

**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)	Case No. RA-2012-0205
Carrier in the State of Missouri)	
)	

**FIRST AMENDMENT TO APPLICATION OF Q LINK WIRELESS LLC
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER
IN THE STATE OF MISSOURI**

I. INTRODUCTION.

Q LINK WIRELESS LLC (“Q LINK” or the “Company”), by its undersigned counsel, and, pursuant to 4 CSR 240-2.080(18), files this Amendment to its Application for Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of Missouri which was filed on January 4, 2012.

II. COMPANY FACILITIES.

Q LINK, in its provision of wireless services, will rely on a combination of Company-owned facilities and resold services that the Company will obtain from underlying wireless providers that currently operate their own networks. Q LINK’s facilities provide the Company the ability to route operator service calls, customer service calls, and directory assistance calls, as well as minutes of use for local service provided at no additional charge to end-users, which satisfies the FCC’s definition for supported services.¹ Q LINK’s updated facilities schematic is attached hereto as **** HIGHLY CONFIDENTIAL **** Exhibit 1.

¹ See *In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing an Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Reform – Mobility Fund*, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-

FCC Rule 54.201(d) states that a common carrier using a combination of its own facilities and resale of another carrier's services shall be eligible to receive universal service support. In affirming its own decisions, the FCC chose to continue to define the term "own facilities" as "*any physical components* of the telecommunications network that are used in the transmission of the services that are designated for support."² Therefore, Q LINK meets the FCC's test that requires an ETC to provide services, at least in part, through a combination of its own facilities and resale of another carrier's services.³

III. CONCLUSION

Rapid grant of the Company's request would advance the public interest because it would enable the Company to commence much-needed Lifeline services to low-income Missouri residents as soon as possible. Accordingly, the Company respectfully requests that the Commission expeditiously approve its application, as amended, for ETC designation.

Respectfully Submitted,

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Attorneys for Q LINK WIRELESS LLC

January 31, 2012

208, Report and Order and Further Notice of Proposed Rulemaking, (rel. Nov. 18, 2011) ("*USF/ICC Transformation Order*"), para. 78; *see also* Revised Section 47 C.F.R. § 54.101(a) (redefining supported services).

² *See* 47 C.F.R. § 54.101; 47 C.F.R. § 54.201(e) (emphasis added).

³ *See* 47 U.S.C. § 214(e)(1)(A).

CERTIFICATE OF SERVICE

I hereby certify that I have this the 31st day of January, 2012, served a true copy of the foregoing Amendment upon the following parties, listed below, in accordance with Commission

Rules:

Office of the Public Counsel
Post Office Box 7800
Jefferson City, MO 65102

General Counsel
Missouri Public Service Commission
Post Office Box 360
Jefferson City, MO 65102

/s/ Lisa A. Gilbreath

Lisa A. Gilbreath

State of Florida)
)
County of Broward)

Certification

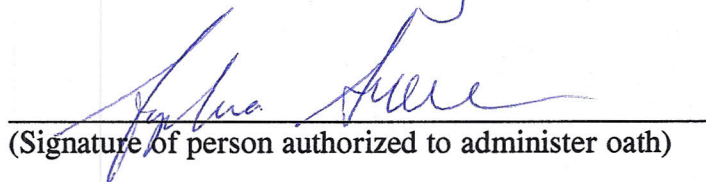
Personally appeared before the undersigned, an officer duly authorized to administer oaths, Issa Asad, who first being duly sworn, deposes and states that he is the Managing Member of QUADRANT HOLDINGS GROUP LLC, Managing Member of Q LINK WIRELESS LLC of Q LINK WIRELESS LLC, Applicant in this Application, and has read the same and knows the contents thereof, and confirms that the statements made herein are true to the best of his knowledge and belief.

Dated: 1/17/12



Issa Asad
Managing Member of QUADRANT HOLDINGS GROUP LLC,
Managing Member of Q LINK WIRELESS LLC

Subscribed and sworn to before me this 17th day of January 2012.



(Signature of person authorized to administer oath)

My Commission Expires: November 7th, 2015