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September 19, 2019

**VIA ELECTRONIC DELIVERY**

Kansas Corporation Commission  
1500 SW Arrowhead Road  
Topeka, KS 66604-4027

Re: Request for Confidential Treatment of Data Responses 14 (a-c)  
**Q LINK WIRELESS LLC; Docket No. 20-QLWZ-064-KSF**  
*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.*

To Whom It May Concern:

Q LINK WIRELESS LLC (“Q Link” or “Company”), pursuant to K.A.R. 82-1-221a, hereby respectfully requests confidential treatment of certain information included in its responses to Data Requests (DR) 14 (a-c) issued by GVNW Consulting, Inc. (GVNW), the third-party administrator of the KUSF, as identified below.

According to the Audit Packet sent to Q Link by GVNW dated August 26, 2019, Attachment B entitled “Confidentiality,” the Commission has determined that confidential information may include, among other things, “information directly relating to specific customers.” DR 14 requests the following subscriber information: (a) copies of the Lifeline subscriber’s eligibility documentation reviewed to confirm the subscriber’s eligibility; (b) the subscriber’s initial and annual recertification documentation; and (c) documentation to support that each subscriber used the Lifeline service within the 30-day period. Q Link is providing the above-referenced information (the “Protected Information”) electronically to GVNW as directed by the audit packet, via encrypted files.

The Protected Information contains highly confidential and sensitive subscriber-specific information including name, address, last four of social security number, and date of birth, as well as proprietary eligibility information (i.e. unique identifiers or documents relating to government assistance program participation or proof of income), and customer-specific account usage information. Disclosure of such Protected Information could cause the respective subscribers irreparable harm. Q Link thus requests confidential treatment of the Protected Information.

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If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me at 770-232-7805 or [hkirby@telecomcounsel.com](mailto:hkirby@telecomcounsel.com).

Respectfully submitted,

*s/ Heather Kirby*

Heather Kirby  
Regulatory Specialist  
Lance J.M. Steinhart, P.C.  
*Attorneys for Q LINK WIRELESS LLC*

cc: Issa Asad

## CERTIFICATE OF SERVICE

I, the undersigned, certify that a true copy of the foregoing Request for Confidential Treatment of Data Responses 14 (a-c) filed in Docket No. 20-QLWZ-064-KSF has been served on the service list, as follows, by means of electronic service on September 19, 2019:

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*s/ Heather Kirby*

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