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July 1, 2024

VIA ELECTRONIC DELIVERY

Executive Director
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66604-4027
(785) 271-3100

Re: Docket No. 24-GIMT-612-GIT; Annual Certification
Q LINK WIRELESS LLC

Dear Sir/Madam:

Attached please find for filing in the above referenced docket Q LINK WIRELESS LLC's Eligible Telecommunications Carrier Annual Certification. The FCC Annual Report (Form 481) deadline has been waived and certification remains unavailable. The Company will file a copy once it becomes available.

If you have any questions regarding this filing, please contact me at 770-232-9200 or etc@telecomcounsel.com.

Respectfully submitted,

s/Rachael Sears

Rachael Sears, Regulatory Specialist
Expert Telecom Compliance

Attachments

BEFORE THE KANSAS CORPORATION COMMISSION

In the Matter of Certification of Compliance)	
with Section 254(e) of the Federal)	
Telecommunications Act of 1996 and)	Docket No. 24-GIMT-312-GIT
Certification of Appropriate Use of Kansas)	
Universal Service Fund Support)	

Q LINK WIRELESS LLC’S ANNUAL CERTIFICATION

Q LINK WIRELESS LLC (“Q Link”) was named an eligible telecommunications carrier (“ETC”) by the Kansas Corporation Commission (“Commission”) for federal Universal Service Fund (“USF”) low-income support purposes in Docket No. 13-QLWZ-174-ETC by order dated March 13, 2013. Q Link, by its undersigned counsel, submits the following in accordance with the Order issued on March 21, 2024, in this Docket (“Order”), and respectfully requests that the Commission certify Q Link’s continued eligibility to receive federal low income support. Attachment 5 of the Order, attached hereto as Exhibit A, is the only attachment applicable to Q Link. The 2024 FCC Form 481 deadline has been waived and certification remains unavailable. Q Link will provide a copy to the Commission once available.

Respectfully submitted,

/s/ Lance J.M. Steinhart

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Attorneys for Q LINK WIRELESS LLC

July 1, 2024

Exhibit A

Attachment 5

Annual ETC Certification of Requirements Imposed by the
Commission in Docket Number 06-GIMT-446-GIT

1. Did your company experience any outage in the prior calendar year, as that term is defined in 47 C.F.R. § 4.5, of at least 30 minutes in duration for each service area in which an Eligible Telecommunications Carrier is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affect: (i) at least 10% of the end users served in a designated service area; or (ii) a 911 specialty facility as defined in 47 C.F.R. § 4.5(e)?

(Yes/No) **No. IF YES, PLEASE COMPLETE THE FOLLOWING:**

Date and time of Onset of the Outage	Description of the Outage and its Resolution	Particular services affected	Geographic Areas Affected	Steps Taken to Prevent a Similar Situation in the Future	Number of Customers Affected

(If necessary, please provide additional pages.)

2. Please provide the number of requests for service from potential customers within the recipient's service areas that were unfulfilled during the prior calendar year. If applicable, please explain how your company attempted to provide service to those potential customers.

Q LINK IS NOT AWARE OF ANY UNFULFILLED REQUESTS FOR SERVICE FROM LIFELINE-ELIGIBLE CUSTOMERS WHO COMPLETED THE FULL APPLICATION PROCESS INCLUDING PROVIDING ALL NECESSARY DOCUMENTS REQUIRED TO BE ENROLLED.

3. Please provide the number of complaints per 1,000 connections (fixed or mobile) in the prior calendar year. 2.93

4. A wireline ETC must certify that it is in compliance with the Commission's quality of service standards and a wireless ETC must certify that it is in compliance with the CTIA Code. **Please complete the following, as applicable to your company:**

QUALITY OF SERVICE WIRELINE ANNUAL CERTIFICATION

KCC Docket Reference: 06-GIMT-446-GIT

(Please type or print legibly)

1. My title is _____ of the _____ (Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is complying with required quality of service standards. I am binding _____ (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that _____ (Company/ Cooperative) is in compliance with the Commission's quality of service standards as adopted in Docket No. 191,206-U.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on _____ (date).

Signature

Printed/Typed Name

QUALITY OF SERVICE WIRELESS ANNUAL CERTIFICATION

KCC Docket Reference: 06-GIMT-446-GIT


(Please type or print legibly)

1. My title is CEO of the Q LINK WIRELESS LLC (Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is complying with required quality of service standards. I am binding Q LINK WIRELESS LLC (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that Q LINK WIRELESS LLC (Company/ Cooperative) is in compliance with the CTIA Code.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on 6/12/24 (date).

X


Signature

Issa Asad, CEO

Print / Typed Name

5. Each ETC must certify that it will be able to function in an emergency as set forth in 47 C.F.R § 54.202(a)(2).

ABILITY TO FUNCTION IN AN EMERGENCY ANNUAL CERTIFICATION

KCC Docket Reference: 06-GIMT-446-GIT

(Please type or print legibly)

1. My title is CEO of the Q LINK WIRELESS LLC (Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is able to function in an emergency. I am binding Q LINK WIRELESS LLC (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that Q LINK WIRELESS LLC (Company/ Cooperative) is capable of functioning in an emergency.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on 6/12/24 (date).

X 

Signature

Issa Asad, CEO

Printed / Typed Name

6. 47 U.S.C. § 214(e)(1)(B) requires every ETC to advertise its services (including Lifeline services) throughout the service area for which it has been designated “using media of general distribution.” **Please complete the following:**

Name of Media	Type of Media	Geographic Areas Reached	Dates Published
Banner Ads	Online	Statewide within approved zip codes	1/1/2023-12/31/2023
Text Ads	Online	Statewide within approved zip codes	1/1/2023-12/31/2023
Search Engine Ads	Online	Statewide within approved zip codes	1/1/2023-12/31/2023

(If necessary, please attach additional pages.)

7. A competitive ETC must certify that it offers a local usage plan comparable to that of the incumbent LEC. Please provide a description of the local usage plan(s) that is comparable to that of the incumbent LEC and complete the certification.

Taking into consideration the calling scope, usage that might otherwise be considered long distance, and mobility, a consumer may indeed find Q LINK's plans comparable to the incumbent's offerings. See attached Exhibit B for a summary of Q LINK's Lifeline rate plans, which also exceed incumbent offerings in several respects. In contrast to the ILEC plans, which contain relatively small local calling areas, Q LINK's customers can use their minutes to place calls statewide (and even nationwide) because Q LINK does not constrict customers' use by imposing a local calling area requirement. Q LINK also provides Lifeline customers with E911 capabilities and access to voice mail, caller I.D., and call waiting features at no cost.

COMPARABLE LOCAL USAGE PLAN ANNUAL CERTIFICATION

KCC Docket Reference: 06-GIMT-446-GIT

(Please type or print legibly)

1. My title is CEO of the Q LINK WIRELESS LLC (Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative offers a local usage plan comparable to that of the incumbent. I am binding Q LINK WIRELESS LLC (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that Q LINK WIRELESS LLC (Company/ Cooperative) offers a local usage plan comparable to that of the incumbent.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on 6/12/24 (date).

X 

Signature

Issa Asad, CEO

Printed/Typed Name

Exhibit B

Support for Attachment 5, Service Quality and Emergency Functionality Certifications

Service Quality and Consumer Protection

The Company is committed to satisfying all applicable state and federal requirements related to consumer protection and service quality standards.

The Company complies with the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless Service.

1. Disclose Rates and Terms of Service – These are fully disclosed in advertising as well as on the Company's website.
2. Make Coverage Maps Available – Coverage maps are available on the Company's website.
3. Provide contract terms – the Company does not employ contracts.
4. Allow a trial service – Since Lifeline customers receive free service, there is no contract with company to the service on their part. If the service does not suit their needs, they can cancel service.
5. Provide Specific Disclosure in advertising – All Company advertising, including its website, fully discloses charges and service parameters.
6. Separately Identify Carrier Charges from Tax on Billing Statements – the Company does not render billing statements to its prepaid customers, but for every transaction they make, service charges vs. taxes are fully described.
7. Provide Customers with the Right to Terminate Service Upon Changes to Their Contract – As mentioned, we don't employ contracts so this provision does not apply.
8. Provide Ready Access to Customer Service – Customers can call customer service for free by dialing 611 or a toll free number. These numbers are disclosed on the Company's website and in advertising and customer welcome materials. Customers may also access Customer Service online through the Company's website.
9. Promptly Respond to Customer Inquiries and Complaints from Government Agencies – We promptly respond to all complaints. If a customer care representative cannot help a customer, we have an escalation process. The Company is committed to resolving customer questions, concerns and complaints in a swift and satisfactory manner.
10. Privacy Policy – The Company protects the privacy of customer information in accordance with applicable federal and state laws. Our privacy policy is available, via link, on every page of the Company's website.
11. Provide Consumers with Free Notifications for Voice, Data and Messaging Usage, and International Roaming – Because the Company's service is prepaid, customers are not able to incur overage charges. However, the Company provides, at no charge, (a) a notification to consumers of domestic wireless plans that include limited data allowances when consumers approach their allowance for data usage; (b) a notification to consumers of domestic voice and messaging plans that include limited voice and messaging allowances when consumers approach their allowance for those services; and (c) a notification to consumers without an international roaming plan/package whose devices have registered abroad and who may incur charges for international usage. The Company also clearly and conspicuously discloses tools or services that enable consumers to track, monitor and/or set limits on voice, messaging and data usage.

12. Abide by the following principles regarding the ability of customers, former customers, and individual owners of eligible devices to unlock phones and tablets, ("mobile wireless devices") that are locked by or at the direction of the carrier –

- (1) Disclosure. The Company has posted on its website its clear, concise, and readily accessible policy on postpaid and/or prepaid mobile wireless device unlocking.
- (2) Postpaid Unlocking Policy. Not Applicable.
- (3) Prepaid Unlocking Policy. Upon request, the Company will unlock prepaid mobile wireless devices no later than one year after initial activation, consistent with reasonable time, payment or usage requirements.
- (4) Notice. The Company will clearly notify customers that their devices are eligible for unlocking at the time when their devices are eligible for unlocking or automatically unlock devices remotely when devices are eligible for unlocking, without additional fee. The Company reserves the right to charge non-customers/nonformer-customers with a reasonable fee for unlocking requests. Notice to prepaid customers may occur at point of sale, at the time of eligibility, or through a clear and concise statement of policy on the Company's website.
- (5) Response Time. Within ten business days after receiving a request, the Company will unlock eligible mobile wireless devices or initiate a request to the OEM to unlock the eligible device, or provide an explanation of why the device does not qualify for unlocking, or why the carrier reasonably needs additional time to process the request.
- (6) Deployed Personnel Unlocking Policy. The Company will unlock mobile wireless devices for deployed military personnel who are customers in good standing upon provision of deployment papers.

The Company reserves the right to decline an unlock request if it has a reasonable basis to believe the request is fraudulent or the device is stolen.

Functionality in Emergency Situations

As a reseller, the Company relies upon its underlying facilities-based carrier (T-Mobile) for functionality in emergency situations. Through the Company's agreement with T-Mobile, Q LINK WIRELESS has the ability to remain functional in emergency situations. T-Mobile's wireless networks have reasonable amounts of back-up power and the ability to reroute traffic around damaged facilities and manage traffic spikes resulting from emergency situations. Each cell site is equipped with two to four hours of battery back-up power, and many cell sites provide overlapping coverage for neighboring areas, ensuring that coverage continues in the event of damage to a particular facility. These neighboring cell sites can be adjusted to provide coverage to a wider service area in the event of an emergency. As an MVNO of T-Mobile these capabilities benefit Q LINK WIRELESS customers.