

**DOCKET NO. 12-0095**

**ICC STAFF EX. 2.0**

**REBUTTAL TESTIMONY**

**OF**

**DR. QIN LIU**

**STAFF EX. 2.13 (RESPONSES TO STAFF DR-1.31 THROUGH DR-1.36)**

Q LINK WIRELESS LLC'S RESPONSES TO  
STAFF DATA REQUESTS 1.01 – 1.36

Docket No. 12-0095

Date: March 13, 2013

1.31 Page 25 of the petition states:

The primary purpose of universal service is to ensure that consumers—particularly low-income consumers— receive affordable and comparable telecommunications services. Given this context, designating Q LINK as an ETC would significantly benefit low-income consumers eligible for Lifeline services in the State of Illinois—the intended beneficiaries of universal service.

- A. Please identify the affordable rates of telecommunications service (i.e., the rates of affordable telecommunications service referred to by Q Link) in Q Link's requested ETC area Illinois.
- B. Please identify each and every geographic area (e.g., wire center, municipality, county) within Q Link's proposed wireless ETC areas in Illinois where affordable wireless telecommunications service is currently unavailable or not offered by any prepaid or non-prepaid wireless carriers.
- C. Please identify the comparable rates of telecommunications service (i.e., the rates of comparable telecommunications service referred to by Q Link) in Q Link's requested ETC area Illinois.
- D. Please identify each and every geographic area (e.g., wire center, municipality, county) within Q Link's proposed wireless ETC areas in Illinois where comparable wireless telecommunications service is currently unavailable or not offered by any prepaid or non-prepaid wireless carriers.

**Response: Q LINK does not have or keep detailed research and information on all rates of all telecommunications providers in Illinois. Nor does Q LINK have detailed research and information on such telecommunications providers' coverage area, network reach, and market saturation or availability to consumers. The nature and availability of Q LINK's plans are affordable for low-income consumers and comparable to existing wireless ETC providers.**

**Person(s) Responsible:**

**Issa Asad  
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1.32 Page 25 of the petition states:

The public interest benefits of the Company's wireless service include larger local calling areas (as compared to traditional wireline carriers), the convenience and security afforded by mobile telephone service, the opportunity for customers to control cost by receiving a preset amount of monthly airtime at no charge, the ability to purchase additional usage at flexible and affordable amounts in the event that included usage has been exhausted, 911 service and, where available, E911 service in accordance with current FCC requirements.

- A. Please identify all ETCs (including prepaid wireless ETCs, non-prepaid wireless ETCs and wireline ETCs) operating within Q Link's proposed wireless ETC areas in Illinois.

**Response: Q LINK does not have or keep detailed research and information on all ETCs designated by the Illinois Commerce Commission.**

- B. Please identify all prepaid wireless ETCs operating within Q Link's proposed wireless ETC areas in Illinois that do not offer customers the convenience and security of mobile service.

**Response: Prepaid wireless providers provide prepaid wireless service. The nature of wireless service is mobile service.**

- C. Please identify all prepaid wireless ETCs operating within Q Link's proposed wireless ETC areas in Illinois that do not afford customers the opportunity to control costs by receiving a present amount of monthly airtime at no charge.

**Response: Q LINK does not have or keep detailed research and information on all prepaid wireless ETCs and their respective available plans.**

- D. Please identify all prepaid wireless ETCs operating within Q Link's proposed wireless ETC areas in Illinois that do not afford customers the ability to purchase additional usage at flexible and affordable amounts in the event that included usage has been exhausted.

**Response: Q LINK does not have or keep detailed research and information on all prepaid wireless ETCs and their respective available plans.**

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- E. Please identify all prepaid wireless ETCs operating within Q Link's proposed wireless ETC areas in Illinois that do not provide access to 911 service in accordance with current FCC requirements.

**Response: Q LINK does not have or keep detailed research and information on all prepaid wireless ETCs and their compliance with FCC requirements.**

- F. Please identify all prepaid wireless ETCs operating within Q Link's proposed wireless ETC areas in Illinois that do not offer larger local calling areas compared to traditional wireline carriers.

**Response: Q LINK does not have or keep detailed research and information on all prepaid wireless ETCs and their coverage areas and network reach.**

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1.33 Q Link states in its petition:

Q LINK's Lifeline rate plans ... will bring a variety of rate plans into the reach of Lifeline customers that are comparable in minutes and features to those available to post-paid wireless subscribers – but at low Lifeline rates and without the burden of credit checks or contracts (petition at 26).

A. Please identify all post-paid wireless ETCs that are operating in Q Link's requested ETC areas in Illinois.

**Response: Q LINK does not have or keep detailed research and information on all ETCs designated by the Illinois Commerce Commission.**

B. Please identify the wireless plans that post-paid wireless ETCs operating in Q Link's requested ETC areas in Illinois offer to Lifeline customers.

**Response: Q LINK does not have or keep detailed research and information on all post-paid wireless ETCs and their respective available Lifeline plans.**

C. Please identify the post-paid wireless carriers whose wireless plans that Q Link refers to and please also identify the wireless plans of the post-paid carriers to which Q Link's wireless plans are comparable in minutes and features.

**Response: Q LINK does not have or keep detailed research and information on all post-paid wireless ETCs and their respective available Lifeline plans. Examples of post-paid wireless carriers are AT&T, Verizon, T-Mobile, and Sprint.**

D. Please identify all pre-paid wireless carriers that are operating in Q Link's requested ETC areas in Illinois.

**Response: Q LINK does not have or keep detailed research and information on all prepaid wireless carriers operating in Illinois.**

E. Please identify all prepaid wireless ETCs operating within Q Link's proposed wireless ETC areas in Illinois that conduct credit checks of prospective Lifeline customers.

**Response: Q LINK does not have or keep detailed research and information on all prepaid wireless ETCs operating in Illinois or their respective business operations.**

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- F. Please identify all prepaid wireless ETCs operating within Q Link's proposed wireless ETC areas in Illinois that require Lifeline customers to enter into a contract.

**Response: Q LINK does not have or keep detailed research and information on all prepaid wireless ETCs operating in Illinois or their respective business operations.**

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1.34 Page 26 of the petition states:

Providing Q LINK with the authority necessary to offer discounted Lifeline services to those most in danger of losing wireless service altogether undoubtedly promotes the public interest.

- A. Please identify each and every geographic area (e.g., wire center, municipality, county) within Q Link's proposed wireless ETC areas in Illinois where low income customers are in danger of losing wireless service. Please also provide an estimate of the number of customers in danger of losing wireless service.

**Response: Q LINK does not have or keep detailed research and information on the capability of Illinois low-income customers to obtain and keep wireless service, whether that be due to financial constraints or operational availability, coverage, or network reach of existing wireless providers.**

- B. Please identify each and every geographic area (e.g., wire center, municipality, county) within Q Link's proposed wireless ETC areas in Illinois where there are no ETCs currently offering Lifeline service to low income customers.

**Response: Q LINK does not have or keep detailed research and information on all ETCs designated by the Illinois Commerce Commission.**

- C. Please identify each and every geographic area (e.g., wire center, municipality, county) within Q Link's proposed wireless ETC areas in Illinois where there are no wireless ETCs currently offering a wireless Lifeline plan to low income customers.

**Response: Q LINK does not have or keep detailed research and information on all ETCs, wireless or otherwise, designated by the Illinois Commerce Commission.**

- D. Please identify each and every geographic area (e.g., wire center, municipality, county) within Q Link's proposed wireless ETC areas in Illinois where there are no prepaid wireless ETCs currently offering a prepaid wireless Lifeline plan to low income customers.

**Response: Q LINK does not have or keep detailed research and information on all ETCs, prepaid or otherwise, designated by the Illinois Commerce Commission.**

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- E. Please identify each and every geographic area (e.g., wire center, municipality, county) within Q Link's proposed wireless ETC areas in Illinois where there are no prepaid wireless ETCs currently offering a FREE wireless Lifeline plan to low income customers. A FREE wireless Lifeline plan refers to a wireless Lifeline plan that includes a set of minutes and is offered to Lifeline customer at a monthly rate of zero dollars.

**Response: Q LINK does not have or keep detailed research and information on all prepaid wireless ETCs and their respective available Lifeline plans.**

- F. Please identify each and every geographic area (e.g., wire center, municipality, county) within Q Link's proposed wireless ETC areas in Illinois where there are no prepaid wireless ETCs currently offering a FREE wireless Lifeline plan with 250 minutes (or more) to low income customers. A FREE wireless Lifeline plan with 250 minutes (or more) refers to a wireless Lifeline plan that includes 250 minutes (or more minutes) and is offered to Lifeline customer at a monthly rate of zero dollars.

**Response: Q LINK does not have or keep detailed research and information on all prepaid wireless ETCs and their respective available Lifeline plans.**

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1.35 Page 27 of the petition states:

Designation of Q LINK as an ETC ... will spur other carriers to target low-income consumers with service offerings tailored to their needs and to improve their existing networks to remain competitive, resulting in improved services to consumers.

- A. Please confirm whether the “other carriers” Q Link refers to include wireline ETCs operating in Q Link’s requested ETC areas in Illinois. If so, please identify these wireline “other carriers”.

**Response: Q LINK can only assume that existing carriers intend to remain competitive in order to keep low-income (i.e. price sensitive) consumers as customers. Q LINK does not have or keep detailed information on other carriers’ internal business decisions and operations.**

- B. Please confirm whether the “other carriers” Q Link refers to include non-prepaid wireless ETCs operating in Q Link’s requested ETC areas in Illinois. If so, please identify these wireless “other carriers”.

**Response: Q LINK can only assume that existing carriers intend to remain competitive in order to keep low-income (i.e. price sensitive) consumers as customers. Q LINK does not have or keep detailed information on other carriers’ internal business decisions and operations.**

- C. Please identify each and every geographic area (e.g., wire center, municipality, county) within Q Link’s proposed wireless ETC areas in Illinois where prepaid wireless ETCs currently do not target low income consumers with service offerings tailored to low income customers’ needs, and thus, need to be spurred by the designation of Q Link to target low income customers with service offerings tailored to their needs.

**Response: Q LINK can only assume that existing carriers intend to remain competitive in order to keep low-income (i.e. price sensitive) consumers as customers. Upon designation of Q LINK as an ETC, the availability of Q LINK’s affordable and attractive Lifeline plans will increase competition as it will exist as an additional competitor in the market. Q LINK does not have or keep detailed information on other carriers’ internal business decisions and operations.**

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- D. Please identify the network improvements that Q Link envisions would occur as a result of its designation and the non-prepaid and prepaid wireless ETCs whose networks Q Link's designation (as a wireless ETC) will improve.

**Response: Q LINK does not have or keep detailed information on other carriers' internal business decisions and operations.**

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1.36 Page 27 of the petition states:

Designation of Q LINK as an ETC will help assure that quality services are available at “just, reasonable, and affordable rates” as envisioned in the Act.

- A. Please identify each and every geographic area (e.g., wire center, municipality, county) within Q Link’s proposed wireless ETC areas in Illinois where quality service is currently unavailable to customers in general.
- B. Please identify each and every geographic area (e.g., wire center, municipality, county) within Q Link’s proposed wireless ETC areas in Illinois where quality service is currently unavailable to low income customers.
- C. Please identify each and every geographic area (e.g., wire center, municipality, county) within Q Link’s proposed wireless ETC areas in Illinois where quality service is not available at just, reasonable and affordable rates (as envisioned in the 1996 Act) to customers in general.
- D. Please identify each and every geographic area (e.g., wire center, municipality, county) within Q Link’s proposed wireless ETC areas in Illinois where quality service is not available at just, reasonable and affordable rates (as envisioned in the 1996 Act) to low income customers.

**Response: Q LINK does not have or keep detailed research and information on the availability or unavailability, coverage areas, network reaches of telecommunications providers in Illinois. Q LINK cannot say whether quality service is unavailable or whether it is unavailable at just, reasonable, and affordable rates; however, upon designation as an ETC, the mere availability of Q LINK’s service and Lifeline plans as an option to consumers will assure that quality service is available at just, reasonable, and affordable rates.**

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