

Docket No. 12-0095

Q LINK Ex. 1.0

Rebuttal Testimony of Issa Asad

Q LINK Ex. 1.7 (CGM Review Report)

Public Version



CGM, LLC
101 Vickery Street
Roswell, GA 30075

[Redacted]



CGM, LLC
101 Vickery Street
Roswell, GA 30075

Conclusion:

QLINK has built a robust internal lifeline customer management system that voluntarily goes well beyond the current requirements of the FCC, and those of state regulatory agencies. Their systems, processes and technology are in line with the best in the industry for efficiently managing customer care, lifeline enrollment and lifeline-compliant operations. QLINK continues to be an early adopter/developer of compliant-forward practices.

Chuck Campbell
Principal – CGM, LLC
12/10/14

CONFIDENTIAL

Docket No. 12-0095

Q LINK Ex. 1.0

Rebuttal Testimony of Issa Asad

**Q LINK Ex. 1.8 (Copy of the Commission's Microsoft Office Word document
authored by Jeff Hoagg titled *Additional Requirements for "Low Income" Wireless
ETC Designation*)**

Additional Requirements for “Low Income” Wireless ETC Designation

For a low income wireless ETC designation, Applicant must meet all federal and state requirements for ETCs as well as the following conditions.

1. To assist Staff and the Commission in assessing the Applicant’s capabilities to provide wireless services to Illinois customers, Applicant must have a record of providing wireless services to Illinois customers throughout the requested ETC areas for a minimum of six months prior to the submission of a wireless ETC application.
2. There must be no open or pending investigation involving the Applicant’s (or any affiliate of the Applicant) wireline or wireless operations in any State as of the submission date of the ETC application.
3. Applicant seeks designation as a Lifeline only ETC and acknowledges that the wireless ETC designation, if and when granted, does not authorize it to claim or collect Linkup support for wireless customers.
4. Applicant acknowledges that the wireless ETC designation, if and when granted, does not authorize the Applicant to claim or collect Lifeline support for **those** wireless customers that it serves (i.e., provides supported services) solely through resale of another carrier’s services, unless the Applicant has obtained forbearance from the facilities requirement from the FCC prior to the submission of its ETC application.
5. Applicant will submit the following information regarding its requested ETC areas with its ETC application:
 - A. A list of exchanges in which it seeks wireless ETC designation, including but not limited to the names of the exchanges and the names of the ILECs operating in the exchanges.
 - B. A map of the requested ETC areas, which clearly identifies the service area of each ILEC operating in the Applicant’s requested ETC areas.
 - C. Evidence that the Applicant provides supported services to wireless customers throughout the requested ETC areas.
6. Applicant will submit, with its ETC Application, all Lifeline Enrollment Forms and Lifeline Annual Verifications Forms that it will rely upon in Illinois if and when it is designated as an eligible telecommunications carrier in Illinois and begins to offer Lifeline service in Illinois.
7. In addition to meeting all federal and State requirements for ETCs, Applicant must demonstrate that it has a record of and is currently in good standing with all other applicable laws, rules and regulations and that ETC designation is in the public interest. Upon such a showing, Applicant will receive an interim one-year ETC designation.

- a. The interim one-year ETC designation may be renewed only if Applicant requests such a renewal from the Commission. If Applicant fails to timely submit such request, the ETC designation expires at the end of the interim one-year ETC period. Renewal will be granted only if Applicant demonstrates full compliance with all laws, rules and regulations, including but not limited to all federal and State requirements for ETCs, during the preceding interim one-year ETC period or periods, and that the renewal of an interim one-year ETC designation is in the public interest.
 - b. At the end of the second interim one-year ETC period, Applicant may request continuing ETC designation with no further annual review from the Commission. Continuing designation will be granted only if Applicant demonstrates full compliance with all applicable laws, rules and regulations, including but not limited to all federal and State requirements for ETCs, for the preceding interim one-year ETC periods, and that the continuing designation is in the public interest.
 - c. At any time the Commission may require Applicant to demonstrate compliance with any applicable laws, rules, regulations or conditions, including but not limited to federal and State requirements for ETCs, and may, if the applicant fails to adhere to any applicable law, rule, regulation or condition, revoke the ETC designation.
8. A request for renewal of an interim one-year ETC designation or continuing ETC designation must be submitted to the Commission 30 to 60 days prior to the expiration date of the current interim ETC period. The request must contain, at minimum, the following exhibits:
- A. Copies of all reports and exhibits filed with the Clerk of the Commission as required in Condition 16 and Condition 17 below.
9. Applicant will require every Lifeline customer to complete/sign a Lifeline Enrollment Form to certify the customer's eligibility and to provide proof of eligibility at the time of the customer's initial enrollment.

Proof of eligibility entails (i) proof of identity: evidence that the customer signing the Lifeline Enrollment Form is the person named, and does reside at the address listed, on the Lifeline Enrollment Form, and (ii) proof of program participation: evidence of the customer's participation in one of the proxy programs listed in Code Part 757.10.

Proof of identity consists of a current government issued ID with photo, name and address (e.g., driver's license, Illinois state ID, etc.), **OR** two pieces of current identification (one must include name and address), which may include a personal check (cancelled within 30 days), a current telephone, gas, electric or cable bill (issued within 30 days), mail with a current postmark (dated within 30 days), or a voter registration card.

Proof of program participation consists of copies of dated documents issued by qualifying government agencies, such as the Department of Human Services, that contain the customer's name, address and social security number **AND** that clearly establish the customer's participation in the claimed proxy program(s) at the time of initial enrollment.

*Note: a program card (such as Illinois Link Card) is not sufficient as proof of program participation **unless** the program card shows the customer's name, residence address and date of eligibility.*

Applicant will comply with the following document retention requirements:

- a. Applicant will retain all original (or scanned images of original) copies Lifeline Enrollment Forms completed/signed by every Lifeline customer at the time of initial enrollment for a minimum of three years **after** the customer terminates services with the Applicant.
 - b. Applicant will retain all original (or scanned images of original) copies of proof of identity (specified above) provided by every Lifeline customer at the time of initial enrollment for a minimum of three years **after** the customer terminates services with the Applicant.
 - c. Applicant will retain all original (or scanned images of original) copies of proof of program participation (specified above) provided by every Lifeline customer at the time of initial enrollment for a minimum of three years **after** the customer terminates services with the Applicant.
10. Applicant will verify every Lifeline customer's continued eligibility for Lifeline support every twelve (12) months. For purposes of annual verification of continued eligibility, the Applicant will require each Lifeline customer to complete/sign a Lifeline Annual Verification Form and provide proof of continued eligibility at the time of the customer's annual verification.

Proof of continued eligibility entails (i) proof of identity: evidence that the customer signing the Lifeline Annual Verification Form is the person named, and does reside at the address listed, on the Lifeline Annual Verification Form, and (ii) proof of continued program participation: evidence of the customer's continued participation at the time of annual verification in the claimed proxy program(s).

Proof of identity consists of two pieces of current identification (with name and address and date), which may include a personal check (cancelled with 30 days), a current telephone, gas, electric or cable bill (issued within 30 days), or mail with a current postmark (dated within 30 days).

Proof of continued program participation consists of copies of dated documents issued by qualifying government agencies, such as the Department of Human Services, that contain the customer's name, address and social security number **AND** that clearly establish the customer's continued participation at the time of annual verification in the claimed proxy program(s).

*Note: a program card (such as Illinois Link Card) is not sufficient as proof of continued program participation **unless** the program card shows the customer's name, residence address and date of eligibility.*

Applicant will immediately cease claiming Lifeline support for those Lifeline customers that have failed to respond to annual verification requests **OR** that have responded but failed to provide all the required documentations for proof of continued eligibility as specified above.

Applicant will comply with the following document retention requirements:

- a. Applicant will retain all original (or scanned images of original) copies of Lifeline Annual Verification Forms completed/signed by every Lifeline customer at the time of annual verification of the customer's continued eligibility for a minimum of three years **after** the customer terminates services with the Applicant.
 - b. Applicant will retain all original (or scanned images of original) copies of proof of identity (specified above) provided by every Lifeline customer at the time of annual verification of the customer's continued eligibility for a minimum of three years **after** the customer terminates services with the Applicant.
 - c. Applicant will retain all original (or scanned images of original) copies of proof of continued program participation (specified above) provided by every Lifeline customer at the time of annual verification of the customer's continued eligibility for a minimum of three years **after** the customer terminates services with the Applicant.
11. Applicant **must** offer to pass through Lifeline benefits through a Lifeline discount off its non-Lifeline rates for its wireless **voice** plans (i.e., the difference between the non-Lifeline rates and Lifeline rates after application of Lifeline discount must equal to the Lifeline benefits) (Option A). A Lifeline customer must be permitted to receive the Lifeline benefits through a Lifeline discount off the non-Lifeline rates of **any** wireless voice plans offered by the Applicant. *A wireless voice plan is a wireless plan that allows the customer to make and receive voice calls, with or without the text messaging functionality.*

Applicant **may** provide a block of free minutes per month in lieu of a Lifeline discount off the non-Lifeline rates as an alternative means to pass through Lifeline benefits (Option B). In such a case, customers must be permitted to choose between Option A (i.e., receiving Lifeline benefits through a discount off the non-Lifeline rates) and Option B (i.e., receiving Lifeline benefits through a block of free minutes).

If electing to offer a block of free minutes as an optional means for customers to receive Lifeline benefits, the Applicant must, at minimum, offer a wireless voice plan containing a block of free minutes determined by the most economical wireless voice plans offered to non-Lifeline wireless customers and the carrier's claim of Lifeline support (i.e., Tier 1, Tier 1 and Tier 2, or all three Tiers). In addition, any unused free minutes in any given month will be automatically rolled over to future months.

12. Applicant will offer wireless local calling plans comparable to those of the Incumbent Local Exchange Carriers (ILECs) operating in the Applicant's ETC areas.
- a. Applicant will file a wireless Lifeline tariff pursuant to Code Part 757.420, containing (i) a list of all individual discounts, including but not limited to low income discounts, and a description of the conditions under which each individual discount applies, (ii)

- a list of all non-recurring and recurring charges for wireless services offered to Lifeline customers before application of low income discounts, and (iii) a list of all non-recurring and recurring charges for wireless services offered to Lifeline customers after application of low income discounts.
- b. All rates (non-recurring and recurring) in the wireless Lifeline tariff must be identical for non-Lifeline and Lifeline customers before application of low income discounts.
 - c. Applicant will adhere strictly to all rates, terms and conditions of service prescribed in the wireless Lifeline tariff. Applicant will not charge its Lifeline customers any rate other than those prescribed in the wireless Lifeline tariff.
 - d. Applicant will not introduce any new wireless services for Lifeline customers unless and until it has filed a wireless Lifeline tariff with the Commission that includes the new services. A new wireless service is defined as any wireless service (or calling plan) that deviates in any way (e.g., in rates or/and structure) from those specified in the current wireless Lifeline tariff on file with the Commission. Applicant must notify Staff of any planned introduction of new wireless services to Lifeline customers and demonstrate to Staff that the new services are comparable to those of the ILECs operating in the applicant's wireless ETC areas 30 days prior to the introduction of the new wireless services.
13. Applicant must provide all Lifeline customers and prospective Lifeline customers with detailed descriptions of all available wireless voice plans ("Service Descriptions"), separate from its wireless Lifeline tariff. The Service Descriptions must meet the following criteria:
- a. The Service Descriptions must be provided in a separate document or on pages separate from the Applicant's Lifeline Enrollment Form and Lifeline Annual Verification Form. It must be presented in an easy-to-read format and it must not take a customer more than a few minutes to understand all plan options.
 - b. The Service Descriptions must explicitly state all rates (recurring and non-recurring) before application of Lifeline discount for each of its wireless voice plans.
 - c. The Service Descriptions must explicitly state the amounts (\$) of Lifeline discounts.
 - d. If the Applicant offers a block of free minutes in lieu of Lifeline discount off non-Lifeline rates, the Service Descriptions must comply with the following:
 - i. The Service Descriptions must clearly state that the block of free minutes is fully funded under the government-sponsored Lifeline program. It must also explicitly state the amounts (\$) of Lifeline benefits that are implicitly reflected in the block of free minutes.
 - ii. The Service Descriptions must clearly state that customers must **pay** for the use of additional minutes beyond the block of free minutes. And it must present all plan options available to customers when and if the customers desire to purchase additional minutes.

14. Applicant must ensure that the Lifeline Enrollment (Annual Verification) Form is used **solely** for a customer to certify his eligibility at the time of initial enrollment (verify his continued eligibility at the time of annual verification).

In addition, it must be clearly stated on both the Lifeline Enrollment and Annual Verification Forms that the Lifeline program is a government-funded program, under which qualified customers may purchase phone services from the Applicant at subsidized rates.

In no circumstances will the Applicant advertise services on the Lifeline Enrollment or Lifeline Annual Verification Forms.

15. Applicant will submit, within 30 days of the end of each calendar quarter, to the Director of the Telecommunications Division the following items:

- A. Copies of all completed/signed Lifeline Enrollment Forms submitted during the quarter by each Lifeline customer at the time of initial enrollment.
- B. Copies of all dated official documentation provided during the quarter by each Lifeline customer at the time of initial enrollment as proof of identity and program participation consistent with the requirements specified in Code Part 757.10 and Condition 9.
- C. Copies of all completed/signed Lifeline Annual Verification Forms submitted during the quarter by each Lifeline customer at the time of annual verification of the customer's continued eligibility.
- D. Copies of all dated official documentation provided during the quarter by each Lifeline customer at the time of annual verification as proof of identity and continued eligibility consistent with the requirements specified in Condition 10.
- E. A summary of the Applicant's annual verifications conducted during the quarter in accordance with Condition 10, including the following:
 - a. The number of customers that were due for annual verification during the quarter (i.e., the number of Lifeline customers that have been enrolled in the Applicant's Lifeline program for 12 months or a multiple of 12 months).
 - b. The number of customers that responded to the annual verification.
 - i. The number of customers that provided all the required documentations for proof of continued eligibility as specified in Condition 10.
 - ii. The number of customers that responded but failed to provide all the required documentations for proof of continued eligibility as specified in Condition 10.
 - c. The number of customers that failed to respond to the annual verification request.

16. Applicant will submit, to the Director of Telecommunications Division and the Clerk of the Commission, by August 1 of each year a report summarizing the results of the Applicant's annual verification conducted in the most recent 12 month period ending July 31 in the format specified in Condition 15.E.
17. Applicant will provide quarterly reports, separately for wireline and wireless operations, pursuant to Exhibit A of Code Part 757 to the Commission, the Staff Liaison, and the Universal Telephone Assistance Corporation ("UTAC"). Additionally, Applicant will submit, in its ETC designation docket, quarterly reports to the Clerk of the Commission within 30 days of the end of each calendar quarter consisting of the following items:
 - A. A Churn Rate Report as detailed in Appendix A.
 - B. A Minutes of Use ("MOU") Report as detailed in Appendix B.
 - C. A Subscribership Report as detailed in Appendix C.
 - D. Service Descriptions as specified in Condition 13.
 - E. A Low Income Support Receipt Report. The Report must list the total amount of support, Projection Override *plus* true-ups, in each category (Lifeline, Toll Limitation, etc.) **for** each month of the quarter. It must also list the amounts of Projection Override and true-ups, respectively, **for** each month. *For example, if the Projection Override for March 2011 is \$15,000 and the subsequent true-ups for March 2011 is \$5,000, the USF support amount received for March 2011 should be \$20,000 (= \$15,000 Projection Override + \$5,000 true-ups).*
 - F. Documentation demonstrating that low income support received during the quarter was passed through to Lifeline customers. Such documentation includes, but not limited to, detailed descriptions of wireless **voice** plans offered to non-Lifeline customers, including (i) a list of all individual discounts offered to non-Lifeline customers and a description of the conditions under which each discount applies, (ii) a list of all non-recurring and recurring charges for wireless services offered to non-Lifeline customers before application of discounts, and (iii) a list of all non-recurring and recurring charges for wireless services offered to non-Lifeline customers after application of discounts.
 - G. Copies of all FCC Form 497 filings submitted to the Universal Service Administration Corporation ("USAC") during the quarter.
 - H. A summary of all wireless Lifeline tariff changes filed with the Commission during the quarter, including a description of each change and citations to any revised tariff pages.
 - I. Copies of all Lifeline Enrollment Forms that Applicant distributed to potential Lifeline customers during the quarter. Note: these should be blank forms.

- J. Copies of all Lifeline Annual Verification Forms that Applicant distributed to Lifeline customers during the quarter. Note: these should be blank forms
 - K. Copies of all Lifeline publicity and advertising materials distributed during the quarter.
 - L. Copies of all written notifications provided to directors of municipal, State, and federal government agencies within the applicant's service territory.
18. Applicant will implement a non-usage policy whereby it will identify Lifeline customers that have not used its Lifeline service for 60 days, and cease to claim Lifeline support for such customers if they do not use their service within a 30-day grace period following the initial 60-day non-usage period. Specifically,
- a. If no usage appears on a Lifeline customer's account during any continuous 60-day period, Applicant will promptly notify the customer that the customer is no longer eligible for the Company's Lifeline services subject to a 30-day grace period.
 - b. If the customer's account does not show any customer-specific activity during the 30-day grace period (such as making or receiving a voice call, sending a text message, or adding money to the account), the Company will deactivate Lifeline services (i.e., ceasing to claim Lifeline support) for that customer. *Note: Customer-specific activity does not include receiving calls or text messages from the Company or its designated agents.*
 - c. The Company will not seek to recover a Lifeline subsidy for the minutes provided to the customer during the 30-day grace period, or thereafter, unless the customer reinitiates service.
 - d. The Company will not report that customer on its FCC Form 497 for the 30-day grace period, or thereafter, unless the customer reinitiates service.
19. Applicant will offer, at minimum, 30 minutes of wireless customer service calls per Lifeline customer, per month, at no charge. After 30 minutes, regular per minute charges will apply. Notice will be given to Lifeline customers via a free text message when they have used 80% of the minutes provided by their customer service allowance.
20. Applicant will remit, or ensure the remission of, wireless 911 surcharges for all Lifeline and non-Lifeline wireless customers pursuant to the Wireless Emergency Telephone Safety Act and/or Prepaid Wireless 9-1-1 Surcharge Act. Applicant will retain record of all wireless 9-1-1 surcharges remitted for its wireless (Lifeline and non-Lifeline) customers. Applicant will demonstrate, upon request, that wireless 9-1-1 surcharges have been remitted for each and every of its wireless Lifeline and non-Lifeline customers.
21. Applicant acknowledges that it is not eligible to and may not seek Illinois supplemental low income assistance under Subpart C (Universal Telephone Service Assistance Program or UTASP) of Code Part 757 for any wireless customers.

22. Applicant acknowledges that it may not seek waiver for any sections of Code Part 736 listed in Part 736.115(b) on the ground that the Applicant offers **prepaid** wireless services, i.e.,

Section 736.505(a):	Operator Answer Time;
Section 736.505(b):	Business and Repair Answer Time;
Section 736.515:	Dropped Calls and Signal Strength;
Section 736.520:	Service Outages;
Section 736.525:	Installation Requests – Failure to Provide Service;
Section 736.530:	Trouble Reports.

Appendix A

Churn Rate Report. For each month of the quarter, report for Illinois wireless operation in spreadsheet format:

- (a) The total number of wireless Lifeline customers in Illinois that remained with the applicant at the end of the month.
- (b) The number of wireless Lifeline customers in Illinois that remained with the applicant at the end of the month but had remained with the applicant for one month or less — i.e., the number of customers identified in (a) that had remained with the applicant for one month or less.
- (c) The number of wireless Lifeline customers in Illinois that remained with the applicant at the end of the month but had remained with the applicant for more than one month but less than two months — i.e., the number of customers identified in (a) that had remained with the applicant for more than one month but less than two months.
- (d) The number of wireless Lifeline customers in Illinois that remained with the applicant at the end of the month but had remained with the applicant for more than two months but less than three months — i.e., the number of customers identified in (a) that had remained with the applicant for more than two months but less than three months.
- (e) The number of wireless Lifeline customers in Illinois that remained with the applicant at the end of the month but had remained with the applicant for more than three months but less than six months — i.e., the number of customers identified in (a) that had remained with the applicant for more than three months but less than six months.
- (f) The number of wireless Lifeline customers in Illinois that remained with the applicant at the end of the month but had remained with the applicant for more than six months but less than twelve months — i.e., the number of customers identified in (a) that had remained with the applicant for more than six months but less than twelve months.
- (g) The number of wireless Lifeline customers in Illinois that remained with the applicant at the end of the month but had remained with the applicant for more than twelve months —

i.e., the number of customers identified in (a) that had remained with the applicant for more than twelve months.

Appendix B

Minutes of Use (“MOU”) Report. For each month of the quarter, report for Illinois wireless operation the following information in spreadsheet format:

- (a) The total Minutes of Use (MOUs) purchased by the Applicant for the month from its wireless wholesaler(s) for wireless Lifeline customers in Illinois.
- (b) The total Minutes of Use (MOUs) used in aggregate by wireless Lifeline customers in Illinois during the month.
- (c) The number of wireless Lifeline customers in Illinois with zero Minutes of Use (MOUs) during the month.
- (d) The number of wireless Lifeline customers in Illinois with monthly Minutes of Use (MOUs) more than zero but less than or equal to 10 minutes during the month.
- (e) The number of wireless Lifeline customers in Illinois with monthly Minutes of Use (MOUs) more than 10 but less than or equal to 30 minutes during the month.
- (f) The number of wireless Lifeline customers in Illinois with monthly Minutes of Use (MOUs) more than 30 but less than or equal to 120 minutes during the month.
- (g) The number of wireless Lifeline customers in Illinois with monthly Minutes of Use (MOUs) more than 120 minutes during the month.

Appendix C

Subscribership Report. For each month of the quarter, report for Illinois wireless operation the following information in spreadsheet format:

- (a) Names and residence addresses (apartment # (if applicable), street address, city, state and zip code) of the Illinois wireless Lifeline subscribers that remained with the Company at the end of the month
- (b) The dates (date/month/year) when Lifeline customers identified in (a) commenced Lifeline service with the Applicant.
- (c) The participating programs that the wireless Lifeline subscribers identified in (a) relied on to enroll in the Company’s wireless Lifeline program.
- (d) Phone numbers assigned to the wireless Lifeline subscribers identified in (a).

Docket No. 12-0095

Q LINK Ex. 1.0

Rebuttal Testimony of Issa Asad

**Q LINK Ex. 1.9 (Affidavit that Q LINK will comply with the listed rules
enumerated in Part 736)**

AFFIDAVIT OF ISSA ASAD

STATE OF FLORIDA)
)
 COUNTY OF BROWARD) ss.

I, Issa Asad, having first been duly sworn under oath, state as follows:

1. I am the CEO of Q LINK WIRELESS LLC, and, as such, am a person in a position to bind Q LINK WIRELESS LLC.

2. Q LINK WIRELESS LLC has been operating since 2011 and, as of the date below, provides both retail (non-Lifeline) and Lifeline wireless services in the 22 jurisdictions in which it has received ETC designation. Those jurisdictions are the following: Arizona, Colorado, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Michigan, Minnesota, Missouri, Nevada, Ohio, Oklahoma, Pennsylvania, Rhode Island, South Carolina, Texas, Utah, Vermont, West Virginia, and Wisconsin.

3. Q LINK commits to comply with the following Illinois Commerce Commission's service quality and customer protection rules enumerated in 83 Administrative Code Part 736 for so long as these rules are current, active, and applicable to Q LINK as a reseller of Sprint's wireless services:

- i. Section 736.100 Application of Part
- ii. Section 736.105 Definitions
- iii. Section 736.110 Waiver
- iv. Section 736.115 Reporting
- v. Section 736.120 Enforcement
- vi. Section 736.300 Construction and Maintenance of Plant and Equipment
- vii. Section 736.305 Emergency Operation
- viii. Section 736.310 Incorporation of National Codes and Standards
- ix. Section 736.500 Adequacy of Service
- x. Section 736.505 Answering Time
- xi. Section 736.510 Interoffice Trunks
- xii. Section 736.515 Dropped Calls and Signal Strength
- xiii. Section 736.520 Service Outages and Notification
- xiv. Section 736.525 Installation Requests – Failure to Provide Service

- xv. Section 736.530 Trouble Reports
- xvi. Section 736.540 Directory Notification
- xvii. Section 736.550 Obligation to Serve
- xviii. Section 736.555 Maps
- xix. Section 736.660 Discontinuance or Refusal of Service
- xx. Section 736.670 Illness Provision
- xxi. Section 736.680 Payment for Service
- xxii. Section 736.695 Dispute Procedures
- xxiii. Section 736.700 Commission Complaint Procedures
- xxiv. Section 736.705 Second Language
- xxv. Section 736.710 Customer Information Booklet

Dated: 12/11/13



 Issa Asad
 CEO of Q LINK WIRELESS LLC

SUBSCRIBED AND SWORN to before me this 11 day of December, 2013.



 Notary Public

My Commission Expires: October 11, 2017