

**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 HELLO) Docket No. 26-HLMZ-097-KSF
MOBILE TELECOM, LLC's Kansas)
Universal Service Fund (KUSF) Account.)

NOTICE OF FILING OF STAFF'S REPORT AND RECOMMENDATION

The Staff of the Kansas Corporation Commission ("Staff" and "Commission," respectively) hereby files its Report and Recommendation ("R&R"), dated September 24, 2025, recommending the Commission 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 \$124.27 currently on Hello Mobile Telecom, LLC's ("Hello Mobile") KUSF's account.

The R&R indicates Staff examined all relevant information from VPS and recommends that the Commission issue an order authorizing VPS to write-off \$124.27 currently on Hello Mobile's KUSF account and directing VPS to close the KUSF account for Hello Mobile. 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 Hello Mobile's files.

WHEREFORE, Staff respectfully requests that the Commission issue an order adopting Staff's recommendation.

Respectfully Submitted,

Brett Berry

Brett Berry, Litigation Counsel, #15026
Kansas Corporation Commission
1500 S.W. Arrowhead Road
Topeka, Kansas 66604-4027
E-mail: brett.berry@ks.gov
Phone: 785-271-3287

REPORT AND RECOMMENDATION UTILITIES DIVISION

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

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

DATE: September 24, 2025

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

EXECUTIVE SUMMARY

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

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

BACKGROUND

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

ANALYSIS

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

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

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

RECOMMENDATION

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

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



KUSF Write-Off MEMO

Date: July 31, 2025
To: Steve Garrett, Deputy Chief of Telecommunications
From: Nicole Stephens, KUSF Compliance Manager
RE: KUSF Write-Off for Hello Mobile Telecom, LLC – FY 29

BACKGROUND

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

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

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

ANALYSIS

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

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

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

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

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

RECOMMENDATION

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

#6434

Exhibit 2



January 29, 2025
Via Email
kusf@vantagepnt.com

Kansas USF Administrator
Vantage Point Solutions
kusf@vantagepnt.com

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

Dear Sir or Madam:

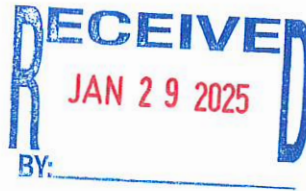
This letter is being sent to inform you HELLO MOBILE TELECOM LLC has cancelled their telecommunications Certificate of Authority. Their final date of operation was _____.

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

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

Sincerely,

Inteserra
A JSI Company



151 Southhall Lane, Ste. 450
Maitland, FL 32751

www.inteserra.com

January 27, 2025
Via Email
kusf@vantagepnt.com

Vantage Point Solutions
kusf@vantagepnt.com

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

Dear Sir or Madam:

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

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

Please forward all correspondence to the contact person mentioned above.

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

Sincerely,

Susan Cockerham

Susan Cockerham
Sr. Regulatory Compliance Specialist

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

CERTIFICATE OF SERVICE

26-HLMZ-097-KSF

I, the undersigned, certify that a true and correct copy of the above and foregoing Notice of Filing Staff R&R was served via electronic service this 30th day of September, 2025, to the following:

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

BRETT W. BERRY, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
brett.berry@ks.gov

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

Ann Murphy