

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

In the Matter of Staff's Petition to Open a )  
Docket to Write-Off the Balance on Q LINK )  
WIRELESS, LLC's Kansas Universal Service ) Docket No. 26-QLWZ-088-KSF  
Fund (KUSF) Account. )

**NOTICE OF FILING OF STAFF'S REPORT AND RECOMMENDATION**

COMES NOW, the Staff of the State Corporation Commission of the State of Kansas ("Staff" and "Commission", respectively), and files its Report and Recommendation ("R&R") regarding Staff's recommendation that the Commission issue an order authorizing Vantage Point Solutions ("VPS"), the Kansas Universal Service Fund ("KUSF") administrator, the authority to write-off the credit balance of \$457.47 currently on Q Link Wireless LLC ("Q Link")'s KUSF account.

Staff has examined all relevant information from VPS and recommends that the Commission issue an order authorizing VPS to write-off \$457.47 from Q Link's KUSF account and directing VPS to close the KUSF account for Q Link. Additionally, Staff recommends that the Commission require VPS to retain the relevant KUSF records in such a manner as to track the write-off, the reason for the write-off, and any future transactions applicable to Q Link's files.

WHEREFORE, Staff submits its Report and Recommendation for Commission review and consideration and or such other relief as the Commission deems just and reasonable.

Respectfully submitted,

/s/ Madisen K. Hane

Madisen K. Hane, # 30292  
Litigation Counsel  
1500 SW Arrowhead Rd  
Topeka, KS 66604  
Phone (785) 271-3288  
Email: Madisen.Hane@ks.gov

**REPORT AND RECOMMENDATION  
UTILITIES DIVISION**

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

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

**DATE:** September 16, 2025

**SUBJECT:** Docket No. 26-QLWZ-088-KSF  
In the Matter of Staff's Petition to Open a Docket to Write-Off the Balance on Q  
LINK WIRELESS, LLC's Kansas Universal Service Fund (KUSF) Account.

**EXECUTIVE SUMMARY**

On July 30, 2025, Vantage Point Solutions (VPS), the Kansas Universal Service Fund (KUSF) Administrator, submitted a memo to Commission Staff requesting Commission authorization to write-off \$457.47 on Q Link Wireless LLC's (Q Link) KUSF account. VPS's Memorandum is attached to this Report and Recommendation (R&R) as Staff Exhibit 1.

Staff recommends that the Commission issue an order authorizing VPS to write-off \$457.47 on Q Link's KUSF account and directing VPS to maintain all related KUSF records in a manner that will allow VPS to track the reason for the write-off, the amount written-off, and any future transactions applicable to this Company's files.

**BACKGROUND**

On March 13, 2013, the Commission issued an order in Docket No. 13-QLWZ-174-ETC granting Q Link Eligible Telecommunications Carrier Status in Kansas as a Lifeline-Only service provider.<sup>1</sup>

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

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<sup>1</sup> Order Granting Eligible Telecommunications Carrier Status in Kansas and Granting Service Area Redefinitions, Docket No. 13-QLWZ-174-ETC (March 13, 2013).

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

### **ANALYSIS**

Q Link is designated as an Eligible Telecommunications Carrier and no longer provides services to Kansas customers. Q Link has been registered with the KUSF since April 2012. It reported “Not Generating Kansas Intrastate retail revenue from March 2011 – February 2013. It reported to the KUSF on an Annual basis from March 2013 – February 2021. It reported to the KUSF on a Semi-Annual basis from March 2021 – February 2024. It is delinquent in submitting its March 2025 – February 2026 (FY 29) Attachment B, along with any FY 29 worksheet(s) and assessment payment(s).

On April 15, 2025, VPS received a letter from JSI stating that it no longer represents Q Link. JSI’s letter is attached to this R&R as Staff Exhibit 2. On May 8, 2025, the KUSF Administrator received an undeliverable email notification for Issa Asad, the company contact, when attempting to send a delinquent letter via email.

The Federal Register indicates that on October 14, 2024, Q Link pleaded guilty to conspiring to defraud and commit related offenses in connection with a scheme involving the Federal Lifeline program. The FCC 499 Filer Database indicates the company is “No longer active as of 1/1/2025. This account was inactive for an extended period and closed because the administrator could not contact the filer.”

The credit balance of \$457.47 on Q Link’s KUSF account is related to an overpayment in July 2021 and the Annual True-Ups for the March 2022 – February 2023 (FY 27) and March 2023 – February 2024 (FY 28) fiscal years.

### **RECOMMENDATION**

Staff recommends that the Commission issue an order authorizing VPS to write-off \$457.47 from Q Link’s KUSF account and directing VPS to close the KUSF account for Q Link. Staff further recommends that VPS retain the relevant KUSF records in such a manner as to track the write-off, the reason for the write-off, and any future transactions applicable to Q Link’s files.

## KUSF Write-Off MEMO

Date: July 30, 2025  
To: Steve Garrett, Deputy Chief of Telecommunications  
From: Nicole Stephens, KUSF Compliance Manager  
RE: KUSF Write-Off for Q Link Wireless LLC – FY 29

### **BACKGROUND**

This memorandum requests that the Kansas Corporation Commission (Commission) authorize Vantage Point Solutions (VPS), as the Kansas Universal Service Fund (KUSF) Administrator, to write-off a credit balance of \$457.47 on the KUSF account for Q Link Wireless LLC ("Q Link") – KS006327.

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

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

### **ANALYSIS**

Q Link has been registered with the KUSF since April 2012. It reported "Not Generating Kansas Intrastate retail revenue from March 2011 – February 2013. It reported to the KUSF on an Annual basis from March 2013 – February 2021. It reported to the KUSF on a Semi-Annual basis from March 2021 – February 2024. It is delinquent in submitting its March 2025 – February 2026 (FY 29) Attachment B, along with any FY 29 worksheet(s) and assessment payment(s).

On April 15, 2025, the KUSF Administrator received a letter from JSI stating that it no longer represents Q Link. On May 8, 2025 the KUSF Administrator received an undeliverable email notification for Issa Asad, the company contact, when attempting to send a delinquent letter via email.

The Federal Register indicates that on October 14, 2024 Q Link pleaded guilty to conspiring to defraud and commit related offenses in connection with a scheme involving the Federal Lifeline program. The FCC 499 Filer Database indicates the company is "No longer active as of 1/1/2025. This account was inactive for an extended period and closed because the administrator could not contact the filer."

The credit balance of \$457.47 on Q Link's KUSF account is related to an overpayment in July 2021 and the Annual True-Ups for the March 2022 – February 2023 (FY 27) and March 2023 – February 2024 (FY 28) fiscal years.

#### **RECOMMENDATION**

VPS is seeking authorization to write-off and retain in the Fund the credit balance of \$457.47 and close the KUSF account for Q Link. VPS will retain the KUSF records in such a manner as to track the write-off, the reason for the write-off, and any future transactions applicable to this Company's files.



151 Southhall Lane, Ste. 450  
Maitland, FL 32751  
www.jsitel.com

**March 30, 2025**  
**Via Email**  
kusf@vantagepnt.com

Vantage Point Solutions  
kusf@vantagepnt.com

RE: KS USF Letter of Discontinuance of Contract for  
Q LINK WIRELESS LLC  
KS USF Code KS00

Dear Sir or Madam:

This letter is being sent to inform you that Q LINK WIRELESS LLC is no longer a Compliance Reporting Service client of JSI. JSI will no longer be providing remittance for their KS USF payments.

The contact information we have for this company is:  
Q LINK WIRELESS LLC  
Maybell Kelly  
499 East Sheridan Street, Suite 400, Dania, FL 33004  
800-610-1540

Please forward all correspondence to the contact person mentioned above.

Questions regarding this letter should be directed to me at (678) 672-2837.

Sincerely,

*Susan Cockerham*

Susan Cockerham  
Sr. Regulatory Compliance Specialist

cc: Maybell Kelly - Q LINK WIRELESS LLC  
file: Q LINK WIRELESS LLC - Reporting - Kansas

## **CERTIFICATE OF SERVICE**

26-QLWZ-088-KSF

I, the undersigned, certify that a true and correct copy of the above and foregoing Notice of Filing of Staff's Report and Recommendation was served via electronic service this 23rd day of September, 2025, to the following:

MADISEN HANE, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
madisen.hane@ks.gov

AHSAN LATIF, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
ahsan.latif@ks.gov

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

WENDY HARPER, USF SERVICES MANAGER  
VANTAGE POINT SOLUTIONS  
2930 MONTVALE DRIVE, SUITE B  
SPRINGFIELD, IL 62704  
wendy.harper@vantagepnt.com

NICOLE STEPHENS, KUSF ADMINISTRATOR MANAGER  
VANTAGE POINT SOLUTIONS  
2930 MONTVALE DRIVE SUITE B  
SPRINGFIELD, IL 62704  
nicole.stephens@vantagepnt.com

*Ann Murphy*

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