

**DOCKET NO. 12-0095**

**ICC STAFF EX. 2.0**

**REBUTTAL TESTIMONY**

**OF**

**DR. QIN LIU**

**STAFF EX. 2.14A (68-MINUTE PACKAGE WORKSHEET)**

**STAFF EX. 2.14B (RESPONSE TO STAFF DR-5.02 & ATTCHMENT)**

**STATFF EX. 2.14C (RESPONSE TO STAFF DR-3.10 & ATTACHMENT)**

**STAFF EX. 2.14D (RESPONSE TO STATFF DR-3.11)**

**PUBLIC**



Q LINK WIRELESS LLC'S RESPONSES TO  
STAFF DATA REQUESTS 5.01-5.09  
DOCKET NO. 12-0095  
Date: January 17, 2014

5.02 In its rebuttal testimony (at 21-25), Q LINK described three different methods it deploys to enroll Lifeline customers: online, by phone, and in person. Please provide the following information regarding Q LINK's enrollment of Lifeline customers.

A. Please state whether enrollment by kiosk machine is the fourth Q LINK's Lifeline enrollment method. In the alternative, please confirm that Q LINK considers enrollment by kiosk machines as part of online enrollment.

**Response: Enrollment by kiosk machine is not a fourth Lifeline enrollment method. Q LINK considers enrollments by kiosk machines as part of online enrollment. The enrollment process at a kiosk is exactly the same as via the internet with the only difference being whether the consumer is using a Home PC, Public PC, or a Q LINK kiosk. Thus, there are only three (3) enrollment methods as previously testified to by Issa Asad, CEO of Q LINK. Q LINK confirms that it considers enrollment by kiosk machines as part of online enrollment.**

B. For each state in which Q LINK has used kiosk machines to enroll Lifeline customers, please identify the month and year in which Q LINK began to use kiosk machines to enroll Lifeline customers in the state.

**Response: Q LINK has yet to launch its kiosk machines to enroll Lifeline customers.**

C. For each state in which Q LINK enrolled Lifeline customers in March 2013, please provide the following information in spreadsheet format:

1. Please provide the total number of Lifeline customers Q LINK enrolled in the state in March 2013.

**Response: Please see attached Attachment 5.02C. Please note that the information provided herewith as Attachment 5.02C is CONFIDENTIAL AND PROPRIETARY and is being filed under seal as such. Q LINK respectfully requests confidential treatment of this information. Q LINK expects that this information will be restricted to counsel, agents, and employees who are specifically assigned to this Docket by the Commission.**

2. Please provide the number of Lifeline customers Q LINK enrolled using kiosk machines in the state in March 2013.

**Response: Please see attached Attachment 5.02C. Please note that the information provided herewith as Attachment 5.02C is CONFIDENTIAL AND PROPRIETARY and is being filed under seal as such. Q LINK respectfully requests confidential treatment of this information. Q LINK expects that this information will be restricted to counsel, agents, and employees who are specifically assigned to this Docket by the Commission.**

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3. Please provide the number of Lifeline customers Q LINK enrolled through online enrollment in the state in March 2013.

**Response: Please see attached Attachment 5.02C. Please note that the information provided herewith as Attachment 5.02C is **CONFIDENTIAL AND PROPRIETARY** and is being filed under seal as such. Q LINK respectfully requests confidential treatment of this information. Q LINK expects that this information will be restricted to counsel, agents, and employees who are specifically assigned to this Docket by the Commission.**

4. Please provide the number of Lifeline customers Q LINK enrolled by phone in the state in March 2013.

**Response: Please see attached Attachment 5.02C. Please note that the information provided herewith as Attachment 5.02C is **CONFIDENTIAL AND PROPRIETARY** and is being filed under seal as such. Q LINK respectfully requests confidential treatment of this information. Q LINK expects that this information will be restricted to counsel, agents, and employees who are specifically assigned to this Docket by the Commission.**

5. Please provide the number of Lifeline customers Q LINK enrolled in-  
person in the state in March 2013.

**Response: Please see attached Attachment 5.02C. Please note that the information provided herewith as Attachment 5.02C is **CONFIDENTIAL AND PROPRIETARY** and is being filed under seal as such. Q LINK respectfully requests confidential treatment of this information. Q LINK expects that this information will be restricted to counsel, agents, and employees who are specifically assigned to this Docket by the Commission.**

- D. For each state in which Q LINK enrolled Lifeline customers in September 2013, please provide the following information in spreadsheet format:

1. Please provide the total number of Lifeline customers Q LINK enrolled in the state in September 2013.

**Response: Please see attached Attachment 5.02D. Please note that the information provided herewith as Attachment 5.02D is **CONFIDENTIAL AND PROPRIETARY** and is being filed under seal as such. Q LINK respectfully requests confidential treatment of this information. Q LINK expects that this information will be restricted to counsel, agents, and employees who are specifically assigned to this Docket by the Commission.**

2. Please provide the number of Lifeline customers Q LINK enrolled using kiosk machines in the state in September 2013.

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**Response: Please see attached Attachment 5.02D. Please note that the information provided herewith as Attachment 5.02D is **CONFIDENTIAL AND PROPRIETARY** and is being filed under seal as such. Q LINK respectfully requests confidential treatment of this information. Q LINK expects that this information will be restricted to counsel, agents, and employees who are specifically assigned to this Docket by the Commission.**

3. Please provide the number of Lifeline customers Q LINK enrolled through online enrollment in the state in September 2013.

**Response: Please see attached Attachment 5.02D. Please note that the information provided herewith as Attachment 5.02D is **CONFIDENTIAL AND PROPRIETARY** and is being filed under seal as such. Q LINK respectfully requests confidential treatment of this information. Q LINK expects that this information will be restricted to counsel, agents, and employees who are specifically assigned to this Docket by the Commission.**

4. Please provide the number of Lifeline customers Q LINK enrolled by phone in the state in September 2013.

**Response: Please see attached Attachment 5.02D. Please note that the information provided herewith as Attachment 5.02D is **CONFIDENTIAL AND PROPRIETARY** and is being filed under seal as such. Q LINK respectfully requests confidential treatment of this information. Q LINK expects that this information will be restricted to counsel, agents, and employees who are specifically assigned to this Docket by the Commission.**

5. Please provide the number of Lifeline customers Q LINK enrolled in-person in the state in September 2013.

**Response: Please see attached Attachment 5.02D. Please note that the information provided herewith as Attachment 5.02D is **CONFIDENTIAL AND PROPRIETARY** and is being filed under seal as such. Q LINK respectfully requests confidential treatment of this information. Q LINK expects that this information will be restricted to counsel, agents, and employees who are specifically assigned to this Docket by the Commission.**

Person(s) Responsible:  
Issa Asad  
CEO of Q LINK WIRELESS LLC  
(954) 482-4255

**ATTACHMENT 5.02C & ATTACHMENT 5.02D to Q LINK response to Staff DR-5.02**

**PUBLIC**

Q LINK WIRELESS LLC'S RESPONSES TO  
STAFF DATA REQUESTS 3.01-3.12  
DOCKET NO. 12-0095  
Date: July 29, 2013

3.10 In the petition (at 12), Q Link stated:

Statistics suggest that there are many eligible customers who are not yet aware of the programs. According to the best data available to the Company, as of December 31, 2010, only between 20-50% of consumers eligible for Lifeline Services in the State of Illinois were being provided such services. Q LINK believes that its advertising and outreach efforts detailed above will result in increased participation in the Lifeline program.

- A. Of the Lifeline eligible customers in Illinois that are not receiving Lifeline service, does Q Link know the percentage of the Lifeline-eligible customers that are currently receiving non-Lifeline services (i.e., connected to the public switched telephone network)? If so, please provide the percentage and provide the source or study that Q Link relies on for the information.
- B. Of the Lifeline eligible customers in Illinois that are not receiving Lifeline service, does Q Link know the percentage of Lifeline-eligible customers that are not receiving any telephone service and are unaware of the federal Lifeline benefits? If so, please provide the percentage and the source or study that Q Link relies on for the information.

**Response: According to the best data available to the Company, as of December 31, 2011, above 50% of customers eligible for Lifeline services in the state of Illinois were being provided such services. See Attachment 3.10.**

**According to the best data available to the Company, there are approximately 800,000 customers in Illinois that are not receiving Lifeline service. Q LINK does not know the percentage of the Lifeline-eligible customers that are currently receiving non-Lifeline services because Q LINK neither has access to nor is the telecommunications providers in Illinois.**

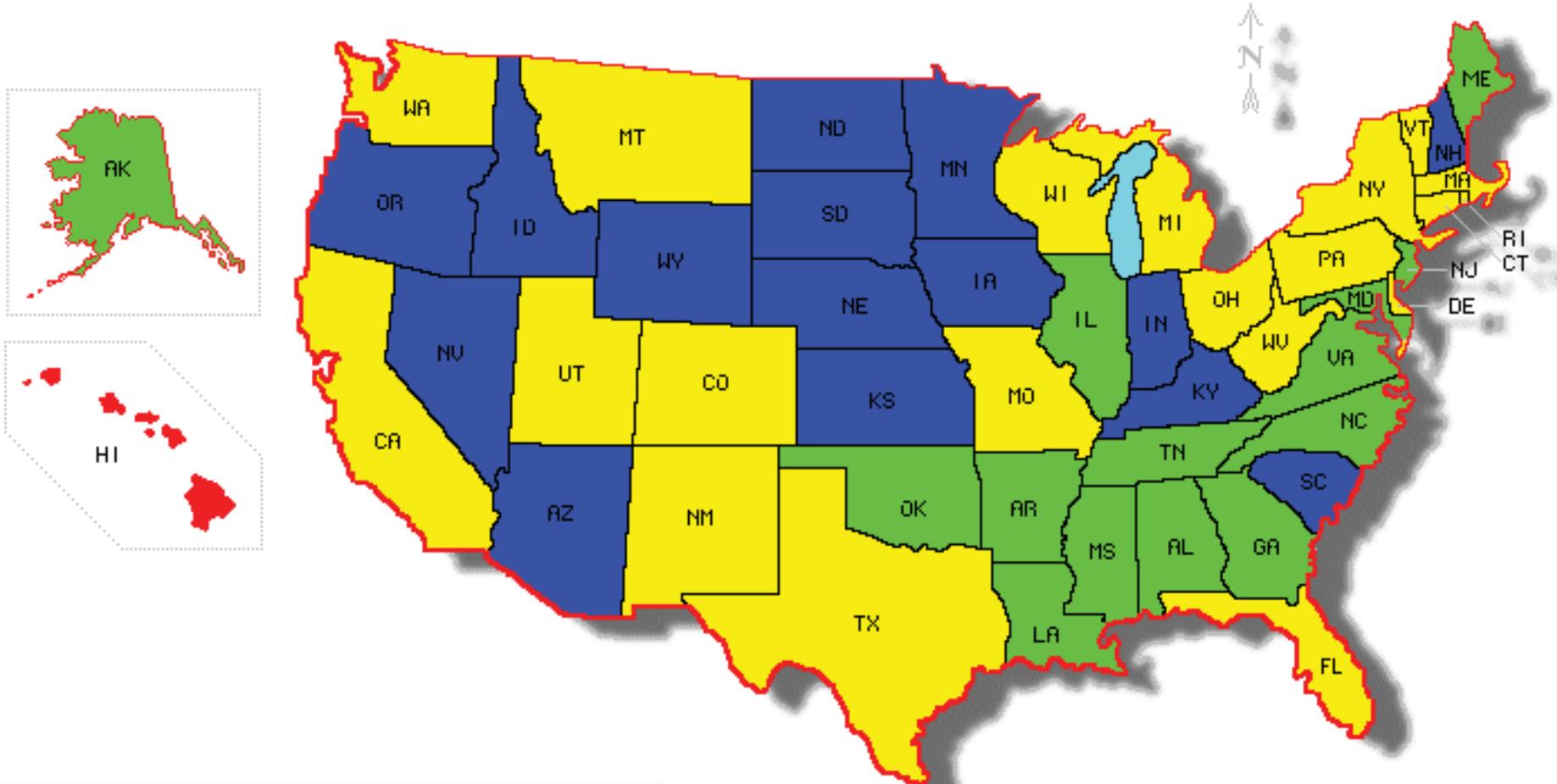
**Further, Q LINK does not know the percentage of Lifeline-eligible customers that are not receiving any telephone service and are unaware of the federal Lifeline benefits because Q LINK cannot reasonably determine whether customers in Illinois are or are not aware of federal Lifeline benefits.**

**Person(s) Responsible:**

**Issa Asad  
CEO of Q LINK WIRELESS LLC  
(954) 482-4255**

# 2011 Lifeline Participation Rates by State

- - Below 10%
- - 10% - 20%
- - 20% - 50%
- - Above 50%



**Note:** Due to the intricacy and range of criteria that are used to determine eligibility for the Lifeline program and the limitations of the data used, the methodology employed to create this map involves several estimates, assumptions, simplifications, and omissions. Therefore, the rates generated on this map should be treated as estimates only.

Q LINK WIRELESS LLC'S RESPONSES TO  
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3.11 Please provide the following information:

A. Does Q Link know of any Illinois communities or geographic areas within its requested ETC area in Illinois where the publicity efforts of existing ETCs have failed to reach and low-income consumers are thus unaware of the federal Lifeline benefits? If so, please identify such communities and geographic areas.

**Response: Q LINK is unaware of geographic areas within its requested ETC area in Illinois where publicity efforts of existing ETCs have failed to reach any low-income consumers. According to the best data available to the Company, there are approximately 800,000 customers in Illinois that are not receiving Lifeline service. Q LINK will make every possible effort to reach out to eligible consumers throughout its designated service area in the state of Illinois.**

B. Please identify any publicity efforts that Q Link is going to launch upon designation in Illinois that will reach the communities that the publicity efforts of existing ETCs have failed to reach. Please demonstrate how the Q Link publicity efforts will reach communities that the publicity efforts of existing ETCs have failed to reach.

**Response: Q LINK will have Company kiosks placed at/in various retail areas frequented by low-income consumers, such as shopping centers, grocery stores, income assistance facilities, flea markets, etc. In addition, where possible, Q LINK will place its kiosks at/near social service organizations where low-income consumers frequent, such as Medicaid offices, HRS offices, food distribution centers, etc. Q LINK has yet to contract with retail locations for placement of its kiosks. Upon designation as an ETC in IL, Q LINK will promptly begin such contract negotiations to ensure kiosk placement where it will best meet the needs of Illinois Lifeline customers to apply for Lifeline or purchase additional minutes. Q LINK will coordinate its outreach efforts with and provide advertising materials to governmental agencies and other organizations that administer relevant governmental assistance programs and cater to those likely to qualify for support.**

C. Does Q Link know of any specific segments or groups of low income consumers (within Q Link's requested ETC area in Illinois) whom the publicity efforts of existing ETCs have failed to reach and who thus are unaware of the federal Lifeline benefits? If so, please identify such segments or groups of low income consumers.

**Response: Q LINK does not know of any specific segments or groups. According to the best data available to the Company, there are**

**approximately 800,000 customers in Illinois that are not receiving Lifeline service. Q LINK will make every possible effort to reach out to eligible consumers throughout its designated service area in the state of Illinois.**

D. Please identify the Q Link publicity efforts that Q Link is going to launch upon designation that will reach the specific segment or group of low income consumers (within Q Link's requested ETC area) whom the publicity efforts of existing ETCs have failed to reach. Please also demonstrate how the Q Link publicity efforts will reach the specific segment or group of low income consumers whom that the publicity efforts of existing ETCs have failed to reach.

**Response: In January 2013, Q LINK CEO Issa Asad met with Jim Zolnierrek and other Commission staff in person and provided a full overview of all the marketing efforts Q LINK will utilize, including but not limited to:**

**Internet marketing: Q LINK utilizes proprietary technologies to reach customers via the internet through its different methods using banners and email creative ads.**

**Governmental Agencies: Q LINK will coordinate its outreach efforts with and provide advertising materials to governmental agencies and other organizations that administer relevant governmental assistance programs to those likely to qualify for support.**

**Local Kiosks: Upon designation as an ETC in IL, Q LINK will have Company kiosks placed at/in various retail areas frequented by low-income consumers, Q LINK will promptly begin such contract negotiations to ensure kiosk placement where it will best meet the needs of Illinois Lifeline customers to apply or purchase additional minutes.**

**Person(s) Responsible:**

**Issa Asad  
CEO of Q LINK WIRELESS LLC  
(954) 482-4255**