith

From: Heather Kirby <hkirby@telecomcounsel.com>
Sent: Tuesday, September 10, 2019 8:47 AM
To: Christine Aarnes; Sandy Reams; Maybell@qlinkwireless.com
Cc: Dennis C. Smith
Subject: [EXTERNAL] RE: Kansas USF Audit, Data Request Responses
Attachments: FW: KCC E-Filing Filing Accepted

Follow Up Flag: Follow up
Flag Status: Completed

FYI, yesterday's filing was accepted.

Thanks!

Heather Kirby
Regulatory Specialist
Lance J.M. Steinhart, P.C.
Attorneys at Law
1725 Windward Concourse
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Alpharetta, GA 30005
(678) 237-5372 (Phone)
(678) 775-1196 (Fax)
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From: Heather Kirby
Sent: Monday, September 09, 2019 5:08 PM
To: Christine Aarnes <c.aarnes@kcc.ks.gov>; Sandy Reams <s.reams@kcc.ks.gov>; Maybell@qlinkwireless.com
Cc: Dennis C. Smith <dsmith@gvnw.com>
Subject: RE: Kansas USF Audit, Data Request Responses

I just filed the attached request and will serve it on the service list. I'll advise once I know if it was accepted/rejected.

Thank you,

Heather Kirby
Regulatory Specialist
Lance J.M. Steinhart, P.C.
Attorneys at Law
1725 Windward Concourse
Suite 150
Alpharetta, GA 30005

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From: Christine Aarnes <c.aarnes@kcc.ks.gov>
Sent: Monday, September 09, 2019 11:32 AM
To: Heather Kirby <hkirby@telecomcounsel.com>; Sandy Reams <s.reams@kcc.ks.gov>; Maybell@qlinkwireless.com
Cc: Dennis C. Smith <dsmith@gvnw.com>
Subject: RE: Kansas USF Audit, Data Request Responses

Thank you for letting us know, Heather. Please let us know once you have re-filed and it has been accepted.

Christine

From: Heather Kirby <hkirby@telecomcounsel.com>
Sent: Monday, September 9, 2019 9:37 AM
To: Sandy Reams <s.reams@kcc.ks.gov>; Maybell@qlinkwireless.com
Cc: Dennis C. Smith <dsmith@gvnw.com>; Christine Aarnes <c.aarnes@kcc.ks.gov>
Subject: RE: Kansas USF Audit, Data Request Responses

This is an EXTERNAL EMAIL. Think before clicking a link or opening attachments.

All,

I have attached an email from Friday 9/6 where I attempted to contact Sandy, but I received an out of office (I also left a voicemail).

After speaking with Dennis on Friday, I e-filed the attached extension request, but just received a rejection notice today because the filing did not include a certificate of service.

I will re-file today with a certificate of service, but wanted to make sure you were aware of our attempts to comply with the procedures requested.

Thank you,

Heather Kirby
Regulatory Specialist
Lance J.M. Steinhart, P.C.
Attorneys at Law
1725 Windward Concourse
Suite 150
Alpharetta, GA 30005

Dennis C. Smith

From: Heather Kirby <hkirby@telecomcounsel.com>
Sent: Thursday, September 12, 2019 11:58 AM
To: Dennis C. Smith; Christine Aarnes; Sandy Reams; Maybell@qlinkwireless.com
Cc: Dawn Cartellone
Subject: [EXTERNAL] RE: Kansas USF Audit, Data Request Responses
Attachments: Qlink DR1_Signed (updated 9.12.19).pdf

Please see attached, per request.

Thank you,

Heather Kirby
Regulatory Specialist
Lance J.M. Steinhart, P.C.
Attorneys at Law
1725 Woodward Concourse
Suite 150
Alpharetta, GA 30005
(678) 237-5372 (Phone)
(678) 775-1196 (Fax)
e-mail: hkirby@telecomcounsel.com
www.telecomcounsel.com

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From: Dennis C. Smith <dsmith@gvnw.com>
Sent: Wednesday, September 11, 2019 12:45 PM
To: Heather Kirby <hkirby@telecomcounsel.com>; Christine Aarnes <c.aarnes@kcc.ks.gov>; Sandy Reams <s.reams@kcc.ks.gov>; Maybell@qlinkwireless.com
Cc: Dawn Cartellone <dcartellone@gvnw.com>
Subject: RE: Kansas USF Audit, Data Request Responses

Good morning, Heather,

We are requesting Q Link revises DR No. 1 so you are included as a Point of Contact.

Let me know if there are any issues with this.

Thank you.

Dennis C. Smith | GVNW Consulting, Inc.
2930 Montvale Drive | Suite B | Springfield, IL 62704
Direct 217.862.1938 | Office 217.698.2700
www.gvnw.com | dsmith@gvnw.com

ATTACHMENT B



GVNW CONSULTING, INC.

2270 LA MONTANA WAY #100
COLORADO SPRINGS, CO 80918
TEL. 719.594.5800
www.gvnw.com

August 2, 2019

Issa Asad
Maybell Kelly
Q Link Wireless, LLC
499 E Sheridan St., Ste.400
Dania, FL 33004

Via email reg@qlinkwireless.com
Maybebl@qlinkwireless.com:

RE: Docket No. 20-QLWZ-064-KSF (Company Code KS006327)
In the Matter of the Audit of Q Link Wireless, LLC by the Kansas Universal Service Fund (KUSF) Administrator Pursuant to K.S.A. 66-2010(b) for KUSF Operating Year 22, Fiscal Year March 2018 - February 2019.

Dear Issa and Maybell:

GVNW Consulting, Inc. (GVNW), the third-party administrator of the Kansas Universal Service Fund (KUSF), has been directed by the Kansas Corporation Commission (KCC or Commission) to conduct an audit of your Company for KUSF purposes.

Kansas Statute, K.S.A. 66-2010(b), requires the KUSF Administrator to collect and audit all information relevant to the KUSF. On August 15, 2019, the Commission determined GVNW is to perform an audit of your Company to ensure that the revenues reported, assessments paid, and the assessments collected from your customers, if applicable, are accurate.¹ In addition, GVNW is to ensure that any Lifeline reimbursements requested, if applicable, are also accurate. GVNW must submit its Audit Report to the KCC by June 30, 2020.

GVNW's auditors will examine the data your Company reported for KUSF purposes for the period of March 1, 2018, through February 28, 2019, based on a review of data for the following three (3) months:

April	2018
May	2018
January	2019

The auditor may expand the audit and request additional information and/or perform additional audit procedures, if deemed necessary by the auditor.

¹ Order Accepting GVNW'S KUSF Year 22 Audit Selections, Docket No. 18-GIMT-084-GIT, Aug. 8, 2019.

The FCC requires **all companies, their consultants, and their contractors to retain and maintain accurate company records, including records and supporting documentation for Federal Universal Service Fund (FUSF) and Lifeline purposes**, for at least five (5) years.² For KUSF and Kansas Lifeline Service Program purposes, carriers are required to maintain records for a minimum of three (3) years, after the end of a KUSF Fiscal Year.³

This Audit Packet includes the following:

1. GVNW Data Requests (DRs) 1 through 16 requesting information and documentation related to your Company's accounting and reporting procedures and processes and supporting documentation. The Attachment to DR No. 3 is a revenue template your Company must complete for each of the sample months. Responses to DR Nos. 1 – 16 are due **no later than September 5, 2019**. Additional DRs may be issued at a later date;
2. Attachment A, which provides the DR procedures for the audit; and
3. Attachment B, which provides information regarding the designation and treatment of confidential material.

Please notify Dawn Cartellone at dcartellone@gvnw.com and myself at dsmith@gvnw.com, upon receipt of the Audit Packet and provide the Company's response to DR No. 1 as soon as possible. Your Company's audit contacts will receive a copy of the draft Audit Report, which should be distributed to all necessary Company personnel for review.

DR responses should be emailed to Dawn Cartellone and to myself.

The Company must ensure it has provided the Commission with contact information to ensure the Docket service list is correct. Please contact the Commission if your Company needs to make any updates.

GVNW will contact your Company's point of contact to establish the on-site visit dates. The on-site review will include an introductory meeting, review time for the auditor, and an exit meeting to apprise the Company of any preliminary findings or concerns. Information requested to be viewed on-site should be readily available upon the auditor's arrival.

GVNW will provide a copy of its draft Audit Report to the Company prior to filing the final Audit Report with the Commission. The Company may provide a written Management Response to address a preliminary audit finding within ten (10) business days of receipt. The Management Response should state whether the Company agrees or disagrees with a finding and, if the Company disagrees, explain why. The Company may also provide additional documentation to support the Company's position to allow GVNW time to review the information and relevant documentation to determine if a finding should be revised.

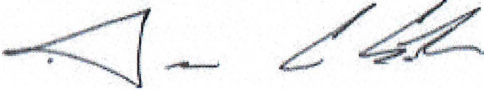
² 47 C.F.R. §54.403(a)(1), 47 C.F.R. §54.407(e), 47 C.F.R. §54.417(a), 47 C.F.R. §54.706(e). See also Public Notice, Lifeline Providers are Liable if their Agents or Representatives Violate the FCC Program Rules, DA 13-1435, at 1-2, rel. June 25, 2013 (*June 2013 Enforcement Advisory*).

³ *KLSP Requirements Order*, ¶ 7, Ordering ¶ A.4, Docket No. 05-GIMT-1039-GIT, May 19, 2005; *Order Determining KUSF Contribution Methodology*, ¶ 36, Docket No. 14-GIMT-105-GIT, Oct. 20, 2015.

If you have any questions or need further information, please do not hesitate to contact me at 217.862.1938 or by e-mail at dsmith@gvnw.com.

Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Dennis Smith', with a stylized flourish at the end.

Dennis Smith

Attachments

Data Request Instructions

*****Please review Attachment B regarding the designation of confidential information*****

GVNW will issue Data Requests (DRs) throughout its audit to request Company records and documentation, including accounting and billing system information, paper or electronic copies of customer bills, or other information necessary to support the revenues reported, the assessments paid and collected from subscribers, and any Lifeline reimbursements requested. DRs will be served by electronic mail.

I. Instructions

1. Include all information within your possession, custody or control (whether directly or indirectly), including, but not limited to: documents; information; your actual knowledge; information within the knowledge, custody, or control of any other person or entity which you can obtain upon conducting a reasonable inquiry; and documents and information in the physical control of any other person, and you: (i) own the document or information in whole or in part; (ii) have a right by contract, statute or otherwise to use, inspect, examine or copy such document or information on any terms; or (iii) have, as a practical matter, been able to use, inspect, examine or copy such document or information when you have sought to do so.
2. The terms "Company," "you," and "your" refer to the legal entity subject to this audit, however, where an affiliate and/or subsidiary maintains documents, information, or in any and all means provides inputs and/or services to the Company that pertain to audit, the terms refer to the combined efforts of the legal entity and those affiliate(s), except where a Data Request specifically distinguishes between the entities. The term "affiliate" is used as defined in the Telecommunications Act, 47 U.S.C. §153.
3. For purposes of interpreting or construing the scope of these Data Requests, all terms shall be given their most expansive and inclusive interpretation, unless otherwise specifically limited by the language of an individual interrogatory.
4. The term "document" includes, without limitation, any written, electronic, recorded, graphic or printed information or matter, in whatever form.
5. Discovery requests are continuing in nature. In the event that any information or material comes to your attention, possession, custody or control, or the attention, possession, custody or control of the Company subsequent to the filing of a Response, which is material or information is responsive to any Discovery Request, you are required to furnish said additional information or material as soon as possible.

II. DR Responses

Responses should be provided via electronic mail, unless otherwise agreed to by the parties. If a DR response requires duplication of voluminous material, defined as 300 pages or more, the Company should work with GVNW to determine the best way to send such information (e.g. secure upload, flash drive, hard copies, etc.) and may request voluminous material be viewed on its own premises.

DR responses are due on or before the specified due date.¹

A DR response shall be in writing, be dated, and include a signed verification by company personnel. Each response shall identify the person(s) who actually prepared the response and can answer additional questions relating to the response. Each response shall be clearly identified and, if consisting of several pages, shall be labeled and organized.

Your Company is under a continuing duty to supplement every DR response upon learning that the information disclosed is incomplete or incorrect in any material respect.

III. Requests for Additional Time

If your Company cannot provide a response to any DR or subpart by the due date, your Company must submit a written Request for Additional Time prior to the due date. A Request for Additional Time must include: (1) identification of information that cannot be provided, by DR number and subpart; (2) an explanation of why the information cannot be provided by the due date; and (3) the additional number of days the Company is seeking in which to provide the response.

GVNW will provide a written response to the Request. If the Request for Additional Time is granted GVNW will provide, in writing, the revised due date (not to exceed seven (7) business days). If a second Request for Additional Time is necessary, your Company must submit a second Request for Additional Time to GVNW. A second (and any subsequent) Request for Additional Time will be reviewed to determine whether: (1) additional time will be informally granted; (2) the Company should formally file a Request with the Commission; or (3) GVNW will file a Motion to Compel, with GVNW providing a written notification of the review.

¹ K.A.R. 82-1-217, "the day of the act, event, or default from which the designated period of time begins to run shall not be included. The last day of the period so computed shall be included, unless it is a Saturday, Sunday, or legal holiday, in which event the period runs until the end of the next day which is not a Saturday, a Sunday, or a legal holiday."

IV. DR Objections

Provide a written objection to any DR to GVNW within five (5) business days of the DR's issuance.² The written objection shall specifically explain all grounds relied upon for its objection. A separate objection and explanation should be provided for each DR to which the Company objects. If an objection pertains to part of a DR, the specific question or subsection shall be clearly identified and the Company shall provide any information to which it does not object. Parties shall negotiate, in good faith, to resolve discovery disputes. Any objections not provided within the five (5) business days are considered to be waived.

If resolution is not possible, a Motion to Compel may be filed with the Commission. A Company response to a Motion to Compel must be filed within three (3) business days after the Motion is received (exclude weekends and legal holidays).

V. Sanctions

A Motion for Sanctions for discovery violations may be filed at any time during the proceeding or may be initiated by the Commission. A Motion will contain sufficient factual allegations to detail the violation and specify the relief requested. Motions for Sanctions are required to be served by e-mail (if electronic service is authorized), hand delivery, or next-day delivery service. Responses to Motions for Sanctions are to be filed within ten (10) business days (exclude weekends and legal holidays).

² Per K.A.R. 82- 1-217, the designated time begins to run the day after service. When the period of time prescribed or allowed is less than seven (7) days, intermediate Sundays and holidays shall be excluded in the computation. A legal holiday includes any day designated as a holiday by either the United States Congress or the Kansas Legislature.

Confidentiality

Pursuant to Kansas statute and GVNW Consulting, Inc.'s contract with the Kansas Corporation Commission (KCC), GVNW does not need to sign a non-disclosure agreement to review confidential materials. All requested information shall be served upon GVNW, and if directed, Commission Staff, regardless of confidential designation.

K.S.A. 66-2010 provides:

(c) Any information made available or received by the administrator from carriers, utilities or providers receiving funds from or providing funds to the KUSF shall not be subject to any provisions of the Kansas open records act and shall be considered confidential and proprietary.

The Commission has addressed how confidential information provided to the KUSF Administrator fits with K.S.A. 66-1220a, the statute applicable to Commission proceedings in general and that governs the disclosure of trade secrets and confidential information. (Order, Docket No. 94-GIMT-478-GIT (Docket 478), October 30, 1998). K.S.A. 66-1220a states that the Commission shall not disclose a trade secret¹ or confidential commercial information without considering the fulfillment of its duties, the harm or benefit to the public interest, harm to the company, and alternatives to such disclosure that will serve the public interest and protect the company. K.S.A. 66-1220a(b) requires the Commission to provide notice to the company prior to disclosure if the Commission finds disclosure is warranted.

Thus, in its October 30, 1998 Order, the Commission addressed whether company-specific revenue data provided to the KUSF Administrator and designated as "confidential" under K.S.A. 66-2010(c), retains its confidential status if the information is later provided to Staff, as well as the confidential treatment of aggregated company or industry data. The Commission found that K.S.A. 66-2010(c) automatically exempts the information from the Kansas Open Records Act, with the information treated as "confidential and proprietary" (§§17, §18). The Commission noted that the information provided to the Administrator and subsequently to Staff is not subject to public review or disclosure under the Kansas Open Records Act, however, the information then falls under the governance of K.S.A. 66-1220a. The Commission also determined that underlying company-specific revenue data can appropriately be designated as confidential under K.S.A. 66-1220a and subject to the appropriate treatment under a Commission Protective Order (§§45-47). The Commission also determined that aggregated industry data, detailed descriptions of calculations, assumptions, and methodologies used should be public (§§49-50). The Commission has determined that confidential information may include: (1) information directly relating to specific customers; (2) employee sensitive information; (3) marketing analyses or other market-specific information relating to competitive services; (4) reports, workpapers, or other documentation related to internal or external auditors or consultants; (5) contract negotiation strategies; and/or, (6) trade secret information.²

¹ As defined in the Uniform Trade Secrets Act, K.S.A.60-3320 et seq.

² A Protective Order may be viewed at: <http://www.kcc.state.ks.us/docket/cal.cgi>, Docket No. 07-PLTT-1289-AUD, May 24, 2007.

The Commission more recently, in Docket 16-KCPE-593-ACQ,³ determined that a company's interest to protect two broad categories of information may outweigh the public interests of non-disclosure for: attorney/client communications or attorney work product; and critical infrastructure information.⁴ The Commission, however, also found that, "attorney/client privilege designation should not be used to shield information from paid experts, advisors, or consultants from disclosure, as no consultant/client privilege exists."⁵

A party must follow the procedures set forth in Commission rules and K.A.R. 82-1-221a to designate information as confidential. An explanation of the confidential nature of each document, page, or item for which confidential status is sought must be provided. One explanation may apply to more than one page or item, as long as the identity and confidential nature of each individual page or item is clearly stated in the explanation. The explanation shall specify the document in question, state if the information constitutes a trade secret or confidential commercial information, and "specify the harm or potential harm disclosure would cause to the entity seeking nondisclosure." The Company must also clearly mark the document, page, or item as confidential.

Once a company designates information as confidential, the auditor and KCC Staff will review to determine if the designation is appropriate. The auditor and/or KCC Staff will notify the company of any questions or concerns regarding the designation and submit, in writing, a request for the confidential designation to be removed if it does not comply with statutes, regulations, and/or Commission Orders.

Kansas Statutes, Annotated, are available from the state of Kansas website:

http://kslegislature.org/li/b2019_20/statute/066_000_0000_chapter/066_001_0000_article/.

The applicable statutes and regulations are as follows:

³ Order On Prehearing Motions, Docket No. 16-KCPE-593-ACQ (Docket 16-593), January 26, 2017. <http://estar.kcc.ks.gov/estar/ViewFile.aspx/20170126110307.pdf?Id=c388985c-f762-47c4-83d6-750cdfabf90c>.

⁴ *Ibid.*

⁵ *Ibid.*

Chapter 66.--PUBLIC UTILITIES
Article 12.--MISCELLANEOUS PROVISIONS

66-1220a. Disclosure of trade secrets and confidential information, when:

- (a) The state corporation commission shall not disclose to or allow inspection by anyone, including but not limited to parties to a regulatory proceeding before the commission, any information which is a trade secret under the uniform trade secrets act (K.S.A. 60-3320 et seq. and amendments thereto) or any confidential commercial information of a corporation, partnership or individual proprietorship regulated by the commission unless the commission finds that disclosure is warranted after consideration of the following factors:
 - (1) Whether disclosure will significantly aid the commission in fulfilling its functions;
 - (2) The harm or benefit which disclosure will cause to the public interest;
 - (3) The harm which disclosure will cause to the corporation, partnership or sole proprietorship; and
 - (4) Alternatives to disclosure that will serve the public interest and protect the corporation, partnership or sole proprietorship.
- (b) If the state corporation commission finds that disclosure is warranted pursuant to subsection (a), the commission shall give the corporation, partnership or individual proprietorship notice before disclosing the trade secret or confidential commercial information.

Kansas Administrative Regulation 82-1-221a

- (a) Any document, data, customer-specific contract, proprietary information, trade secret, or other commercial information filed with or furnished to the Kansas corporation commission (commission) as confidential shall, in addition to the requirements set forth in the Kansas statutes annotated and the Kansas administrative regulations, comply with the following requirements:
- (1) The term "document" or "documents," as used in this regulation, means any original, copy, or draft of any handwritten, typewritten, printed, graphic, or electronically recorded material, and shall include the following:
 - (a) Correspondence; (b) notes; (c) memoranda; (d) studies; (e) reports; (f) records; (g) charts; (h) invoices; (i) bills; (j) diaries; (k) calendars; (l) books; (m) statements; (n) appointment books; (o) tape recordings; (p) videos; (q) faxes; (r) computer printouts and software; (s) electronically recorded media; and (t) any other writing or tangible record of any kind, type, or nature, and however produced.
 - (2) The party seeking to classify documents as confidential shall file with or furnish to the executive director of the commission each document clearly marked "CONFIDENTIAL," accompanied by a cover letter requesting confidential status.
 - (3) Confidential information contained on a floppy disk or other electronic device shall be filed or furnished separately from other devices containing non-confidential information. The electronic device containing the confidential material shall be clearly marked "CONFIDENTIAL."
 - (4) The information contained on floppy disks or other electronic devices shall also contain the "CONFIDENTIAL" designation on each page or other subdivision of information when printed.
 - (5) A written explanation of the confidential nature of each document shall accompany each page for which confidential status is sought. One written explanation may apply to more than one page of confidential information, if the identity and confidential nature of each individual page is clearly stated in the explanation. The explanation shall be specific to the document in question and shall state whether the information constitutes a trade secret or confidential commercial information. The explanation shall further specify the harm or potential harm that disclosure would cause to the entity seeking nondisclosure.
- (b) Requests for information classified as confidential shall be made by filing a written request with the executive director of the commission and using a form provided by the commission for this purpose, or by motion from a party to the docket in which the information is sought.

- (1) If a request for information classified as confidential is not filed as a motion in an active KCC docket, the entity seeking to maintain the confidential status of the information shall be notified by the commission of the request. The entity seeking to maintain the confidential status shall have five working days after service, plus three days if service is by mail, to respond to this request. Any response filed with the commission in opposition to a request shall substantiate the basis for nondisclosure and shall be served upon the commission and the entity requesting disclosure. The entity requesting disclosure may reply to the response within five working days after service, plus three days if service is by mail, by serving a reply upon the entity seeking to maintain nondisclosure and upon the commission.
- (2) A request made by a party to a docket for disclosure of confidential documents or information contained within the docket shall be made by motion. No party shall request disclosure from the commission of information classified as confidential until the party has requested the information in writing from the party seeking to maintain its confidential nature and this request has been denied. The motion shall precede in accordance with the Kansas corporation commission's rules of practice and procedure, K.A.R. 82-1-201 *et seq.*
- (3) A determination of the confidential nature of the information and whether or not to require the disclosure of the confidential information requested under paragraphs (b)(1) and (b)(2) above shall be issued by the commission in accordance with K.S.A. 66-1220a and amendments thereto.
- (c) Each person making a request pursuant to K.S.A. 45-215 *et seq.*, and amendments thereto, for non-confidential information shall submit the request in writing and shall include the requester's name, address, telephone number, and the name of the business or entity represented.
- (d) Confidential documents submitted to the corporation commission before the adoption of this regulation, including information required by statute, regulation, or order of the commission, shall be handled in accordance with statutes, regulations, and orders applicable at the time the document was submitted. Requests for access to any of this information shall be handled in accordance with the provisions of this regulation.
- (e) Documents filed pursuant to K.A.R. 82-3-107 shall be exempt from the requirements of this regulation. (Authorized by and implementing K.S.A. 66-1220a; implementing K.S.A. 1997 Supp. 66-101c, K.S.A. 1997 Supp. 66-117, K.S.A. 1997 Supp. 66-151, K.S.A. 1997 Supp. 66-2010, K.S.A. 1997 Supp. 66-1,190, K.S.A. 1997 Supp. 66-1,203 and K.S.A. 55-704; effective March 12, 1999.)

Submitted By: Dennis Smith
Submitted To: Issa Asad
Maybell Kelly
Company Name: Q Link Wireless, LLC
Docket Number: 20-QLWZ-064-KSF
Request Date: August 25, 2019
Due Date: **September 5, 2019**

Request No. 1

RE: Company Administrative Information

Please provide the following information:

- a. The name, title, phone number, and email address of at least two (2) individuals that will be the primary contacts for the audit. The primary contacts will receive correspondence from the auditor, be involved in conference calls that occur during the audit, and be available during the on-site visit.
- b. The complete address of the location at which the on-site visit, if applicable, will occur.
- c. Information regarding other Company personnel that should receive copies of correspondence from the auditor. Such information should include the name, title, phone number, and email of each person identified.

NOTE: If for some reason, the above information cannot be provided by the date requested, your Company must submit a Request for Additional Time.

Verification of Response – DR1

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to GVNW's auditor any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed: _____

Date: _____

Submitted By: Dennis Smith
Submitted To: Issa Asad
Maybell Kelly
Company Name: Q Link Wireless, LLC
Docket Number: 20-QLWZ-064-KSF
Request Date: August 25, 2019
Due Date: **September 5, 2019**

Request No. 2

RE: Company Records

Please provide the following information:

- a. The Company's Chart of Accounts.
- b. Documentation identifying the control systems in place to ensure correct reporting of Kansas retail revenues and KUSF assessment surcharges to customers, including supervisory reviews/approvals, journalizing/booking process controls. Provide documents that support a validation of these systems, i.e., printouts or copies of revenues as they go through the system.
- c. Aging of Accounts Receivable report for the three (3) sample months.
- d. Monthly billing summaries and general ledger journals entries that support the Kansas revenues and uncollectibles reported on the Carrier Remittance Worksheets (CRW).

NOTE: If for some reason, the above information cannot be provided by the date requested, your Company must submit a Request for Additional Time.

Verification of Response – DR2

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to GVNW's auditor any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed: _____

Date: _____

Submitted By: Dennis Smith

Submitted To:

Company Name:

Docket Number:

Request Date:

Due Date:

Request No. 3

RE: Company Accounting Systems – Revenues

Please provide the following information:

- a. Provide an overview of when revenue is recognized and recorded on the Company's official accounting records (i.e. are revenues recorded when earned or when received)?
- b. Complete the attachment below for each of the sample months.



KUSF - FY 22 DR No.
3 Revenue Template

- c. For each revenue category reported on the CRW (i.e. local service, toll, miscellaneous revenue, uncollectible, etc.), explain how revenue is classified within each category and how revenues are determined. Include a detailed description of how the Company classifies revenue between the intrastate and interstate jurisdiction; assignment or allocation of revenue as local, intrastate toll/long distance, interstate long distance, etc. Documentation to support the revenues, by category, reported on the CRWs, including a listing of the Company's revenue categories and account codes that will allow the auditor to tie to the revenue reported on each CRW. This documentation should support the revenues reported per b. above.

NOTE: If for some reason, the above information cannot be provided by the date requested, your Company must submit a Request for Additional Time.

Verification of Response – DR3

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to GVNW's auditor any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed: _____

Date: _____

Submitted By: Dennis Smith
Submitted To: Issa Asad
Maybell Kelly
Company Name: Q Link Wireless, LLC
Docket Number: 20-QLWZ-064-KSF
Request Date: August 25, 2019
Due Date: **September 5, 2019**

Request No. 4

RE: Company Accounting Systems – Revenues

Please provide the following information:

- a. What general ledger account are Kansas revenues closed to?
- b. Are assessable and non-assessable revenues also charged to this account? If yes, provide a detailed explanation of the process used to identify Kansas assessable revenues from the total revenues recorded in the general ledger.
- c. Does the account include any revenues earned in other states? If yes, provide a detailed explanation of the Company's process to identify Kansas revenues recorded in the account.

NOTE: If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response – DR4

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to GVNW's auditor any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed: _____

Date: _____

Submitted By: Dennis Smith
Submitted To: Issa Asad
Maybell Kelly
Company Name: Q Link Wireless, LLC
Docket Number: 20-QLWZ-064-KSF
Request Date: August 25, 2019
Due Date: **September 5, 2019**

Request No. 5

RE: Company Accounting Systems – Billing and Collection

Billing and collections includes, but is not limited to: any means of communications via any medium, including: paper, electronic, or online information, whether such information is emailed, mailed, online information the consumer must log-on to see, or otherwise used to communicate with the consumer. Please provide the following information:

- a. A detailed explanation of the Company's billing and collection process, to include:
 1. Number of total Company monthly billing cycles;
 2. Number of Kansas monthly billing cycles;
 3. Timing of billing cycles;
 4. Are Kansas monthly billing cycles combined with other states cycles? If yes, how does the Company track the revenues for each state?
 5. What service(s) are included in the Company's bills;
 6. How revenue is accrued if billing does not occur on a calendar month basis;
 7. Any other information related to the Company's billing process not provided in response to subparts 1-6.
- b. Does your Company use any third-party vendors for billing and/or collection services or does your Company provide billing and/or collection services for another Company? If yes, include a description of the entire process to include the role of the billing vendor, your Company's part in the billing and collection process, as well as the timing of the process from providing service through receipt of payment.
- c. How many bills, on average, are issued to Kansas customers on a monthly basis? Include the total for Lifeline and non-Life customers, separately.

NOTE: If for some reason, the above information cannot be provided by the date requested, your Company must submit a Request for Additional Time.

Verification of Response – DR5

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to GVNW's auditor any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed: _____

Date: _____

Submitted By: Dennis Smith
Submitted To: Issa Asad
Maybell Kelly
Company Name: Q Link Wireless, LLC
Docket Number: 20-QLWZ-064-KSF
Request Date: August 25, 2019
Due Date: **September 5, 2019**

Request No. 6

RE: Company Accounting Systems - Identification of Kansas Revenues

Please provide the following information:

- a. Please select from the following methodologies the one(s) used by your Company to identify Kansas revenues for KUSF revenue and assessment purposes:

____ Billing Address;

____ Primary Service Address, generally the 911 address;¹

____ Primary Place of Use²; or

____ Other (please describe)

- b. Does the Company direct assign revenue or use a Company specific traffic factor to allocate revenues between the interstate and intrastate jurisdictions? If yes, provide a copy of the Company's latest KUSF methodology filing and Commission Order approving the filing.

NOTE: If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

¹ VoIP providers, please see September 22, 2008, Order, Docket No. 07-GIMT-432-GIT.

² Wireless providers, please see September 7, 2006, Order, Docket No. 06-GIMT-943-GIT.

Verification of Response – DR6

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to GVNW's auditor any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed: _____

Date: _____

Submitted By: Dennis Smith
Submitted To: Issa Asad
Maybell Kelly
Company Name: Q Link Wireless, LLC
Docket Number: 20-QLWZ-064-KSF
Request Date: August 25, 2019
Due Date: **September 5, 2019**

Request No. 7

RE: Uncollectible Revenues

Please provide the following information:

- a. Provide a detailed explanation of the Company's write-off/uncollectible revenue procedures. Please specify whether the write-offs/uncollectible revenue reported on the sample month's CRWs reflect the current month's write-offs, prior month's write-offs, aging of account process, or some other factor. If another factor or time period is used as the basis for reported uncollectibles, please describe the factor or time period.
- b. Are the write-offs/uncollectible revenue reported to KUSF actual Kansas write-offs/uncollectible revenues or based on another basis (i.e. Company-wide write-offs/uncollectible revenues allocated to Kansas)? If not based on Kansas specific revenues, provide a detailed explanation of the allocation process, including any factors used and how the factors are derived.
- c. Are the write-offs/uncollectible revenues reported to the KUSF only for assessable service revenues or are any related to non-assessable service revenues? If any amount is related to non-assessable revenue, provide a detailed explanation of the allocation process, including any factors used and how the factors are derived.

NOTE: If for some reason, the above information cannot be provided by the date requested, your Company must submit a Request for Additional Time.

Verification of Response – DR7

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to GVNW's auditor any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed: _____

Date: _____

Submitted By: Dennis Smith
Submitted To: Issa Asad
Maybell Kelly
Company Name: Q Link Wireless, LLC
Docket Number: 20-QLWZ-064-KSF
Request Date: August 25, 2019
Due Date: **September 5, 2019**

Request No. 8

RE: Customer Bills or Billing Images

Bills include, but are not limited to: any means of communications via any medium, including: paper, electronic, or online information, whether such information is emailed, mailed, online information the consumer must log-on to see, or otherwise used to communicate with the consumer and regardless of the means the subscriber pays such bill:

- a. Ten (10) Residential and ten (10) Business customer bills or billing images for each of the three (3) selected review months (total of 60). Please include bills that reflect both interstate and intrastate jurisdictional charges if your company offers both intrastate and interstate (e.g. local and long-distance) services.

NOTE: If for some reason, the above information cannot be provided by the date requested, your Company must submit a Request for Additional Time.

Verification of Response – DR8

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to GVNW's auditor any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed: _____

Date: _____

Submitted By: Dennis Smith
Submitted To: Issa Asad
Maybell Kelly
Company Name: Q Link Wireless, LLC
Docket Number: 20-QLWZ-064-KSF
Request Date: August 25, 2019
Due Date: **September 5, 2019**

Request No. 9

RE: Data Request No. 8, KUSF Surcharge Calculation

Bills include, but are not limited to: any and all means of communications via any medium, including: paper, electronic, or online information, whether such information is emailed, mailed, online information the consumer must log-on to see, or otherwise used to communicate with the consumer and regardless of the means the subscriber pays such bill:

Please provide the following information:

- a. Five business bills for each test month showing the calculation of how the KUSF surcharge collected from the customer was derived.
- b. Five residential subscriber bills for each test month showing the calculation of how the KUSF surcharge collected from each customer was derived.
- c. A detailed explanation of the line items shown on the customers' bills or billing images that are used to calculate the KUSF surcharge shown on the invoice.

Please use sample bills provided in response to DR No. 8 to illustrate the calculation of the KUSF surcharge.

NOTE: If for some reason, the above information cannot be provided by the date requested, your Company must submit a Request for Additional Time.

Verification of Response – DR9

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to GVNW's auditor any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed: _____

Date: _____

Submitted By: Dennis Smith
Submitted To: Issa Asad
Maybell Kelly
Company Name: Q Link Wireless, LLC
Docket Number: 20-QLWZ-064-KSF
Request Date: August 25, 2019
Due Date: **September 5, 2019**

Request No. 10

RE: KUSF Assessment Surcharge

Please provide the following information:

- a. Does your Company collect its KUSF assessment from its customers? If yes, provide a detailed explanation regarding how the surcharge is assessed, including, but not limited to:
 1. How the assessment surcharge is calculated;
 2. Whether it is collected through a separate line item charge on bills; and
 3. How the Company determines which services to apply the surcharge to.
- b. A copy of your Company's internal KUSF policies or procedures regarding the Company's collection of its assessment from customers, to include how the Company monitors the amount collected in comparison to the assessment owed by the Company to ensure it does not over-collect its assessment from subscribers.
- c. In what account or subaccount does the Company record the Kansas USF assessment collected from its customers?
- d. Are any other assessments, taxes, fees, miscellaneous charges, etc., recorded in this account? If yes, identify the type of charge, and how the Company identifies the Kansas USF assessment in the account.
- e. Provide the amount of KUSF assessment collected from customer for each of the test months and the general ledger entry or other documentation for each month.

NOTE: If for some reason, the above information cannot be provided by the date requested, your Company must submit a Request for Additional Time.

Verification of Response – DR10

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to GVNW's auditor any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed: _____

Date: _____

Submitted By: Dennis Smith
Submitted To: Issa Asad
Maybell Kelly
Company Name: Q Link Wireless, LLC
Docket Number: 20-QLWZ-064-KSF
Request Date: August 25, 2019
Due Date: **September 5, 2019**

Request No. 11

RE: Other Assessments and Taxes

Please provide the following information:

Provide a copy of the Company's processes and procedures to identify the following charges, assessments, taxes, and revenues from those reported to the KUSF and/or included in the determination of the Company's assessment collected from customers:

1. Franchise fee charges.
2. Local, state, and federal taxes.
3. Interstate charges (subscriber line charge/ end-user charge, long distance, special access services etc.).
4. Federal or state high-cost support payments.
5. Intrastate revenues derived from wholesale operations, such as Local Wholesale Complete (LWC) revenues.
6. Non-telecommunications revenues, such as for terminal equipment and inside wire maintenance.

NOTE: If for some reason the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response – DR11

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to GVNW's auditor any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed: _____

Date: _____

Submitted By: Dennis Smith
Submitted To: Issa Asad
Maybell Kelly
Company Name: Q Link Wireless, LLC
Docket Number: 20-QLWZ-064-KSF
Request Date: August 25, 2019
Due Date: **September 5, 2019**

Request No. 12

RE: Contribution Methodology

Please provide the following information:

- a. Provide the Company's internal KUSF reporting policies or procedures, including, but not limited to, how the Company identifies and reports discounts and promotional service revenues, and bundled services to the KUSF.
- b. If your Company offers assessable and non-assessable services in a bundle, please check the appropriate box below the contribution methodology your Company uses to report revenues to the KUSF:
 1. ☐ Unbundled service price of the assessable service;
 2. ☐ The total price of the bundle containing the service; or
 3. ☐ An alternative methodology. If the Company uses an alternative methodology to allocate bundled service revenue to the assessable services in a bundle, please provide a detailed description of the allocation methodology, including an example.
- c. If your Company recognizes any end-user, promotional, or other discounts in the revenue reported to the KUSF, please provide:
 1. A detailed listing of the types of discounts provided;
 2. A detailed explanation regarding how the discounts and revenues are assigned to assessable and non-assessable services if the Company offers bundled services; and
 3. Describe any allocation methodologies used and provide a calculation example.
- d. Provide a copy of the Company's internal Federal USF and KUSF reporting policies or procedures to support the Company's KUSF contribution methodology is consistent or that it is different than its Federal USF contribution methodology. If the methodologies

are not the same, provide a detailed explanation of the differences between the methodologies and why the Company uses separate practices.

NOTE: If for some reason, the above information cannot be provided by the date requested, your Company must submit a Request for Additional Time.

Verification of Response – DR12

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to GVNW's auditor any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed: _____

Date: _____

Submitted By: Dennis Smith
Submitted To: Issa Asad
Maybell Kelly
Company Name: Q Link Wireless, LLC
Docket Number: 20-QLWZ-064-KSF
Request Date: August 25, 2019
Due Date: **September 5, 2019**

Request No. 13

RE: Lifeline

Please provide the following information:

If your Company is a designated Eligible Telecommunications Carrier (ETC):

- a. Is your Company's ETC designation for state or federal low-income (Lifeline) purposes? If yes, please provide the KCC docket number, the date on which the designation was granted, and whether designation is for the Kansas Lifeline Service Program (KLSP), the federal Lifeline program, or both.
- b. Provide a copy of your Company's internal policies and procedures used to identify the number of qualifying Lifeline subscribers, separately for KLSP and Federal Lifeline purposes reported to each program for revenue recovery purposes.
- c. Provide a copy of your Company's policies and procedures to request reimbursement of KLSP credits from the KUSF, if applicable.
- d. Provide a copy of your Company's policies and procedures used to report the revenue recovered from the federal and/or state Lifeline programs in lieu of an end-user subscriber the KUSF.
- e. Other than the federal and/or state Lifeline credits, if your Company offers any additional discounts or credits to a low-income subscriber, provide a list of any such discounts or credits, the amount of each, and how the amount is identified on the subscriber's bill.

NOTE: If for some reason, the above information cannot be provided by the date requested, your Company must submit a Request for Additional Time.

KUSF Carrier Audit Information Request

Verification of Response – DR13

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to GVNW's auditor any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed: _____

Date: _____

Submitted By: Dennis Smith
Submitted To: Issa Asad
Maybell Kelly
Company Name: Q Link Wireless, LLC
Docket Number: 20-QLWZ-064-KSF
Request Date: August 25, 2019
Due Date: **September 5, 2019**

Request No. 14

RE: Lifeline Documentation

Please provide the following information:

For three (3) Lifeline subscribers for each of the three (3) sample months (total of 9 subscribers):

- a. Copies of the Lifeline subscriber's eligibility documentation reviewed to confirm the subscriber's eligibility. If the Company relies on a third-party administrator or eligibility database to confirm subscriber eligibility, provide the name and address of the administrator and/or the agency with oversight of the database
- b. The subscriber's initial annual Lifeline recertification and most recent annual recertification documentation.
- c. A copy of the Company's internal processes and procedures to verify each subscriber for which the Company sought reimbursement used the Lifeline service at least once every thirty days and provide documentation to support that each subscriber used the Lifeline service within the 30-day period.
- d. Monthly bills (or account history) available to a Lifeline subscriber to support that the Company passed the entire Lifeline credit(s) through to the subscriber. Bills include, but are not limited to: any means of communications via any medium, including: paper, electronic, or online information, whether such information is emailed, mailed, online information the consumer must log-on to see, or otherwise used to communicate with the consumer.

NOTE: If for some reason, the above information cannot be provided by the date requested, your Company must submit a Request for Additional Time.

KUSF Carrier Audit Information Request

Verification of Response – DR14

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to GVNW's auditor any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed: _____

Date: _____

Submitted By: Dennis Smith
Submitted To: Issa Asad
Maybell Kelly
Company Name: Q Link Wireless, LLC
Docket Number: 20-QLWZ-064-KSF
Request Date: August 25, 2019
Due Date: September 5, 2019

Request No. 15

RE: Lifeline Advertising

Please provide the following information:

- a. A copy of your Company's Lifeline advertising policy.
- b. Confirmation your Company offers Lifeline services to qualifying customers.
- c. Copies of advertisements, including flyers, newspaper advertisements, radio or television commercials, etc.

NOTE: If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response – DR15

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to GVNW's auditor any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed: _____

Date: _____

Submitted By: Dennis Smith
Submitted To: Issa Asad
Maybell Kelly
Company Name: Q Link Wireless, LLC
Docket Number: 20-QLWZ-064-KSF
Request Date: August 25, 2019
Due Date: **September 5, 2019**

Request No. 16

RE: Federal Form 499

- a. Provide a copy of your Company's federal Form 499 for the two most recent years.
- b. If your company offers Lifeline services:
 1. provide a copy of the Company's internal policies and procedures for reporting all revenue earned from Kansas Lifeline subscribers on Form 499;
 2. identify what line(s) revenues earned from Lifeline subscribers (e.g. top-up revenues, monthly service revenues received from subscribers, monthly revenue reimbursement received from the Kansas and/or Federal Lifeline programs, etc.) are reported on; and
 3. Identify the percentage of revenue earned from Kansas subscribers and reported on Form 499 is categorized as interstate/international.
- c. Verify whether the bundled methodology reported per the FCC Form 499 is the same procedure used for KUSF reporting purposes.

NOTE: If for some reason, the above information cannot be provided by the date requested, your Company must submit a Request for Additional Time.

Verification of Response – DR16

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to GVNW's auditor any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed: _____

Date: _____

CERTIFICATE OF SERVICE

20-QLWZ-064-KSF

I, the undersigned, certify that a true and correct copy of the above and foregoing Staff Response to Q Link Wireless, LLC's Request For Additional Time was served via electronic service this 18th day of September, 2019, to the following:

DENNIS C SMITH
GVNW CONSULTING, INC.
2930 MONTVALE DRIVE SUITE B
SPRINGFIELD, IL 62704
Fax: 719-594-5803
dsmith@gvnw.com

NICOLE STEPHENS, KUSF ADMINISTRATOR MANAGER
GVNW CONSULTING, INC.
2930 MONTVALE DRIVE, STE. B
SPRINGFIELD, IL 62704
Fax: 719-594-5803
nstephens@gvnw.com

JUDI USHIO, MIDWEST DIVISION MANAGER
GVNW CONSULTING, INC.
2930 MONTVALE DRIVE SUITE B
SPRINGFIELD, IL 62704
Fax: 719-594-5803
jushio@gvnw.com

WALKER HENDRIX, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Fax: 785-271-3354
w.hendrix@kcc.ks.gov

HEATHER KIRBY, REGULATORY SPECIALIST
LANCE J.M. STEINHART, P.C.
1725 WINDWARD CONCOURSE
SUITE 150
ALPHARETTA, GA 30005
Fax: 770-232-9208
hkirby@telecomcounsel.com

ISSA ASAD
Q LINK WIRELESS LLC
499 E SHERIDAN ST STE 400
DANIA BEACH, FL 33004
legal@qlinkwireless.com



Ann Murphy