

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of Q Link)
Wireless, LLC, for Designation as an)
Eligible Telecommunications Carrier in the)
State of Missouri)
File No. RA-2012-0205

STAFF STATUS REPORT

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”) and for its status report, states as follows:

1. On January 4, 2012, Q Link Wireless, LLC (“the Company”), a wireless carrier, filed an application with the Missouri Public Service Commission (“Commission”) seeking designation as an Eligible Telecommunications Carrier (“ETC”) for the purpose of receiving federal universal service fund support for low income customers through Lifeline and Link Up programs (after the Company filed its Application, the Link Up program was eliminated: the Staff’s recommendation is to grant ETC status for low-income support only).

2. In the attached Memorandum, the Staff recommends that the Commission grant the Company’s request. In the Staff’s opinion, the Company has met all the requirements, both state and federal, to become designated as an eligible telecommunications carrier for receipt of federal universal service fund low-income support. The Company is not delinquent or non-compliant with any of the Commission’s reporting or assessment requirements; the Company is a mobile wireless telecommunications provider whose operations are not regulated by the Commission.

3. As the Company will provide service using its own facilities (at least in part), it is not required by the recent FCC Order to have an FCC-approved compliance plan prior to designation as an ETC in Missouri.

WHEREFORE, Staff recommends that the Commission grant Q Link Wireless, LLC's Application to be designated an Eligible Telecommunications Service for the receipt of low-income support from the federal Universal Service Fund.

Respectfully submitted,



Colleen M. Dale
Senior Counsel
Missouri Bar No. 31624
Attorney for the Staff of the
Missouri Public Service Commission
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 30th day of April, 2012.



MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. RA-2012-0205
Company Name: Q Link Wireless, LLC

From: Dana Parish
Telecommunications Department

John Van Eschen (4/30/12) Cully Dale (4/30/12)
Utility Operations Division General Counsel's Office

Subject: Staff Recommendation Regarding Q Link Wireless, LLC's Application
for ETC Status on a Wireless Basis

Date: April 30, 2012

On January 4, 2012 Q Link Wireless, LLC (Q Link) filed an application with the Missouri Public Service Commission (PSC) seeking designation as an Eligible Telecommunications Carrier (ETC) in Case No. RA-2012-0205. The application was for the purpose of receiving federal universal service fund support for low income customers exclusively.

Q Link proposes to offer a wireless service for qualifying low-income consumers. Proposed plans will include a choice of 68 minutes, 125 minutes, and 250 minute packages. Additional minutes are available for purchase in denominations of \$9.99, \$19.99, \$29.99 and \$59.99. Since wireless companies are not eligible to participate in the Missouri Universal Service Fund Program (MoUSF), Q Link does not intend to seek MoUSF funding for this service.

The Staff has reviewed the ETC application submitted by the company. In addition, Staff has issued data requests to the company in Case No. RA-2012-0205. Attachment A identifies ETC application requirements for companies only seeking low-income support. In Staff's opinion, the company has met these requirements. Staff has inserted citations from data request responses and/or ETC Application responses within Attachment A showing citations for why Staff concludes the company does meet these requirements. Therefore, Staff recommends the Commission grant ETC status to Q Link Wireless, LLC. The Commission's order should specifically limit ETC status to solely the receipt of federal Lifeline support.

Q Link Wireless LLC

Compliance with ETC Application Requirements
(Lifeline/LinkUp Assistance)

Requirement (Rule citation)		Description	Comply (Paragraph)
FCC	MoPSC		
54.201	-	Defines ETC as a carrier providing service using at least a portion of its own facilities. <i>(Note: a carrier solely providing service via UNEs is OK but a carrier solely providing service via resale is not.)</i>	Acceptable Application pg.11 DR 0001, #6
54.101	3.570 (3)(C)1	Ensures certain service features are provided (touchtone, single-party, access to 911, IX service, relay (711), DA, operators, toll limitation)	Acceptable DR 0001, #5
FCC Docket No. 96-45 FCC/ TracFone decision		Commits to remit 911 revenues to local authorities.	Acceptable DR 0001, #7 Ex. 1
-	3.570 (3)(D)	<i>Wireless providers: Within 30 days of receiving ETC status will make an informational filing describing all service offerings.</i>	Acceptable DR 0001, #16 Ex. 8
54.202(a) (1)	-	Commit to provide service throughout proposed service area	Acceptable DR 0001, #7 Application pg.18
54.202(a)(1)(B)	-	Commit to provide service in a timely manner.	Acceptable DR 0001, #8
54.202(a)(2)	3.570 (2) (A)4	Commit to remain functional in emergencies.	Acceptable DR 0001, #9-11
-	3.570 (2)(A)9	Statement it will provide equal access if all other ETCs in that service area relinquish their ETC designations.	Acceptable Application pg.18
54.202(a)(3)	3.570 (2)(B)	Commit to satisfy consumer protection & quality of service standards. <i>(Wireless ETCs commit to CTIA code of conduct + attach copy of current CTIA code)</i>	Acceptable DR 0001, #16 Ex. 8
54.202(a)(4)	3.570 (2)(A)10	Commit to offering a comparable usage plan as ILEC.	Acceptable DR 0001, #13
54.202(c)	3.570 (2)(A)5	Demonstrates granting ETC status is in public interest.	Acceptable Application pg.23
-	3.570 (3)(A)	Clear bill design.	Acceptable DR 0001, #5, 26
-	3.570 (3)(B)	Customer service contact information online and on billing statements.	Acceptable DR 0001, #5

-	3.570 (3)(E)	Commit to maintain record of customer complaints.	Acceptable Application pg.22
54.401(c)	-	Not collect a deposit from a Lifeline subscriber if consumer voluntarily elects toll limitation service.	Acceptable DR 0001, #18
54.401(e)	-	Not charge a Lifeline subscriber a monthly number portability charge.	Acceptable DR 0001, #19
54.403	3.570 (2)(A)7	Discounts consistent with federal plan: Tier 1: \$6.50 (waive subscriber line charge)* Tier 2: \$1.75 (fed discount) Tier 3: \$1.75 (additional fed discount available to all companies in Missouri) - <u>\$3.50 state MoUSF (landline only)</u> - \$13.50 max. * Limited to ILEC's subscriber line charge amount.	Acceptable DR 0001, #20
54.405 (b)	3.570 (2)(A)6	Publicize Lifeline.	Acceptable DR 0001, #12
54.409 54.410	31.050	FCC rules state ETC must comply with state verification procedures in states that mandate state Lifeline support. MoPSC rules require a company to verify customer's eligibility; develop a process for documentation received; plus verify a customer's continued eligibility.	Acceptable DR 0001, #23-25
-	3.570 (2)(A)8	Statement will satisfy consumer privacy protection standards.	Acceptable Application pg.20
-	3.570 (3)(F)	Notify PSC of any changes to contact info.	Acceptable Application pg.2
	31.050(3)(D)	Acceptable Lifeline application form	Acceptable Per 4/30/12 EFIS filing made by company. Company agrees to use MO generic form, only adding approved company name and contact information. Anything additional company agrees to submit a request to the USF Board.
	3.540(2)(A)5	ETC destination would be consistent with the public interest. (<i>Public interest may be an issue if applicant has relationships with other companies/individuals under investigation for Lifeline program violations.</i>)	Acceptable DR 0001, #4

Compliance with Other Funding/Filing Requirements		
Item	Yes	No
Missouri USF Assessment	N/A	
PSC Assessment		
Relay Missouri		
Annual Report		

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Wireless LLC as an Eligible)
Telecommunications Carrier in the State of) Case No. RA-2012-0205
Missouri)

AFFIDAVIT OF DANA PARISH

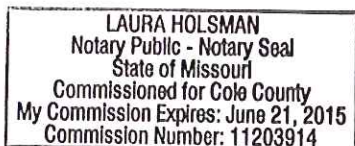
STATE OF MISSOURI)
)**ss**
COUNTY OF COLE)

Dana Parish of lawful age, on oath states: that she participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to her; that she has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of her knowledge and belief.



Dana Parish

Subscribed and sworn to before me this 30th day of April, 2012.





Notary Public